



Modern Slavery Statement

Year Ending 31 December 2023



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Introduction

Lineage is the world’s largest cold storage and logistics business, offering a network of strategically located cold storage facilities and end to end transport solutions across North America, Europe and the Asia Pacific (together, the **Lineage Group**). The Lineage Group has grown extensively over the last fifteen years both organically and by way of acquisition. [Our purpose? To transform the world’s food supply chain to eliminate waste and help feed the world.](#) Through our Global Warehousing Solutions and Global Integrated Solutions, we partner with food and beverage companies to help increase cold chain distribution efficiency, advance sustainability, minimize supply chain waste and, most importantly, feed the world.

The ultimate parent entity of the Lineage Group is Lineage, Inc, a company incorporated in the United States of America. More information on the Lineage Group is available at our website: [Lineage | Global Cold Storage Warehousing & Integrated Solutions \(onelineage.com\)](#). Our Asia Pacific region operates facilities in Australia, New Zealand, Singapore, Vietnam, Sri Lanka and, through a joint venture, in China.



While from a business perspective, our Asia Pacific region covers a broad geographic area, in light of our global corporate structure and the entities that are deemed to be Reporting Entities for the purpose of Australia’s modern slavery laws, this statement contains an overview of the modern slavery risks for our operations and supply chains in Australia, Vietnam and Sri Lanka, unless otherwise stated, which together will be referred to as our **Australian Operations** throughout this statement.

This Modern Slavery Statement has been prepared in respect of the year ending 31 December 2023 by Lineage AP Holdings Pty Ltd (ABN 27 637 083 544) (**LAP**), the parent entity of Lineage’s Australian Operations, on behalf of itself and its subsidiaries, a list of which is set out in Annexure A. When this statement refers to “Lineage”, “we”, “us” or “our” it is a reference to LAP and its wholly owned subsidiaries. LAP’s registered address is 100-130 Abbotts Road, Dandenong South, Victoria 3175.



Our Commitment

The Lineage Group is driven by our culture of continuous improvement and our six core Values, which define who we are, with Safe being our number one Value.



Aligned with our Values, our commitment to working ethically, responsibly and with integrity is captured in our global “Strengthen the Chain” Code of Conduct, a copy of which can be found at: [Lineage | Ethics and Compliance at Lineage \(onelineage.com\)](https://onelineage.com/ethics-compliance). Our Code applies to all team members wherever we do business and, of particular relevance, includes a section on the selection and management of third parties. Underpinning the Code is the importance of the Lineage Group’s Speak Up program through which team members and third parties are encouraged to report any concerns about misconduct or potential misconduct. Lineage has established an Ethics Hotline for this purpose, the details of which are set out later in this statement.

Our Environmental, Social and Governance (ESG) initiatives are captured in the Lineage Group’s 2022 Sustainability Report, which is available at: [Lineage | Sustainability \(onelineage.com\)](https://onelineage.com/sustainability). This report details the ESG materiality assessment undertaken by the Lineage Group to identify the areas in which Lineage is seeking to move the needle as an organization and talks to the Lineage Group’s approach to continuous improvement through annual strategic plans and the utilization of Lean principles and practices.

For our Australian Operations, our approach to modern slavery is one of continuous improvement where we look to strengthen our approach to vendor management year on year by building on the previous actions we have taken to identify and, where applicable, address ethical risks in our supply chain. We support the principles in the *Universal Declaration of Human Rights* and the *International Bill of Human Rights* as well as the International Labour Organisation’s eight core conventions as set out in the *Declaration on Fundamental Principles and Rights at Work*, the *UN Guiding Principles on Business and Human Rights*, and the *OECD Guidelines for Multinational Enterprises*.

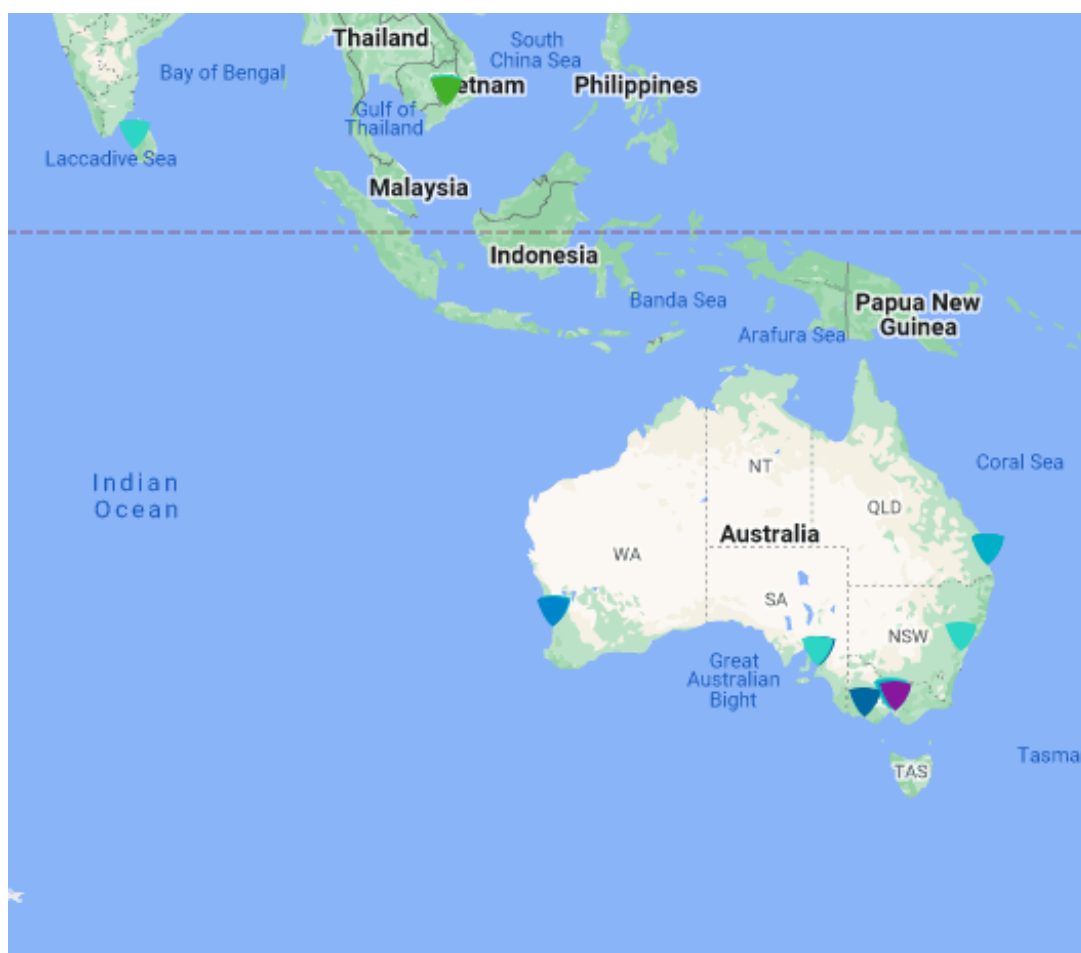


Structure, Operations and Supply Chain

Overview

The Lineage Group owns and operates income-producing real estate across our global operations and is structured as a real estate investment trust (**REIT**). Lineage provides warehouse storage, handling and transportation services to customers in all sectors of the food and beverage marketplace and many of our sites are licensed to support the exporting of food products to other countries.

The Lineage Group has over 480 strategically located facilities worldwide totaling over 84.1 million square feet and 3.0 billion cubic feet of capacity. The locations of our Australian Operations are shown below.



- Active Construction
- Automated Warehouse
- D2C Fulfillment
- Dedicated or Leased Warehouse
- Freight Forwarding
- Headquarters
- Port Location
- Public Warehouse
- Regional Distribution Center
- Regional Office

We acknowledge that our core business as a cold storage and logistics provider has the potential to cause, contribute to or be linked with modern slavery within our operations and supply chain and we are



working hard to interrogate our supply chain to ensure those risks are identified and prevented or mitigated.

Operations

The Lineage Group employs more than 25,000 individuals from around the world, just less than 10% of which are based in the Asia Pacific region. In our Australian Operations, Lineage employs approximately 1,260 people in Australia, 570 in Vietnam and 80 people in Sri Lanka. For completeness, our Asia Pacific region also employs around 460 people in New Zealand and 170 in Singapore.

Our team members work across a range of roles from operational, including pickers, forklift drivers, warehouse management, checkers and general hands to functional support, including in the areas of:

- quality, health, safety and environment;
- engineering; maintenance and construction;
- human resources; and
- finance.

The Australian Operations also utilizes a temporary workforce through formal arrangements with licensed labour hire organisations. On any given day, the number of labour hire workers on site within the Australian Operations could be in the range of 350-450 workers. Our labour hire workers perform operational and administrative roles in our warehouse operations, including working as pickers, packers and forklift operators.

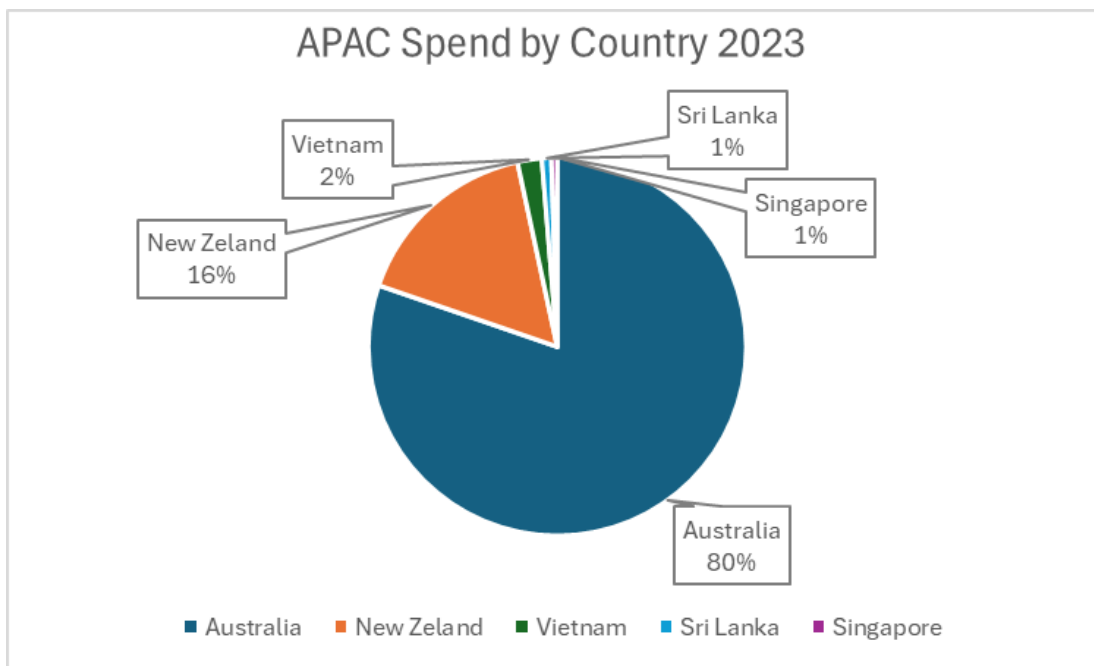
Supply Chain

During the reporting period, our Australian Operations engaged approximately 1,100 third party suppliers in Australia, 310 in Vietnam and 220 in Sri Lanka. During 2023, the Lineage Asia Pacific region engaged 2,554 suppliers across the five countries that constitute that region. For the Asia Pacific region, Lineage predominantly uses local suppliers from within the same country as the operations undertaking the sourcing.

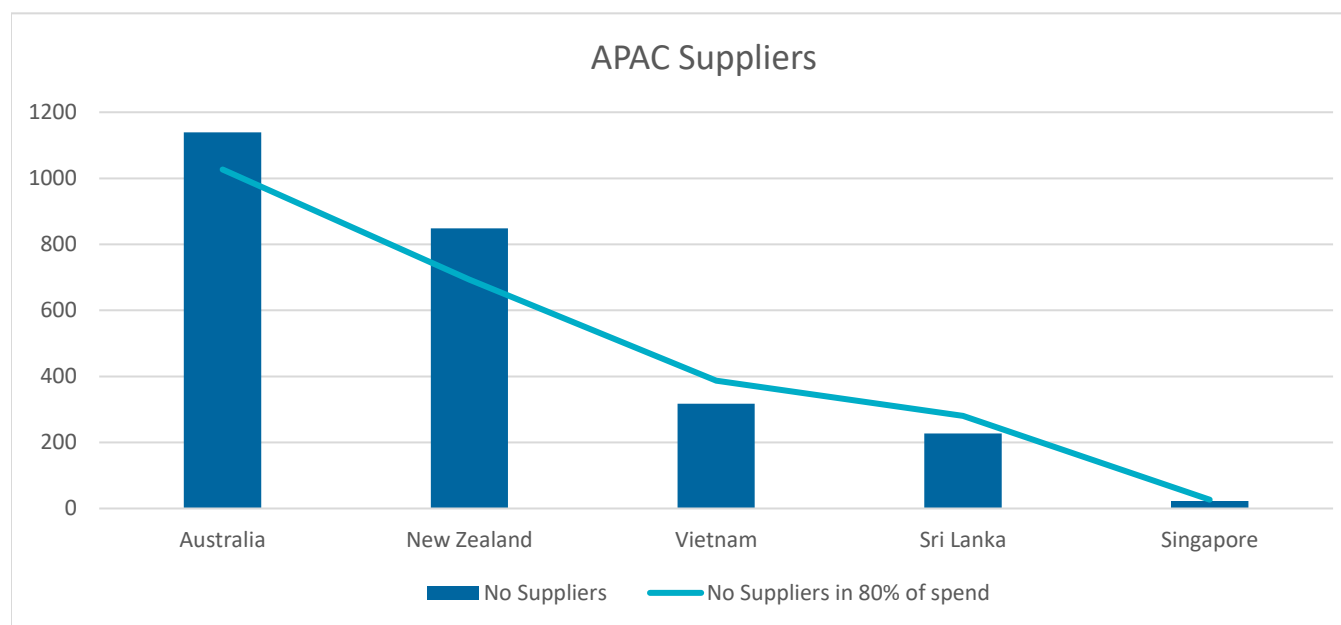
The range of products and services procured during the reporting period was varied and included items such as:

- in terms of products: vehicles, manual handling equipment (**MHE**), fuel, tyres, workwear and personal protective equipment, warehouse equipment and supplies and insurance; and
- with respect to services: utilities, cleaning, labour hire, IT, construction and transport.

The following chart shows the spend per country in the Lineage Asia Pacific region for the 2023 reporting year.



Applying the Pareto Principle to the supply base as reflected above, during the reporting period, 80% of our spend was with less than 181 of the 2,554 third party vendors. Of that 181, 77 were suppliers to the Australian business which represented 80% of the overall spend for the region. The key procurement categories within this cohort of suppliers are maintenance, motor vehicles, including MHE, sub-contractors and professional services. Of these, the categories that represent the highest risk from a modern slavery perspective, and therefore the areas in which the most positive impact can be made, are transport providers, cleaners and labour hire. The diagram below provides further analysis of our supplier segmentation.





Risks of Modern Slavery

Operations

We consider the risk of modern slavery in our operations to be low.

Our employees are engaged directly, with the terms and conditions of their employment set out in employment contracts and relevant industrial instruments. We pay all team members at, or above, the minimum wage and verify that each team member is entitled to work in the relevant jurisdiction and of legal working age. Team members are paid for overtime and internal controls exist to ensure that any such overtime is reasonable. All workers are provided with appropriate personal protective equipment having regard to the nature of their role.

Training is provided both to new employees and to existing employees on an ongoing basis. Annual training on the Lineage Group's global Code of Conduct is provided to employees, with the most recent training being held in the fourth quarter of the reporting period. Lineage's corporate policies are communicated to our team members through online training programs, tool box talks and other means so as to clearly establish safety, conduct and other expectations for our workforce.

Supply Chain

We acknowledge that, without any further action, the risk of modern slavery within our supply chain is higher than within our own operations given we do not have direct visibility of the working environment offered by each of our third party providers.

Our potential exposure to modern slavery runs up and down our value chain. This is because modern slavery risks lie both in our supplier relationships and also potentially in our customer relationships as we do not typically prepare or own the goods we store and transport. As such, our control over the origin of the goods we are storing and transporting is limited.

With respect to modern slavery risks, we have identified a number of inherent exposure points within our operations and supply chain as described further below.

Food products

We do not typically procure the food products that we pick, pack, store and deliver. The Global Slavery Index identifies fish, including deep sea fishing and seafood preparation, as one of the products at the highest risk of modern slavery and which is imported into the G20 region, particularly due to the risk of forced labour and debt bondage. Lineage moves and stores food products, including seafood and rice, which may be connected to modern slavery in relevant regions.

Shipping

We also acknowledge that there is an inherent risk of modern slavery in shipping. Shipping freight providers can be at risk of labour rights violations such as forced labour. The shipping companies that deliver the products that we pick, pack, store and deliver are engaged by our customers and we are not involved in the selection and management of those providers.



Invisible workforce

Cleaning, janitorial, construction and IT services are industries that form part of the invisible workforce of Lineage. The Global Slavery Index identifies laptops, computers, and mobile phones as the number one product at risk of modern slavery which is imported into the G20. Even though Lineage procures many of these services through contractors and other third parties, often with limited control over these supply chains, Lineage understands that any suspected modern slavery practices by contractors or providers of IT goods still falls within Lineage's supply chain.

Lineage also acknowledges that there is an inherent risk in using labour hire services. This is because labour hire arrangements involve reduced visibility over the treatment of workers. In Australia, each of our labour hire providers must comply with the labour licensing regime.



We are committed to responsible sourcing as a fundamental part of our commitment to maintaining the integrity of the food supply chain. Lineage is also committed to helping eradicate the worst forms of child labour, forced labour, slave labour and other human rights impacts within our supply chain.

Land Transport

Different companies within the Australian Operations have different types of arrangements with land transport drivers. While some employ drivers directly, others engage with drivers as contractors (or utilize a mixture of both). The Global Slavery Index reports that the transportation industry is vulnerable to human trafficking in many countries, particularly along regional arterial corridors.

Geographic Risk

We understand that where our operations exist in jurisdictions at a higher risk of modern slavery, that increases the inherent risk that suppliers domiciled in those jurisdictions may cause, contribute to or be directly linked to modern slavery. To this end, with respect to our Australian Operations, the Modern Slavery Index evaluates Australia and Vietnam as being at low risk of modern slavery, whereas the index identifies Sri Lanka as having a prevalence of modern slavery while not high risk.

We recognize that electronics, electrical equipment and construction materials can be associated with low skilled workers, especially where the supply chain for those products commences in countries identified as being high risk. As noted, we predominantly procure products and services from within the country of operation.



Actions Undertaken in 2023

Actions

Building on the steps we took in the previous reporting year to identify and prevent or mitigate the risk of modern slavery in our supply chain, over the course of 2023, we have taken additional actions to further assess and address those risks, including through the ongoing analysis of our spend with, and the segmentation of, our third party vendors. These actions are discussed further below.



Procurement Process

During the reporting period, our Australian Operations has sought to strengthen the overall management of our procurement function with the appointment of a dedicated procurement resource who works closely with the Lineage Asia Pacific Legal team. Establishing a centralised procurement function has provided consistency in our approach, greater oversight of our spend, and the ability to consolidate that spend and minimize the number of suppliers we engage.

In 2023, our Senior Manager for Procurement developed a comprehensive RFX process to ensure appropriate rigour is built into the procurement of material products and services for our business. To this end, our centralised procurement function led a number of competitive tenders. These tender processes provided an opportunity to interrogate each potential supplier's compliance with various legal requirements and best practice initiatives and covered a range of industries, including:

- the provision of transport services (the **Transport Tender**);
- the procurement of workwear, including personal protective equipment;
- the delivery of cleaning services at our Hume Road site in Laverton, Victoria; and
- the provision of truck cleaning services for our site in Tullamarine, Victoria.

Following the Transport Tender, we reduced the number of our Australian transport providers to create greater efficiency in the management of our transport operations. Successful tenderers were required to enter into a new form of agreement for the provision of transport services, which incorporated more robust compliance expectations than had been previously the case and which are appropriate for the nature of the services being provided. For example, the new Transport Services Agreement provides Lineage with audit rights in connection with the supplier's performance of, and compliance with, the agreement.

In short, we are seeking to strengthen our end to end procurement process to ensure that we have appropriate insight into, and oversight of, our suppliers by establishing clear expectations upfront in the



contract, managing the relationship throughout the engagement and investigating issues as and when we become aware of a concern or potential issue.

Integrity of Investigations

During the reporting period we put in place a formal standing engagement with an independent consulting firm to support us in carrying out investigations in our South East Asian business. In the event we become aware of a genuine concern regarding a potential modern slavery or other legal, compliance or ethical issue, which by its nature warrants investigation, this arrangement provides us with a level of comfort that the investigation is undertaken and completed to an appropriate standard.



Supplier Questionnaires

Further, in 2023, we took steps to deepen our understanding of the level of modern slavery compliance across our supplier base. We commenced selected supplier audits, initially focused on our transport providers (in addition to the Transport Tender). Through detailed questionnaires we assessed suppliers in relation to payment compliance, modern slavery considerations, working hours and related matters.

Knowledge Build

We have also focused on collaborating with our customers to understand their needs in managing modern slavery risks in their own supply chain. Relevant team members have attended customer seminars and more general training to drive our understanding and continuous improvement program.

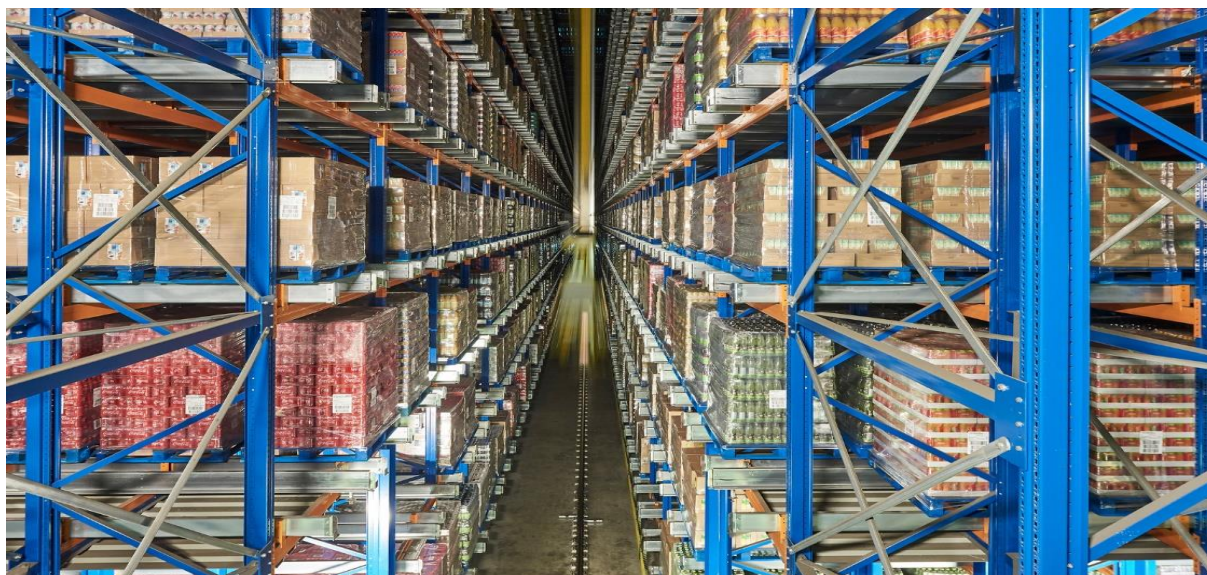
Effectiveness of 2023 Actions

The day-to-day management of our modern slavery risk management program is overseen by our centralised Asia Pacific Procurement and Legal teams in consultation with representatives from across our Australian Operations, including Human Resources, Risk & Audit, Safety, IT and Operations. The LAP's Board of Directors is ultimately responsible for assessing the effectiveness of our modern slavery risk management program.

Our most successful mechanism for assessing the effectiveness of the actions we have undertaken to assess and mitigate or prevent the risks of modern slavery in our supply chains is our global Speak Up Policy, which accommodates the legal and language requirements of different countries. Further, through living our Values of Safe, Trust and Servant Leadership, our global Executive Leadership team and regional Senior Leadership team strongly encourage team members to raise any actual or potential concerns of which they are aware. This culture together with our Speak Up Policy underpins our ability to proactively understand and respond to issues as they arise. All disclosures are promptly reviewed and, where appropriate further investigated.



Our Speak Up Policy is open not only to our team members, but to third parties as well. The details of our independent Lineage Ethics Hotline as provided through Lighthouse are set out below. The Hotline is available globally, in multiple languages, and reports can be made anonymously.



We have also improved the day to day relationship with our supplier base through regular meetings or other touch points and our regional Senior Leadership team meets every month to discuss matters impacting our business, including existing and emerging risks.

Lineage Ethics Hotline

We want you to feel comfortable approaching your manager or supervisor with questions and concerns. At the same time, we understand there may be situations in which you prefer another option. We established the Lineage Ethics Hotline, hosted by a third-party provider, to assist you in reporting concerns or raising questions related to misconduct or potential misconduct.

The Lineage Ethics Hotline is available 24/7, confidential and where allowed by local law, anonymous. Reports can be submitted through the following channels:

- **By phone:**

| | |
|------------------------------|--|
| Australia - 1-800-768-120 | Norway - 800 62 472 |
| Belgium - 0800-262-67 | Poland - 0-0-800-141-0023 |
| Canada - 866-360-0008 | Singapore - 8004922583 |
| Denmark - 80 25 42 15 | South Africa - 080 098 2093 |
| France - 0805-080039 | Sri Lanka- 9-072-0987140 |
| Germany - 0800-183-0724 | Spain 900-963267 |
| Italy - 800 743 075 | United Kingdom - 0-808-189-0041 |
| Netherlands - 0800- 023-3064 | United States of America- 866-360-0008 |
| New Zealand - 0800 823 509 | (English) or 800-216-1288 (Español) |
| | Vietnam 120-32121 |
- **Online:** Submit a report online at www.lighthouse-services.com/lineagelogistics
- **By email:** Send an email to reports@lighthouseservices.com, making sure to include our company name in the email.



Future Actions

With Lineage still being relatively young in the Asia Pacific region, we continue to prioritise ongoing continuous improvement in the maturity of our modern slavery risk management program. To this end, as discussed further below, considerable effort will be undertaken in 2024 to introduce, or strengthen existing, initiatives to further address modern slavery risks in our supply chain.

| # | ACTION | DESCRIPTION |
|----|--|--|
| 1. | Build Procurement Team | A Procurement Manager for our Vietnam business, reporting into our Procurement Manager for Asia Pacific, will be appointed further demonstrating our commitment to building our capability and addressing modern slavery risks through upfront analysis of potential suppliers prior to any engagement. |
| 2. | Lineage Group’s Global Financial Crime Prevention Program | As part of our ongoing continuous improvement journey, the Lineage Group’s global Corporate Compliance & Ethics team has commenced a project to further strengthen our prevention and mitigation of financial crimes. This program of work will underpin a robust compliance framework having regard to anti-bribery, sanctions and other applicable laws as well as the overall management of third party due diligence risk and conflicts of interest. As part of this project, an automated third party screening solution will be developed and integrated into our supplier onboarding process. The new system is expected to be in place for the Asia Pacific region by December 2024. |
| 3. | Supplier Audits | We will continue to undertake supplier questionnaires and adhoc audits of our suppliers to assess their level of legal compliance as well as the adoption of ethical working methods. To support this assessment, we will undertake deeper analysis of our vendors within the 80% category (see above) with the initial focus being on the cohort that makes up the 177 Australian suppliers and of those to identify the categories of supplier that could pose the greatest risk from a modern slavery perspective. |
| 4. | New Precedents | The Legal team will work with the Procurement team to implement a refreshed set of precedent sourcing documents. To this end, new Purchase Order terms and conditions for each country in the Australian Operations will be developed as will a new Master Services Agreement, all of which will incorporate appropriate contractual requirements to support Lineage in meeting its legal and compliance obligations. |

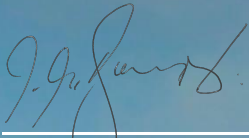


| # | ACTION | DESCRIPTION |
|----|--|--|
| 5. | Contractor Management Framework | With a view to strengthening our contractor management framework, we will review our existing IT tools for the management of contractors and refresh both the questions to which they must respond and the documents that they must provide as part of their onboarding process. As part of this refresh, specific questions targeted at understanding a supplier's approach to managing the risk of modern slavery in their supply chain will be incorporated. |
| 6. | Competitive tender processes | In 2024, we will continue to explore and expand our tender process. At the time of writing we are in the process of several sourcing events in Australia and Vietnam to further streamline our supplier base. |
| 7. | Risk Management | At the time of writing, our Risk & Audit team has completed an indepth review and update of our Enterprise Risk Management framework, which our Senior Leadership team will continue to use as a proactive and systematic mechanism for identifying key risk domains, including modern slavery risks. This regular review by senior leaders of our key organizational risks in the Asia Pacific region will further underpin our ability to meet our legal and compliance obligations. |

Consultation and Approval

This statement is a result of consultation and collaboration across our business, including with Procurement, Operations, Human Resources, Legal, Safety and IT. The members of the Australian Operations (as listed in Annexure A) share substantial similarity in their appointed officeholders and our regional Senior Leadership team is responsible for the day to day management of our Australian Operations. Accordingly, all Lineage Reporting Entities and their owned or controlled entities (as set out in Annexure A) were consulted in the preparation of this statement.

This statement was approved on 28 June 2024 by the board of Lineage AP Holdings Pty Ltd as the parent Reporting Entity for the Lineage Australian consolidated group, on behalf of itself and its subsidiaries listed in Annexure A.



Craig Bowyer
Director
28 June 2024





Annexure A: Australian Consolidated Group



LAP's subsidiaries

AUSTRALIA

Lineage AP Intermediate Holdings Pty Ltd
(ABN 33 637 084 381)

Emergent Cold Topco Pty Ltd
(ABN 80 622 089 909)

Emergent Cold Midco Pty Ltd
(ABN 59 622 098 293)

Emergent Cold Bidco Pty Ltd
(ABN 24 622 102 041)

Emergent Cold Holdings Pty Ltd
(ABN 88 000 106 141)

Emergent Cold Pty Ltd *
(ABN 14 059 512 159)¹

Lineage AUS TRS Pty Ltd *
(ABN 57 640 590 147)*

Auscold Logistics Pty Limited
(ABN 88 129 265 247)

Emergent Cold Midco 2 Pty Ltd
(ABN 84 627 081 083)

Emergent Cold (Vic) Propco Pty Ltd
(ABN 30 627 086 980)

Emergent Cold (Vic) Pty Ltd
(ABN 35 627 085 750)

AB Oxford Cold Storage Company Pty Ltd
(ABN 15 005 104 361)

AB Oxford Cold Storage Company No. 2 Pty
Ltd (ABN 29 112 024 861)

Emergent Cold Midco 3 Pty Ltd
(ABN 17 008 579 879)

VIETNAM

Emergent Cold Vietnam Company Limited

Ha Noi Steel Pipe Joint Stock Company

SK Logistics Investment Joint Stock Company

SRI LANKA

Emergent Cold (Private) Ltd

¹ Entities with an *asterisk beside their name constitute a “reporting entity” as that term is defined in section 5 of the *Modern Slavery Act 2018* (Cth). This statement represents a joint statement issued on their behalf by LAP given the substantial similarities across each entity’s board, senior management, business, policies and supply chains.