



## Modern Slavery Statement FY 2025

This statement is published and approved by Mainfreight UK LTD (Company No. 10067164), hereinafter "Mainfreight", in accordance with the UK Modern Slavery Act 2015. This statement will be published on our website.

The Statement provides an overview of Mainfreight's policies and due diligence processes relating to the risk of modern slavery within our operations and supply chains. Mainfreight is committed to respecting human rights, and reducing the risks of modern slavery within our supply chains.

### Our business

Mainfreight is indirectly owned and controlled by Mainfreight Limited (New Zealand). Mainfreight Limited commenced operations in Auckland, New Zealand in 1978 and has since grown to operate 337 operational branches in 27 countries (across New Zealand, Australia, Asia, Americas and Europe), with approximately 11,000 team members. Mainfreight provides full supply chain solutions, which substantially include:

- Air & Ocean** customs clearance, freight forwarding, (domestic and international) transportation of goods by air and sea including road pick-up and delivery (door-to-door), packing/unpacking of containers and regulatory clearance;
- Transport** (domestic and international) road transportation of primarily palletised freight including dangerous goods;
- Warehousing** storage of customer's goods, bonded warehouse management, management of inbound/outbound orders and inventory management amongst other value-added services.

Within the United Kingdom, we are now operating 5 branches. Our current operations consist out of Air & Ocean, Transport and Warehousing services. Our branches offer services to customers both in the United Kingdom and abroad, including our subsidiaries across the globe. We focus on using Mainfreight Limited subsidiaries for all freight movement. When we don't have our own facilities or equipment available yet, we must engage third-party shipping companies, airlines, and carriers.

### Modern slavery risks

Modern slavery, as defined under the UK Modern Slavery Act 2015, includes the offences of slavery, servitude, forced or compulsory labour, and human trafficking. These offences involve situations where individuals are controlled, coerced, or deprived of their liberty for the purpose of exploitation.

As a service-based business, we are not significant procurers of upstream materials, and our value chain is comparatively limited. Nevertheless, we recognise that our activities may be exposed to modern slavery risks, particularly where labour standards vary between countries. The nature of our operations means there is a possibility that we could unknowingly be linked to potential cases of modern slavery, including through subcontracted labour or service providers operating in regions with lower levels of worker protection.



## Managing modern slavery risks

Mainfreight recognises that robust governance and oversight are essential to preventing and identifying modern slavery risks across our operations and supply chains. Our established group corporate governance framework, including our Group Code of Ethics, Whistleblower framework, and global compliance structures, provides a strong foundation for managing ethical, legal, and operational risks and helps ensure consistent standards throughout all regions in which we operate.

Wherever possible, we operate through Mainfreight Limited subsidiaries, which enables greater visibility and control over day-to-day activities. This structure allows us to rely on Mainfreight's well-established culture of integrity and lawful conduct, supported by our governance policies and oversight mechanisms.

Where third parties are engaged to provide services, within the United Kingdom or internationally, we prioritise working with well-known, reputable, and long-standing partners, including shipping lines, air carriers, and logistics service providers. In our road transport operations, we focus on establishing long-term partnerships with subcontractors and, where appropriate, utilise recognised third-party networks across Europe. These relationship-based approaches support stronger oversight, clearer expectations, and better alignment with our ethical standards.

Through these measures, and supported by our corporate governance system, we work to mitigate the risk of unintentionally contributing to modern slavery and to ensure that service delivery across our operations and supply chain remains responsible, transparent, and ethically aligned.

## Relevant policies

Mainfreight operates within a comprehensive group-wide governance and ethics framework that helps prevent modern slavery and human trafficking and supports safe, lawful, and ethical working practices across all regions. This framework is supported by additional UK-specific policies that reinforce local compliance expectations.

### Group Policies

**Group Code of Ethics** – Sets clear expectations for ethical behaviour, integrity, and lawful conduct, and outlines the process for reporting concerns.

**Whistle-Blower Policy** – Provides a confidential channel for raising concerns about wrongdoing, including labour-related issues, with protection against retaliation.

**Remuneration Policy** – Ensures fair and transparent pay practices, reducing vulnerability to exploitation.

**Anti-Corruption & Anti-Competitive Practices Guidelines** – Promote honest commercial conduct and responsible procurement, helping reduce the risk of exploitative practices in our supply chain.

**Diversity Policy** – Supports fairness, inclusion, and non-discrimination, helping protect vulnerable groups.



**Board Charter** – Defines the Board’s responsibility for ensuring high standards of ethics, corporate governance, business risk oversight, and compliance with applicable legal obligations. This governance oversight helps support our adherence to the UK Modern Slavery Act.

**Audit Committee Charter** – Sets out the Committee’s role in overseeing financial reporting, risk, and compliance, ensuring the organisation meets its regulatory responsibilities. This includes supporting appropriate internal controls relevant to ethical and legal compliance across the business.

### **Local UK & European Policies**

**European Code of Ethics & Conduct** – Reinforces Mainfreight’s ethical expectations within the UK and European context and supports safe, fair labour practices.

**UK Grievance Procedure** – Provides team members with a formal and confidential way to raise concerns, including potential indicators of modern slavery, ensuring issues are promptly and appropriately addressed.

### **Due diligence**

As part of our due diligence processes, all prospective team members are personally interviewed, supported by background checks on their previous employment to ensure they meet Mainfreight’s ethical expectations.

In the United Kingdom, we also conduct mandatory passport and visa checks to verify each individual’s legal right to live and work in the country. These measures act as an important safeguard against illegal working and support our efforts to prevent modern slavery and related exploitation risks.

### **Measuring effectiveness**

All our UK branches are audited annually by our Training & Development team, covering Mainfreight culture and a range of operational and quality-related topics. These audits help us assess whether our practices continue to align with our ethical expectations and broader compliance obligations.

Where audits identify areas that do not meet expectations, corrective actions are put in place to support continuous improvement and ensure ongoing compliance.

### **Training**

Our Training & Development team delivers a range of training programmes for team members, including a mandatory induction programme and integrity training for all new starters. These courses are reviewed regularly to ensure they remain up-to-date and aligned with Mainfreight’s culture, policies, and legal responsibilities.

Team members are also required to complete integrity training again whenever their role or responsibilities change. This helps maintain ongoing awareness of ethical conduct expectations and reduces the risk of unethical or non-compliant practices within our operations.

Mainfreight UK Limited

Ben Fitts  
Director

A handwritten signature in blue ink, appearing to be "Ben Fitts", written over a horizontal line. The signature is stylized and extends to the right.