



Modern Slavery Statement

Year Ending 31 December 2025



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Introduction

Lineage Inc. is the world's largest temperature-controlled warehousing real estate investment trust (**REIT**), offering a network of strategically located cold storage facilities and end to end transport solutions across North America, Europe and the Asia Pacific. Lineage Inc. has grown extensively over the last fifteen years both organically and by way of acquisition. It is incorporated in the United States of America and is listed on the Nasdaq Global Exchange under the ticker symbol 'LINE'.

Lineage Inc.'s purpose?

To transform the world's food supply chain to eliminate waste and help feed the world.

Through Lineage Inc.'s Global Warehousing and Global Integrated Solutions operations, it partners with food and beverage companies to help increase cold chain distribution efficiency, advance sustainability, minimize supply chain waste and, most importantly, feed the world. More information on Lineage Inc. is available at: [Lineage | Global Cold Storage Warehousing & Integrated Solutions \(onelineage.com\)](https://onelineage.com).

Lineage Inc.'s Asia Pacific region operates facilities in Australia, New Zealand, Singapore, Vietnam, Sri Lanka and, through a joint venture, in China (the **Lineage APAC Group**). Currently, most of the revenue for the Lineage APAC Group is earned through the Australian business. Lineage Inc. is the ultimate parent entity of the Lineage APAC Group.



While from a business perspective, the Asia Pacific region covers a broad geographic area, in light of the 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 are referred to as our **the Group Operations** throughout this statement.

This Modern Slavery Statement has been prepared in respect of the year ending 31 December 2025 by Lineage AP Holdings Pty Ltd (ABN 27 637 083 544) (**LAP**), the parent entity of the Group 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.



Commitment

Lineage Inc. is driven by a culture of continuous improvement and six core Values, with Safe being of the utmost importance.



SAFE

Lineage's priority is that every team member returns home from work safely every day.



RESPECT

Our shared interests are prioritized over any individual or team, and we strive to act and treat each other with humility.



BOLD

At Lineage, we challenge norms, take informed risks and make tough decisions as we embrace change and the challenges that come with it.



TRUST

We believe that each of our team members plays a key role in our success, and we expect and seek to foster a fear-free work environment for all team members.



INNOVATION

Challenges are welcome here: We are eager to engage them, and we seek to solve them with boundless creativity as we seek to fulfill the evolving needs of our customers.



SERVANT LEADERSHIP

We strive to create a positive work environment where leaders and team members alike focus on meeting the needs of the people and organizations they support.

Aligned with these Values, Lineage Inc.'s commitment to working ethically, responsibly and with integrity is captured in its global "Strengthen the Chain" Code of Conduct, a copy of which can be found at: [Lineage | Ethics and Compliance at Lineage \(onelineage.com\)](https://www.onelineage.com/ethics).

The Code of Conduct applies to all officers, directors and team members wherever Lineage Inc. does business and, of particular relevance to this report, includes a section on the selection and management of third parties. The Code is organised into three main areas, namely:

- Acting respectfully and responsibly in the workplace;
- Working ethically with customers, suppliers and other stakeholders; and
- Supporting surrounding communities and protecting the planet.

Underpinning ongoing compliance with the Code of Conduct is the importance of Lineage Inc.'s Speak Up program through which team members and third parties are encouraged to report any concerns about misconduct or potential misconduct. Lineage Inc. has established an Ethics Hotline for this purpose, the details of which are set out later in this statement. The Speak Up Policy and related procedures all clearly reflect Lineage Inc.'s commitment to support anyone who speaks up in good faith. Lineage Inc. will not tolerate any retaliation or victimisation as part of its speak up program. In the event a modern slavery concern is identified, Lineage Inc. would adopt an end-to-end due diligence approach – identify, assess, mitigate, monitor and remediate – with actions including supplier engagement, corrective action plans, and measures focused on worker protection.



Lineage Inc.'s global Supplier Code of Conduct, which our suppliers are required to acknowledge, sets clear expectations with respect to integrity and human rights; quality; health & safety and the environment. Relevantly, it includes a requirement that suppliers should responsibly source materials and should undertake reasonable efforts to perform due diligence within their supply chain.

Additionally, Lineage Inc.'s global Anti-Corruption Policy, which prohibits bribery and corruption, governs the provision and receipt of gifts and entertainment, which is available at: [Lineage | Anti-Corruption \(onelineage.com\)](https://onelineage.com/anti-corruption).

Lineage Inc.'s environmental, social and governance initiatives are captured in Lineage Inc.'s 2024 Sustainability Report, which is available at: [Lineage | Sustainability \(onelineage.com\)](https://onelineage.com/sustainability). This report provides an overview of Lineage Inc.'s commitment to sustainability.

Additionally, we released our first sustainability report for the year ended 31 December 2025, pursuant to the AASB Australian Sustainability Reporting Standard S2 Climate-related Disclosures as issued by the Australian Accounting Standards Board and the *Corporations Act 2001* (Cth).

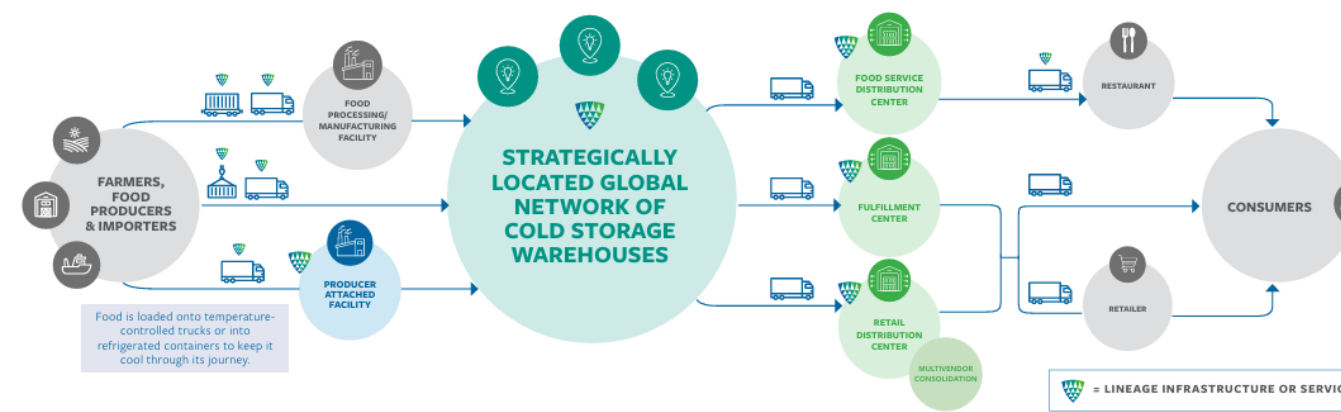
For the Group Operations, our approach to modern slavery is one of continuous improvement where we look to strengthen our approach to vendor management year on year by building on the previous actions we have taken to identify and, where applicable, address ethical risks in our supply chain. We support 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*.



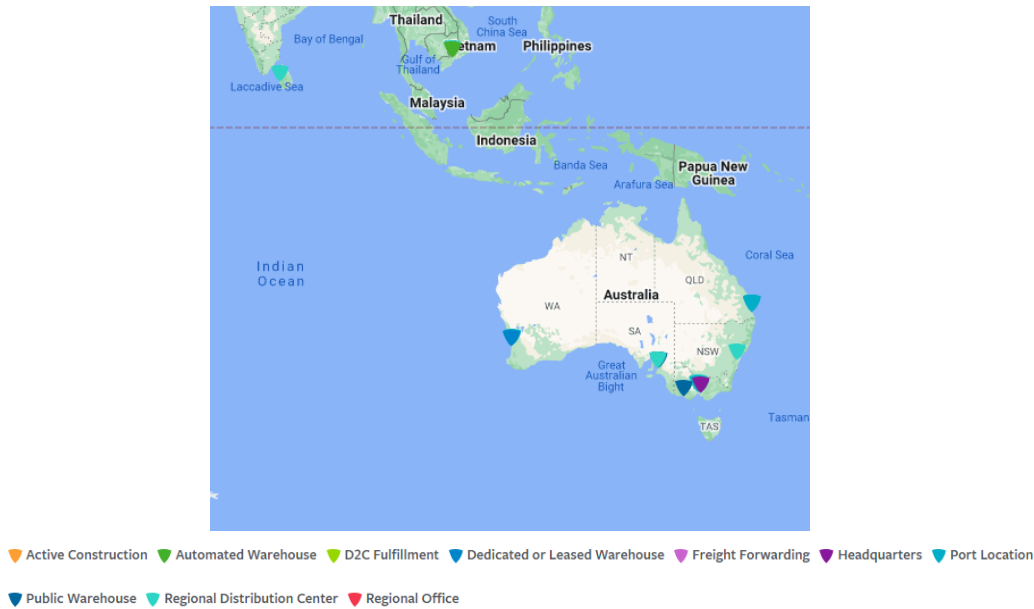
Structure, Operations and Supply Chain

Overview

Lineage Inc. owns and operates income-producing real estate across its global operations and is structured as a REIT. Lineage Inc. provides warehouse storage, handling and transportation services to customers in all sectors of the food and beverage marketplace and many of its sites are licensed to support the export of food products to other countries.



Lineage Inc. has 501 strategically located facilities worldwide totaling over approximately 88 million square feet and 3.1 billion cubic feet of capacity. The locations of the Group Operations are shown below.





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 focused on interrogating our supply chain to ensure those risks are identified and prevented or mitigated.

Operations

Lineage Inc. employs approximately 24,000 individuals from around the world, just less than 10% of which are based in the Asia Pacific region. The Group Operations employs approximately 1,200 people in Australia, 550 people in Vietnam and 75 people in Sri Lanka. For completeness, the Lineage APAC Group also employs approximately 450 people in New Zealand and 90 people 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 Group Operations also utilises 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 Group Operations could be in the range of 440-475 workers. Our labour hire workers perform operational and administrative roles in our warehouse operations, including working as pickers, packers, forklift operators and container loaders and unloaders.

Supply Chain

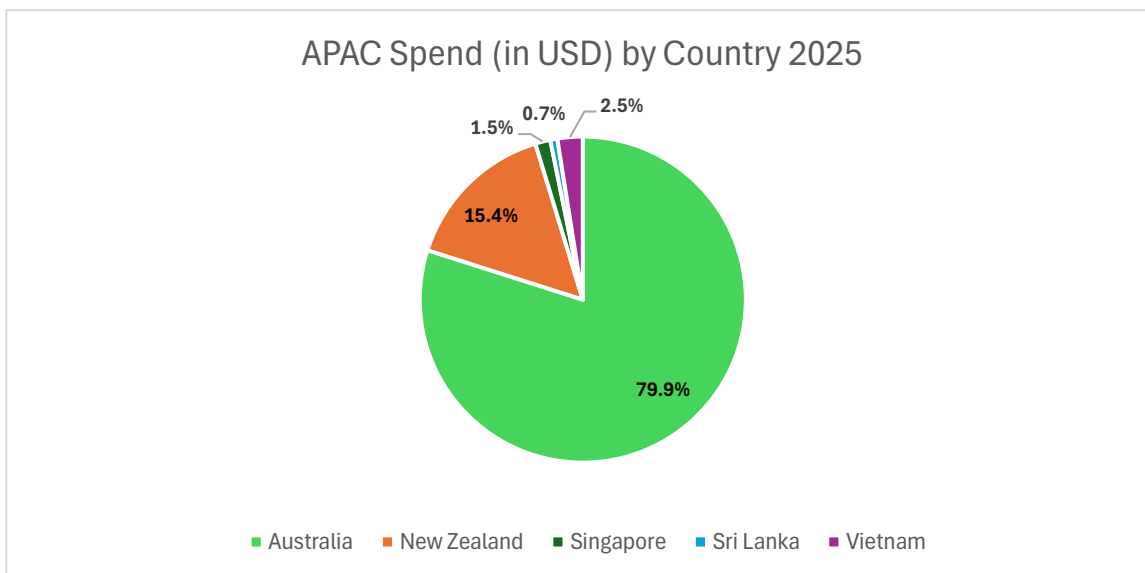
During the reporting period, the Lineage APAC Group engaged 2,605 third party suppliers and the Group Operations engaged 1,721 third party suppliers; 1,030 in Australia, 427 in Vietnam and 264 in Sri Lanka. For completeness, the Lineage APAC Group also engaged 698 suppliers in New Zealand and 186 suppliers in Singapore. For the Group Operations, we predominantly use 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: manual handling equipment (**MHE**), batteries for MHE, trailers, tyres, personal protective equipment and office supplies; and
- with respect to services: utilities (electricity), electricity management services, labour hire services, warehouse leasing, transport services, waste removal services, cleaning services and insurance.



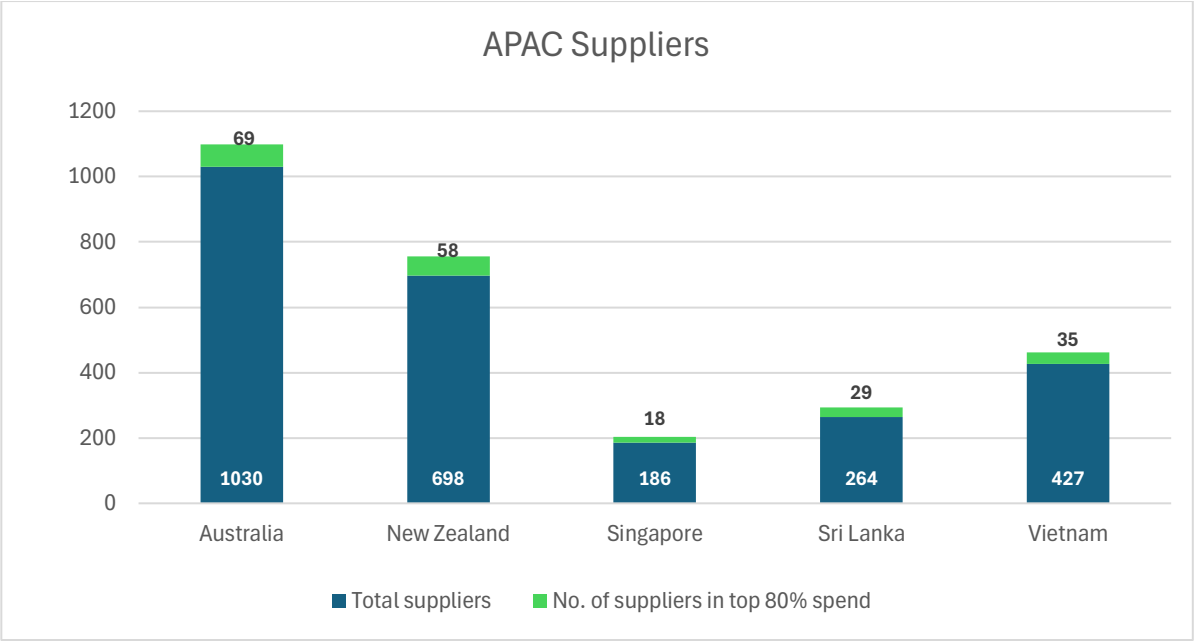
The following chart shows the spend per country for the Lineage APAC Group for the 2025 reporting year.



As shown above, 95% of the overall spend for the Lineage APAC Group for the 2025 reporting year was in Australia and New Zealand, with 80% of that being in Australia.

Applying the Pareto Principle to the supply base for the Group Operations, during the reporting period, 80% of our overall spend for the Group Operations was with 133 of the 1,721 third party suppliers. Additionally, 96% of our overall spend for the Group Operations was with 69 of our 1,721 third party suppliers (and all 69 of those suppliers were suppliers to the Australian business).

The key procurement categories within this Australian cohort of suppliers are operations related (for example, electricity, labour hire for our warehouse operations, refrigeration systems (including maintenance), purchase of MHE, the procurement of transport services or vehicles and facility related services and supplies, including utilities and cleaning). 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 supplier segmentation.





Risks of Modern Slavery

Operations

Overall, 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.

Mandatory training on Lineage Inc.'s global Code of Conduct is required for all new employees as part of the onboarding process, and then annual training on the same is provided to existing employees across the organisation to ensure ongoing coverage throughout the year. During the reporting period, the annual Code of Conduct training was delivered globally through to 30 November 2025. Lineage Inc.'s corporate policies are communicated to our team members through online training programs, toolbox talks, posters and other means to clearly establish safety, conduct and other expectations for our workforce. Such communications are translated for ease of reference where applicable.

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 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 several inherent exposure points within our operations and supply chain as described 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.

Shipping

The Group Operations utilises shipping for export purposes, particularly in jurisdictions which produce food more than domestic requirements, where there is a geographic reliance on maritime transport or if operating in export-oriented economies.

We acknowledge that there is an inherent risk of modern slavery in shipping, as shipping



We move and store food products, including seafood and rice, which may be connected to modern slavery in relevant regions.

Invisible workforce

Cleaning, janitorial, construction and IT services are industries that form part of the invisible workforce of the Group Operations. 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 we procure many of these services through contractors and other third parties, often with limited control over these supply chains, we understand that any suspected modern slavery practices by contractors or providers of IT goods still fall within our supply chain.

We also acknowledge 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.



freight providers can be at risk of labour rights violations such as forced labour. The shipping companies that deliver the products we pick, pack and store and / or transport those products overseas are engaged by our customers. We are not involved in the selection and management of those providers.

Land Transport

Different companies within the Group Operations have different types of arrangements with land transport drivers. Some employ drivers directly, others engage drivers as contractors (or utilise 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.

During the reporting period, our Australian business employed drivers to drive our linehaul vehicles, engaged labour drivers and engaged contractors to undertake transport activities on our behalf.

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 the Group Operations, the Global 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 recognise that electronics, electrical equipment and construction materials can be associated with low-skilled workers, especially where the supply chain for those products commences in high-risk countries. As noted, we



predominantly procure products and services from within the country of operation.

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



Actions Undertaken in 2025

Actions

To demonstrate continuous improvement, the steps we took in the 2024 reporting year to identify and prevent or mitigate the risk of modern slavery in our supply chain are set out in Annexure B.

Over the course of 2025, we have sought to further assess and address modern slavery risks, including through the ongoing analysis of our spend with, and the segmentation of, our third-party vendors with our Procurement team and to more formally capture our approach to modern slavery in policies, procedures and guidance notes.



Our 2024 statement reflected the proposed actions we intended to take in 2025, and the status of each of these actions is set out in the table below.

#	2025 ACTION	DESCRIPTION OF 2025 ACTION	STATUS
1.	Introduce a global Supplier Policy	During the 2025 reporting year, our global Procurement team intended to introduce an updated, global Supplier Policy. The policy would govern all sourcing activity undertaken by Lineage and: • set thresholds for when the regional, centralised Procurement team is to lead the sourcing activity; • provide guidance on when a formal RFP process is to be undertaken; • set clear pre-qualification requirements for suppliers, including with respect to human rights; • establish parameters on vendor management generally.	Complete. The global Supplier Policy was launched in May 2025 and has been sent to all employees to read and acknowledge. Implementing the global Supplier Policy drives engagement with partners who meet our ethical, environmental, and security expectations. The Supplier Policy aims to streamline supplier selection, ensure supplier accountability, lay out the validation process for new supplier requests, and assist in establishing long-term partnerships based on shared values and objectives.
2.	Introduce a global Purchase Order Policy	The global Procurement team was to implement a new global Purchase Order policy which, together with the new PO terms and conditions developed in 2024, would support greater consistency in and validation of sourcing activities.	Complete. A global Purchase Order Policy was launched in January 2025. More than 30 training sessions were delivered across Australia, New Zealand, Singapore and Vietnam throughout 2025.



#	2025 ACTION	DESCRIPTION OF 2025 ACTION	STATUS
3.	Supplier Audit Program	We would continue to undertake supplier questionnaires and ad hoc audits of our suppliers, particularly those in identified industries at higher risk of modern slavery, to assess their maturity in managing potential risks of modern slavery.	Ongoing. This program of work continued over the reporting period and will remain part of our approach to mitigating modern slavery risks.
5.	Review of Modern Slavery collateral	With the new regional Procurement team established in the business, we stated our intention to undertake a review and refresh of our modern slavery supporting documentation.	The review and refresh of our modern slavery collateral commenced in 2025, but its finalization was delayed into Q2, 2026. This work has formalized the Group Operations' modern slavery framework, including a Supplier Information Sheet to supplement the Supplier Code of Conduct. Additionally, we have introduced a questionnaire that suppliers must respond to as a condition of participating in a tender, which includes questions relating to safety and modern slavery.
6.	Continuation of 2024 Actions	A number of actions commenced during the 2024 reporting period and were expected to continue into 2025, including embedding our refreshed contractor management framework; progressing our global financial crime prevention program; and refreshing our procurement precedent suite, in particular, our template agreement for the receipt of transport services.	An updated contractor management framework has been embedded in our Australian Transport operations and the approach for our warehousing operations is continuing to be revised, with implementation expected by Q4, 2026. Lineage Inc.'s Corporate Compliance & Ethics team continues to develop the global financial crime prevention program, and this work will continue into 2026, including risk assessment procedures and targeted communication around speak up and ethical culture. Key activities in 2025 included the implementation of ongoing sanctions screening procedures and incorporation of third-party risks in the annual Code of Conduct training cycle. The refresh to our suite of procurement templates continued during 2025, with a new Goods &



#	2025 ACTION	DESCRIPTION OF 2025 ACTION	STATUS
			Services Agreement for Vietnam; a short and long form Transport Services Agreement and an updated Consultancy Agreement being completed, among others.

Effectiveness of 2025 Actions

The day-to-day management of our modern slavery risk management program is a collaborative approach, being overseen locally by our centralised Asia Pacific Procurement and Legal teams in consultation with representatives from across the Group Operations, including Human Resources, Risk & Audit, Safety and Operations. From a global perspective, Lineage Inc.'s Sustainability team also monitors and contributes to the program. The LAP's Board of Directors is ultimately responsible for assessing the effectiveness of our modern slavery risk management program, which is also captured within the Lineage APAC Group's Asia Pacific Enterprise Risk Management framework, regularly reviewed by the regional Senior Leadership team.

During the reporting period, we have exercised a more robust approach to the sourcing of products and services, having regard to the new Procurement policies in place. We have increased the number of RFP's and/or direct negotiations undertaken in market as well as supplier arrangements on our standard terms and conditions, and greater rigour has been exercised in the onboarding processes for third party providers of transport-related services. During the reporting period, we also distributed the global Supplier Code of Conduct to suppliers with whom we spent over USD\$1 million per annum.

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 the global Speak Up Policy, which accommodates the legal and language requirements of different countries in which Lineage Inc. operates. Further, through living the Lineage Inc. Values of Safe, Trust and Servant Leadership, the 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 the 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.

The Speak Up Policy is open not only to team members, but to third parties as well. The details of the 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. Lineage Inc.'s global Corporate Compliance & Ethics team reviews disclosures to ensure they are escalated to the right team members for confidential assessment and action.



Lineage Ethics Hotline

You use 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 by phone, online, or by email.



Australia- 1-800-768-120	Poland- 0-0-800-141-0023
Belgium- 0800-262-67	Singapore- 8004922583
Canada- 866-360-0008	South Africa- 080 098 2093
Denmark- 80 25 42 15	Sri Lanka- 9-072-0987140
France- 0805-080039	Spain 900-963267
Germany- 0800-183-0724	United Kingdom- 0-808-189-0041
Italy- 800 743 075	United States of America – 866-360-0008
Netherlands- 0800- 023-3064	(English) or 800-216-1288 (Español)
New Zealand- 0800 823 509	Vietnam 120-32121
Norway- 800 62 472	



Submit a report online at onelineage.com/speakup



Send an email to ethics@onelineage.com, making sure to include our company name in the email.

In terms of the number of matters raised with the Ethics Hotline during the 2025 reporting period for the Group Operations, one matter was related to Australia, which did not relate to issues pertaining to modern slavery.



2026 Actions

With the Group Operations 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. Over the last two years, we have been focused on introducing, or strengthening existing, initiatives to further address modern slavery risks in our supply chain, particularly at the front end of sourcing and onboarding suppliers. For 2026, our focus will move to the assurance part of the supplier management life cycle.

#	2026 ACTION	DESCRIPTION
1.	Modern Slavery Supplier Information Sheet	The regional Procurement team will begin including our new Supplier Information Sheet in RFP packs in 2026. During the 2026 reporting year, our regional Procurement team also intends to distribute this information sheet to all suppliers in the top 80% of our APAC spend.
2.	Supplier Questions in RFPs	Our regional Procurement team will review and, as appropriate, update the modern slavery-related questions we ask of potential suppliers as part of RFPs. The intention is that these questions can also be utilized as part of any assurance validation process, demonstrating consistency in our expectations.
3.	Conflict of Interests training and disclosure program	While not strictly modern slavery related, Lineage Inc.'s Corporate Compliance & Ethics team intend to undertake a Conflicts of Interest training and disclosure program for all APAC team members who oversee, or have a touch point with, sourcing activity to ensure potential or perceived conflicts in sourcing decisions are identified and managed appropriately.
4.	Competitive tender processes	We will continue to undertake competitive sourcing events and, to this end, expect to go to market for waste removal services, cleaning services and labour hire related services in 2026, which will provide a due diligence opportunity in respect of potential providers.
5.	SEDEX Onboarding	The global Sustainability team will commence an onboarding process to SEDEX for our Asia Pacific based sites, including those within the Group Operations.
6.	Supplier Assurance Program	The global Sustainability team, together with the Lineage APAC Group's regional Procurement and Legal teams, will look to utilize a SEDEX audit program as part of our approach to supplier assurance with respect to modern slavery risks.
7.	Continuation of other 2025 actions	We will continue actions commenced during the 2025 reporting period, including implementation of our updated contractor management framework into our warehousing operations.

Consultation and Approval

This statement is a result of consultation and collaboration across our business, including with Procurement, Operations, Human Resources, Sustainability, Corporate Compliance & Ethics, Legal and Safety. The members of the Group Operations (as listed in Annexure A) share substantial similarity in their appointed officeholders, and the Lineage APAC Group's regional Senior Leadership team is responsible for the day-to-day management of the Group 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 25 June 2026 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.

Signed by:

Craig Bowyer

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Craig Bowyer

Director

26 June 2026





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)

Bigstreet Pty Ltd
(ABN 63 086 073 958)

VIETNAM

Emergent Cold Vietnam Company Limited

Ha Noi Steel Pipe Limited Liability Company

SK Logistics Investment Limited Liability 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.



Annexure B: 2024 Actions

#	2024 ACTION	DESCRIPTION OF 2024 ACTION	STATUS
1.	Build Procurement Team	We advised that a Senior Procurement Officer for our Vietnam business, reporting into our Senior Procurement Manager for Asia Pacific, would be appointed.	A new Senior Procurement Officer for Vietnam was appointed in early 2024. However, our regional Procurement team underwent a period of change in 2024 after our Senior Procurement Manager, Asia Pacific resigned. Our new Senior Procurement Manager for the region commenced in October 2024 and they are supported by a small team, including a Senior Procurement Officer in Vietnam and a regional Procurement Analyst.
2.	Lineage Group's Global Financial Crime Prevention Program	We noted that, as part of our ongoing continuous improvement journey, the Lineage Group's global Corporate Compliance & Ethics team had commenced a project to further strengthen our prevention and mitigation of financial crimes. As part of this project, it was advised that an automated third party screening solution would be developed and integrated into our supplier onboarding process. The new system was expected to be in place for the Asia Pacific region by December 2024.	The work to implement this system is ongoing. A third party screening solution has been established using a reputable external platform. Further work is being undertaken over the course of 2025, including the release of additional updated global policies and procedures to 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.
3.	Supplier Audits	We stated that we would 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 were to undertake deeper analysis of our vendors within the 80% category (see above) with the initial focus being on Australian suppliers in higher risk categories from a modern slavery perspective.	During the 2024 reporting period, we completed the contemplated assurance activities with no adverse findings being identified in respect of modern slavery risks. We also reviewed our approach to vendor management and the level of assurance we require with respect to our operational and compliance related expectations and this will continue into 2025.
4.	New Precedents	We advised the Legal team would work with the Procurement team to implement a refreshed set of precedent sourcing documents, including new Purchase Order terms and conditions	The new Purchase Order terms and conditions are now effective in each country in our Asia Pacific operations, together with other new procurement precedent documents, including a



#	2024 ACTION	DESCRIPTION OF 2024 ACTION	STATUS
		for each country in our Australian Operations.	Master Services Agreement. a Minor Works Agreement.
5.	Contractor Management Framework	We noted that, with a view to strengthening our contractor management framework, we would 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 would be incorporated.	The Contractor Management project commenced in late 2024 and continues into 2025. The scope of the project was broadened to cover the life cycle of contractor engagement. A refreshed set of contractor management tools are under development and, once finalised, will be rolled out in Australia and New Zealand ahead of our other Asia Pacific countries. The framework will align with our other procurement governance documents, particularly with respect to pre-qualification and ongoing performance assurance.
6.	Competitive tender processes	We undertook to expand our tender process for the Australian Operations.	A number of competitive sourcing events were undertaken during the 2024 reporting period, including for site cleaning services.
7.	Risk Management	Finally, we noted that our Risk & Audit team had completed an indepth review and update of our Enterprise Risk Management framework, which our Senior Leadership team would continue to use as a proactive and systematic mechanism for identifying key risk domains, including modern slavery risks.	Our refreshed Asia Pacific Enterprise Risk Management framework, and the ongoing consideration of existing and emerging risks by our regional Senior Leadership team, is now embedded in a regular meeting and review cadence. An online platform has been created to record the enterprise risks of our Asia Pacific operations and provide an efficient review and update process.