GCW

Modern Slavery Statement

1. Introduction

GCW Holdings acknowledges that modern slavery is a multifaceted human rights challenge requiring a concerted global response from all who have the capacity to effect change. Our businesses operate within a complex ecosystem, and we are committed to respecting human rights right across our business and dedicating ourselves to understanding, assessing, mitigating and addressing modern slavery risks throughout our business entities, operations, and supply chains.

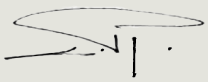
GCW Holdings Pty Ltd presents this modern slavery statement as a consolidated declaration in accordance with the Commonwealth Modern Slavery Act 2018 for the fiscal year spanning from 1 January 2024 to 31 December 2024.

Modern slavery encompasses a range of exploitative practices including human trafficking, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment for labour or services, as well as the most egregious forms of child labour. It inflicts profound harm on its victims and often has a disproportionate impact. For GCW, a crucial priority is reducing the risk of modern slavery within its supply chains. Specifically, ensuring individuals can make choices freely, without the undue influence characteristic of modern slavery situations, is fundamental.

GCW is dedicated to conducting its business in a responsible and ethical manner, ensuring that every aspect of our operations, supply chains, and associated networks remain untainted by any form of slavery. We adhere to a strict zero-tolerance policy towards human rights violations, including modern slavery, within our operations and supply chains. We hold our employees, suppliers, subcontractors, and agents to the same high standards, expecting them to embrace and uphold these principles. It is our expectation that our business activities are carried out in full compliance with all relevant modern slavery laws, which encompass the prohibition of unpaid or inadequately paid servitude, human trafficking, and forced labour.

As GCW expands in our highly competitive sectors, we are dedicated to working closely with our employees, customers, suppliers, and shareholders. Our aim is to strengthen and enhance our capacity to address the challenges posed by modern slavery and to safeguard the fundamental human rights of all individuals associated with us.

Craig Page
Managing Director of GCW Holdings Pty Ltd
31.05.2025



2. Our Structure, Operations and Supply Chains

GCW Holdings owns and manages a portfolio of relocations, project logistics and information management businesses. Our portfolio includes some of Australia's leading service industry brands such as Grace Removals, Grace Information Management, MoveDynamics and Crown World Mobility. We have a proud heritage of success, quality and innovation. Our commitment to continuous improvement is at the heart of our culture, and we are constantly looking for ways to exceed customer expectations.

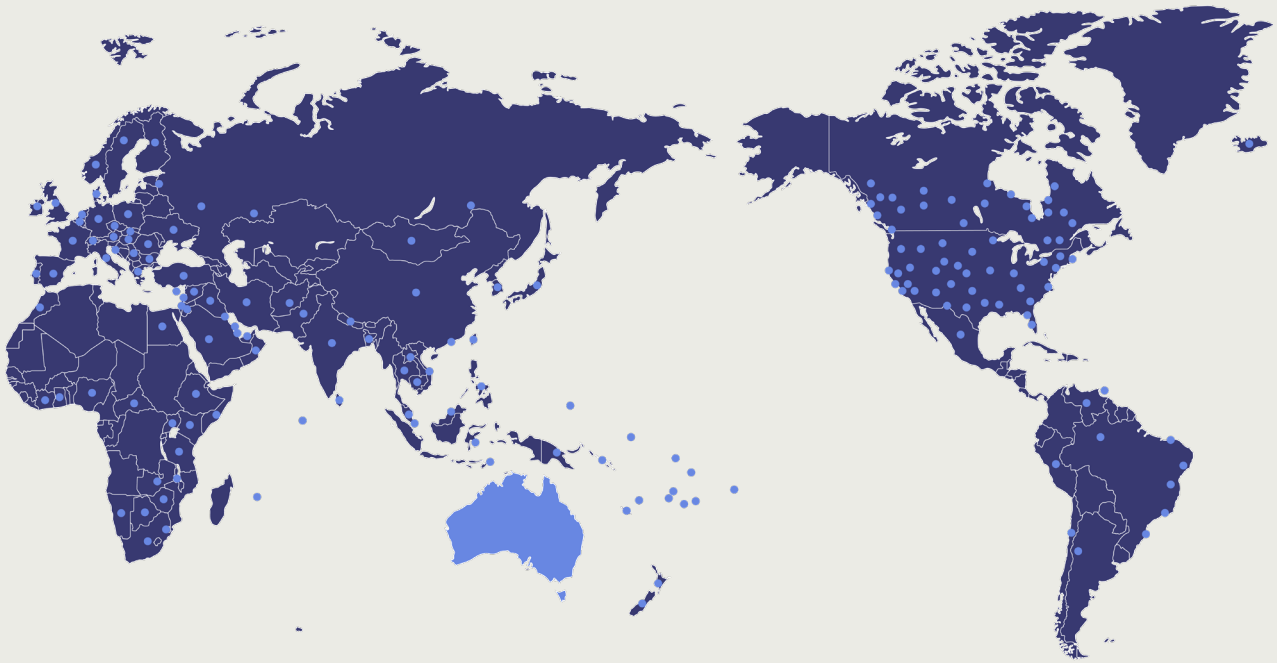
Controlled entities

GCW Holdings Pty Ltd (ABN: 90 090 345 845) is the reporting entity for this statement. The following wholly owned entities are included in this statement:

Entity	ABN	Description
Grace Group Properties (Australia) Pty Ltd	80 112 427 282	The entity holds all group properties in Australia
Grace Removals (Australia) Pty Ltd	35 083 330 223	This entity is engaged in household goods removals, storage, corporate staff relocations, fine art logistics and commercial project logistics.
Grace Records Management (Australia) Pty Ltd	93 097 110 257	This entity is engaged in document storage and management, workplace digitalisation and secure records destruction.
Crown Worldwide (Australia) Pty Ltd	12 127 193 757	This entity is engaged in corporate staff relocations and household removals and storage.
Move Dynamics Pty Ltd	83 098 988 348	This entity is engaged in corporate staff relocations.
Intercept Information Solution Pty Ltd	NA	This entity is engaged in removals associated risk and compensation management.
Grace FF&E Installations Pty Ltd	93 057 403 620	This entity is engaged in commercial project logistics.

Operational Footprint - GCW Branch Locations

Operational Footprint - Global Partner Network



CROWN RELOCATIONS

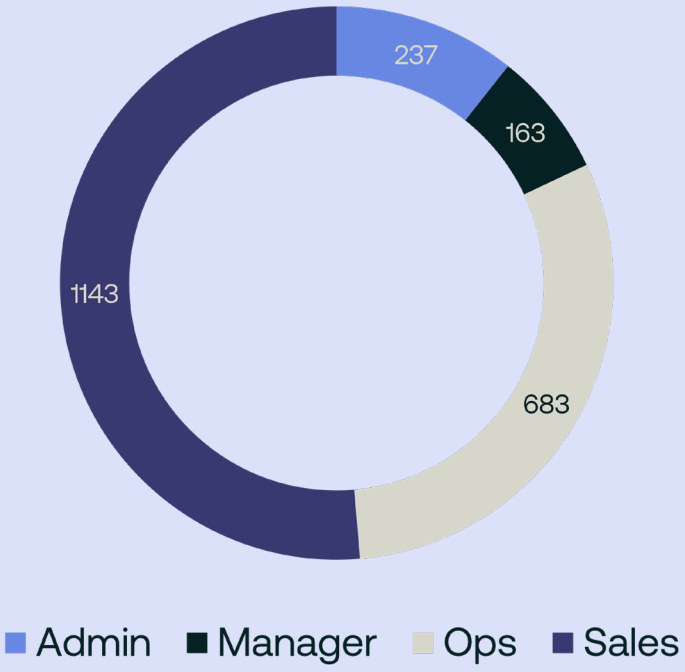
FAIM FIDI ACCREDITED INTERNATIONAL MOVER

Our Team

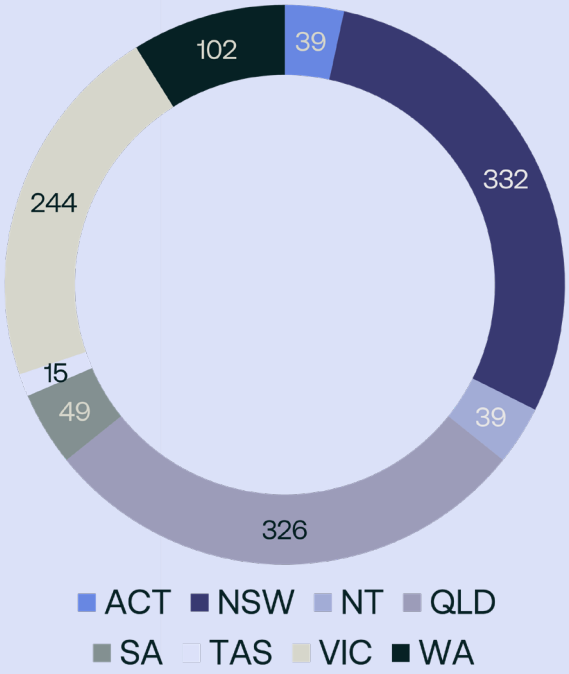
GCW employs over 1,100 team members in Australia, primarily in sales, operations, and management positions across its Grace Removals, Grace Records Management, MoveDynamics, Smartbox, Intercept and Crown Australia divisions. A dedicated team, directly employed by GCW Holdings, performs critical administrative and management roles for the group.

For temporary or ad-hoc roles, especially in our removals and records management sectors, GCW utilises labour hire contractors. The group also collaborates with subcontractors and fleet operators to bolster its removals and relocation services.

Employees by role



Employees by state



Our Supply Chain

Our supply chain is comprised of an extensive and complex network, encompassing a diverse range of customers and suppliers. It can be divided into two main segments.

- Customer Goods - We manage, store, transport, and distribute a wide array of goods and products for more than 80,000 clients, encompassing used personal items, documents, freight forwarding, and more. Our services cater to both B2B and B2C customers, with operations spanning all Australian states and territories as well as international locations.
- Procurement (Non-Trade) - Our procurement encompasses a wide variety of goods and services from more than 8,900 direct suppliers. These non-tradeable items are essential for supporting GCW's operations. For instance, we source ocean, air and rail freight, uniforms, packaging, maintenance, infrastructure, installation services, hardware, technology solutions, marketing services, transportation, construction materials, labour hire, and subcontractors.

3. Our Modern Slavery Risks

The risks of modern slavery within our customer base and supply chain are diverse and multifaceted.

Defined by the Australian Government, modern slavery encompasses situations of 'serious exploitation', utilising coercion, threats, or deception to exploit victims, significantly diminishing or removing their freedom.

We acknowledge the existence of modern slavery and recognise that a myriad of factors can contribute to fostering dangerous or substandard working conditions. Without proper intervention, these conditions may escalate into modern slavery or serve as indicators of its presence.

Our long-standing commercial relationships with customers, suppliers, and service providers have built trust and minimised risks. Although this strategy is effective in mitigating potential risks, it cannot entirely eliminate them.

Our Operational Risk Profile

The GCW Group's activities span across all states and territories in Australia and reach almost every country internationally.

Around 60% of our workforce is governed by an enterprise bargaining agreement or Award, with the bulk of our recruitment managed in-house. The stringent standards, obligations, and protections enforced by Australian labour laws significantly mitigate the risk of modern slavery within our operations. These standards encompass, among others:

- Fair Work Regulations 2009
- Fair Work Act 2009
- National Employment Standards (NES)
- National minimum wage
- Registered Agreements
- Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Bill 2022

Specialist contractors are occasionally hired for specific projects or for roles in the removals and records management businesses. During these engagements, GCW and the contractor individually negotiate the terms of their agreement. Given these contracts and the balanced negotiating power between the parties involved, the risk of modern slavery is considered low.

GCW also hires labour on a temporary or as-needed basis, primarily for short-term tasks in the removals and records management industries. These employees are supplied to GCW through agreements with labour hire firms. Although the number of contractors from labour hire firms varies, GCW has established contracts with these firms to supply contract labour. These agreements mandate that the labour hire firms affirm their adherence to practices aimed at minimising the risk of modern slavery within their operations, ensuring that employees receive at least the minimum compensation required by applicable Awards.

Although GCW assesses the risk of modern slavery in this arrangement as very low, it recognises that employing third-party labour providers or engaging in practices with a higher concentration of migrant workers can lead to an increased risk of modern slavery.

The presence of one or more of these risk factors may indicate an increased vulnerability to modern slavery but does not necessarily mean modern slavery is occurring.

Goods (non-trade) and services used in GCW's operations, include:

Spend Category	%
Freight	30.9%
Cargo expenses	18.8%
Property expenses	9.6%
Disbursements	6.9%
International Agents	7.2%
Employee benefit expenses	5.6%
Insurance & claims	5.3%
Other Expenses	4.4%
Inventories	2.4%
Vehicle Expenses	2.2%
Property plant and equipment	2.2%
Raw materials and consumables used	1.9%
Communications and utilities costs	1.3%
Advertising costs	0.9%
Trade and other receivables (non-current)	0.4%
Grand Total	**100%**

Our Supply Chain Risk Profile

A portion of the GCW Group's business activities encompasses commercial project logistics. In these operations, we manage, store, transport, and distribute goods for our clients. Given that the supply chains for some of our clients' products are involved in manufacturing and span multiple geographic locations, there's a potential risk of modern slavery within these supply chains. In essence, the supply chains of GCW's clients could be directly associated with practices of modern slavery.

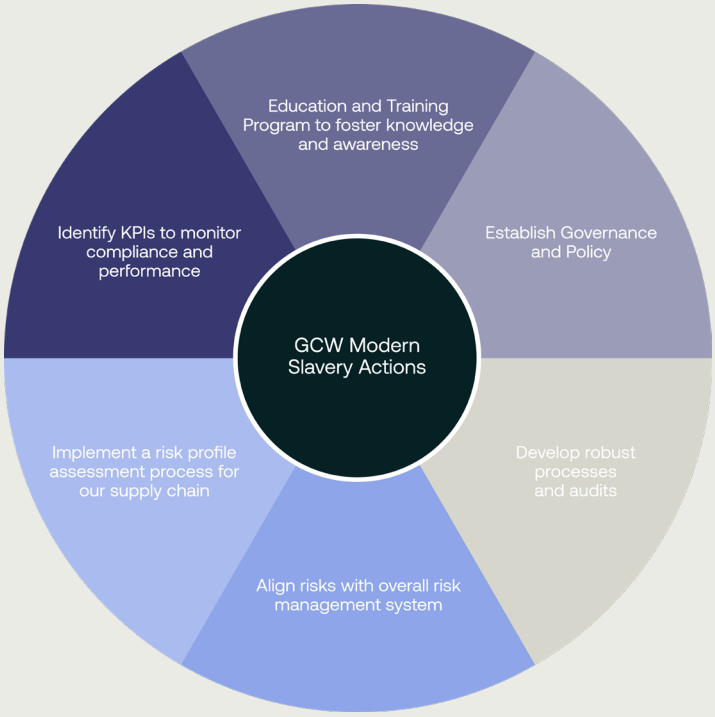
Modern slavery risks could also be present in various segments of our international freight and removalist operations that take place abroad. International freight services are offered through global container steamship lines and airlines, while offshore removals are predominantly conducted by a worldwide alliance of externally audited companies. These companies have all committed in writing to forbid unfair labour practices, including child labour, within their operations.

Potential Modern Slavery Risks

Based on the controls outlined in this document, we assess the risk of modern slavery within our operations as low. Our initial evaluation found no instances of modern slavery within GCW's operations and supply chain. However, it did highlight several areas requiring improvements to more effectively mitigate the risks of modern slavery. These findings have informed the development of a Modern Slavery Action Plan. This plan will mandate that our commercial logistics partners submit self-assessments to better understand and address potential risks within their supply chains.

4. Actions taken to assess and address modern slavery risks

Management Responsibility and Commitment
GCW has developed a detailed Action Plan, that outlines the Group's ongoing strategy to mitigate risks associated with modern slavery. This comprehensive plan encompasses measurable outcomes and deadlines, ensuring a structured approach. To assess the effectiveness of our initiatives, the action plan will undergo regular reviews, allowing us to benchmark our progress and make necessary adjustments.



GCW Policy Framework

GCW Board of Directors
Responsible for the approval of key policies and the Modern Slavery Agreement

Compliance & Risk Committee
Responsible for overseeing the risk management framework and risk controls

Business Managers
Responsible and accountable for the implementation of the framework and policies

Sustainability Committee
Oversees the Group's framework and initiatives for environmental and social responsibility.

Modern Slavery Working Group
The working group, tasked with the daily management of modern slavery risks, comprises regional and general managers across various departments including removals, records management, human resources, IT, finance, marketing, and compliance.

GCW Policy Framework

GCW has a comprehensive suite of policies that embody our fundamental values, detailing our operational methodologies and setting clear expectations for both our employees and suppliers. These policies undergo regular reviews and updates to ensure their relevance and effectiveness. Key among these, with a focus on combating modern slavery, are:

Modern Slavery Policy
GCW is committed to eliminating the risk of modern slavery occurring within its own business and minimising the risk of modern slavery infiltrating its supply chains or through any other business relationship.

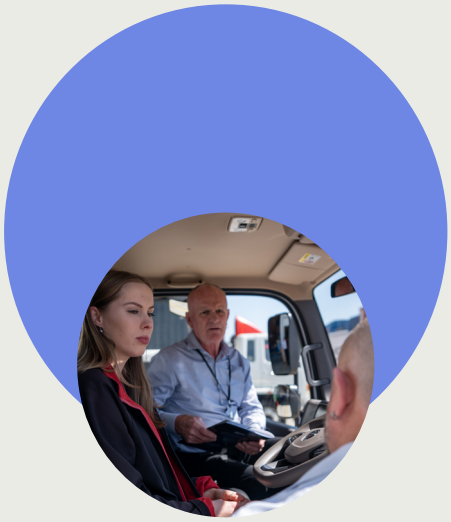
Anti-Bribery and Corruption Policy
This policy strictly forbids all forms of bribery and corruption and underscores GCW's commitment to conducting its business legitimately, ethically and in compliance with the applicable laws.

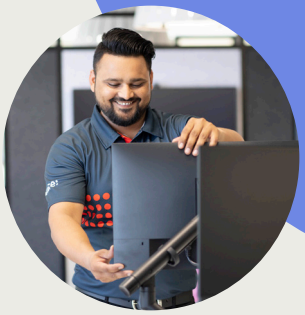
Code of Conduct
GCW has also adopted a strict Code of Conduct which outlines how the Company expects its employees and representatives to behave and conduct business in the workplace on a range of issues. It includes legal compliance and guidelines on appropriate ethical standards.

Whistleblower Policy
GCW is committed to conducting its operations within the framework of legality, ethics, and in accordance with its core values of Integrity, Unity, Excellence, and Commitment. Our goal is to cultivate a workplace culture that empowers employees or external parties to report any misconduct confidentially and anonymously, based on reasonable grounds, without fear of retaliation or negative repercussions. To support this, we have implemented an independent third-party Whistleblower Reporting Service.

Recruitment Policy
The policy ensures GCW's recruitment and selection procedures are equitable, unbiased, and free from discrimination. This encompasses the right to work in Australia and adherence to relevant laws and regulations.

Grievance & Dispute Resolution Policy
The Grievance and Dispute Resolution Policy offers a structured approach for addressing workplace grievances, including discrimination, harassment, or bullying, ensuring these issues are resolved swiftly and efficiently.





5. Assessing the Effectiveness of our Actions

GCW is continually assessing the effectiveness of initiatives outlined in this statement and broader activities across the business which impact human rights, and to further develop a framework for the ongoing assessment of our performance. Currently, we assess our effectiveness through the following mechanisms:

Governance & Policy Framework
We review key policies annually to evaluate whether they are fit for purpose.

Risk Management
We have implemented processes to monitor our modern slavery risk framework to ensure it is fit for purpose.

Audits and Monitoring
GCW operates an innovative online Compliance Management platform, designed to meet all business requirements for compliance adherence. This system features a self-monitoring component, overseen by our Compliance & Risk Team. The integrity of the platform is continuously reinforced through regular audits and inspections.

Training
Mandatory annual modern slavery identification and reporting training modules for business managers.

Supplier Risk Management
We have implemented a new supplier risk assessment and compliance system for all suppliers.

Planned Future Measures
GCW is dedicated to establishing a comprehensive strategy across the organisation to manage and reduce the risks of modern slavery within our operations and supply chain. To guarantee continuous enhancement in the effectiveness of GCW's efforts towards minimising the risks of modern slavery in its operations and supply chains, we have planned the following initiatives for the upcoming period:

- further examination and understanding of our commercial logistics customers and their supply chains and where appropriate risk assessments and seek assurances that they are complying with the requirements of the Modern Slavery Act;
- expanding the internal processes to further oversee and embed modern slavery processes in our business, drawing representatives from different business units of GCW to form a Modern Slavery Working Group.

6. Consultation process with owned or joint reporting entities

GCW is committed to a process of continuous improvement in relation to the protection of human rights and prevention of modern slavery.

The senior management team from across the entire GCW Group businesses contribute to the development of the Framework and Action Plan, including the drafting of this statement. The Sustainability Committee has reviewed this statement for its accuracy and comprehensiveness.

In 2025, actions will include:

1. Continue to develop systems to measure effectiveness of our actions.
2. Continue to work with partners in this area and identify opportunities for sector collaboration.
3. Further establish an assessment process for all supply chain providers.

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth) (the Act) for the year ending 31 December 2024.

This Statement was approved by the Board of GCW Holdings Pty Ltd on 1 April 2025.