



Australian Agricultural Company Modern Slavery Policy

<i>Version</i>	<i>Effective Date</i>	<i>Approved By</i>	<i>Review Date</i>
1.0	23/03/2023	Bruce Bennett General Counsel and Company Secretary Approved by the Board of AACo	23/03/2024

1. Purpose

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It encompasses slavery and slavery like practices, servitude, the worst forms of child labour, forced labour, debt bondage, human trafficking, forced marriage and deceptive recruiting for labour or services.

Australian Agricultural Company Limited (AACo) recognises that its business operations and extended supply chains, which are multi-faceted and geographically dispersed, pose a risk of involvement or connection to modern slavery. We acknowledge that we must continuously monitor and investigate these modern slavery risks. AACo is committed to playing its part to help end all forms of modern slavery.

This starts with AACo's commitment in seeking to identify, prevent and mitigate the occurrence of modern slavery risks in its own operations, as well as the operations of its suppliers.

2. Who does this policy apply to?

This policy applies to all directors, officers and employees of AACo and its controlled entities, including all volunteers, contractors, consultants and temporary or casual workers.

3. Policy Statement

AACo is committed to ensuring fair and ethical practices and does not condone exploitation, servitude, child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services in our supply chain and operations.

Our goal is to maintain and improve an ethical and sustainable supply chain by actively identifying and mitigating potential modern slavery risks. We work with our suppliers to ensure that common values of social responsibility and human rights are upheld throughout our supply chain.

4. Governance

AACo's commitments under this policy are underpinned by our:

- **Code of Conduct** which provides a framework to help maintain high standards of individual behaviour in alignment with AACo's values. Under the code everyone at AACo, including employees, contractors, board members, consultants, volunteers, and casual or temporary workers, is expected to uphold our values and conduct themselves in accordance with the highest ethical standards, including by respecting human rights and working to mitigate the risks of modern slavery practices in AACo's operations and supply chain.
- **Risk Management Policy** which recognises AACo's exposure to risk, including modern slavery risk, establishes that "risk management is everybody's business" at AACo, and champions effective risk management as a strategic strength of AACo. Modern slavery risks identified in AACo's operations or supply chain will be managed in accordance with this policy.
- **Whistleblower Policy** which details the mechanism through which a report of wrongdoing (including in respect of any modern slavery risk) can be made and describes the comprehensive protections and support available for those who do report, including assurance that any report would be kept confidential and investigated fairly.
- **Supplier Code of Conduct** which outlines our expectations in relation to procurement of goods and services, including prioritising suppliers who seek to have a positive environmental, social, and economic impact, including in respect of modern slavery.

- **Modern Slavery Working Group** which is headed by AACo's Company Secretary and General Counsel and is comprised of leaders from our Procurement, Finance, Legal, Risk, Shipping and Logistics, and Human Resources teams. The Working Group meets regularly to examine how to further embed best practice methodology in relation to identifying, preventing and mitigating the risks of modern slavery and uplifting modern slavery risk controls into AACo's operations and supply chain.
- **Modern Slavery Statement Reporting** that occurs on an annual basis in compliance the *Modern Slavery Act 2018* (Cth) (the **Act**) and which includes reporting on year-on-year initiatives, actions and controls to improve AACo's ability to identify, prevent, mitigate and report on modern slavery risks.

5. Implementation

To support our commitment in seeking to identify, prevent and mitigate the risk of modern slavery practices within our operations and supply chain, AACo:

- complies with all laws and regulations related to modern slavery practices in all countries in which we operate;
- reports on an annual basis on modern slavery risks in AACo's operations and supply chain as required under the Act;
- ensures that all suppliers of goods and services to AACo are aware of our commitment to mitigate modern slavery risks and comply with the minimum labour standards contained within AACo's Supplier Code of Conduct;
- prioritises efforts to identify and address risks of modern slavery in our operations and supply chains;
- requires employees to undertake training in respect of modern slavery risks;
- provides access to a mechanism through which anyone is able to confidentially and anonymously raise grievances or concerns while being protected from any form of reprisal and have in place a transparent process for investigating and reporting those grievances or concerns;
- undertakes periodic due diligence on our suppliers and product distributors to identify modern slavery risks in our operations and supply chains;
- periodically evaluates the effectiveness of our actions in identifying, preventing and mitigating modern slavery risks and make improvements as needed to ensure that our approach remains relevant and efficient in mitigating the threat of modern slavery in our operations and supply chain; and

Where modern slavery risks are identified in respect of a supplier, AACo will:

- make an effort to work collaboratively with them to identify, address and mitigate such modern slavery risks, including by educating them on ways to do so; or
- elect not to work with or, if they do not demonstrate a commitment to addressing modern slavery risks in their operation, to transition away from that supplier.

Behaviour that contravenes this Policy may lead to disciplinary action, including dismissal.

6. Review

This Policy will be reviewed on an annual basis.

Policy Information	
Version	Version 1
Approval Date	23/03/2023
Policy Changes	This policy may be rescinded, changed or replaced at any time at the absolute discretion of the General Counsel and Company Secretary or an authorised delegate.
Related References, Policies and Documents	<ul style="list-style-type: none">• AACo Code of Conduct• AACo Risk Management Policy• AACo Compliance Policy• AACo Whistleblower Policy• AACo Respecting Each Other Policy• AACo Recruitment & Selection Policy• AACo Anti-Fraud, Bribery and Corruption Policy• AACo Supplier Code of Conduct

Document Control	
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