



2024 Modern Slavery Act Statement
Australian Agricultural Company Limited
ACN 010 892 270

10 September 2024



2024 AACo Modern Slavery Act Statement

Introduction

This Modern Slavery Act Statement (**Statement**) has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**) for the period 1 April 2023 to 31 March 2024.

This Statement outlines AACo's practices to identify, manage, and address modern slavery risks in its operations and supply chain, and provides an update on AACo's intentions for the coming reporting period.

The numbered sections of this Statement correspond with each of the reporting criteria under the Act.

Criteria 1: Reporting entities

This Statement covers Australian Agricultural Company Limited (**AACo**) and each of its controlled entities. The reporting entities included in this statement are:

- **Australian Agricultural Company Limited** (ACN 010 892 270)
- **A.A. Company Pty Ltd** (ACN 010 317 067)

In addition, AACo owns, controls, and operates various subsidiary entities who are non-reporting entities under the Act, a full list of which can be found in the most recent AACo 2024 Annual Report available at aaco.com.au.

This statement has been prepared for AACo Group as a whole. Where this Statement refers to "AACo" it is a reference to the AACo Group.

Criteria 2: AACo's structure, operations, and supply chain

Structure

AACo is a public company listed on the Australian Stock Exchange with, as of 31 March 2024, 20 wholly owned and controlled subsidiary entities. The majority of the controlled entities are incorporated in Australia and operate solely within Australia. One controlled subsidiary incorporated in Australia has operations in Singapore, and four others are incorporated and operating in the United States of America. The primary functions of these foreign entities are to employ sales and marketing personnel and to perform treasury functions relating to the sale of products in their respective jurisdictions.

The reporting entities identified under Criteria 1 have the following functions:

- Australian Agricultural Company Limited is the listed parent entity and head of the AACo Group
- A.A. Company Pty Ltd is a trading entity

Team

AACo maintains a diverse and inclusive workplace, recognising that its global workforce contributes to its success. As at 31 March 2024, AACo and its subsidiary entities collectively employed a total of 468 employees. This workforce includes 377 permanent employees and 91 temporary employees, which includes casual workers and employees on temporary contracts. Most of AACo's employees are based across its locations in Australia, while a small number of work remotely from the United States, Singapore, South Korea, Netherlands, UAE and the European Union.



As of 31 March 2024, AACo had 11 workers employed under Australian visas. As an approved sponsor, AACo adheres to various obligations in respect of visa workers, such as providing equivalent terms and conditions of employment, providing a reasonable standard of accommodation, and avoiding discriminatory recruitment practices. To assist with fulfilling these obligations, AACo partners with a trusted external adviser who specialises in immigration. This advisor is a Registered Migration Agent (**RMA**) operating under the Australian Government's Code of Conduct for RMAs. AACo's support of visa employees is a component of its broader strategy to attract and retain top talent from around the world.

AACo Operations

AACo is a fully integrated branded beef business with three principal activities:

- Sales and marketing of high-quality branded beef into global markets;
- Production of beef including breeding, backgrounding and feedlotting; and
- Ownership, operation and development of pastoral properties.

As at 31 March 2024, AACo manages operations across a vast expanse of 6.5 million hectares, overseeing approximately 455,000 head of cattle across 19 owned cattle stations, 4 leased stations, 2 owned feedlots, 2 owned farms and 1 leased farm, located throughout Queensland and the Northern Territory.

Beyond its Australian operations, AACo has established sales and marketing activities in Singapore, South Korea, Europe, the United Arab Emirates (UAE) and the United States of America. During the reporting period, AACo expanded its team in the UAE with new sales and marketing employees. AACo activities in these regions are focused on the sale and marketing of products within these key international markets.

AACo's Supply Chain

AACo boasts an extensive supply chain. Typically, AACo cattle are raised on grass for approximately 15 months before being finished on grain for around 300 days, after which they undergo processing and distribution.

During the reporting period, AACo engaged a network of 1,950 direct suppliers, the overwhelming majority of whom are based in Australia. These suppliers, ranging from small family-owned businesses to large multinational corporations provide goods and services essential to AACo operations, including equipment, machinery, vehicles, fencing, trucking, and contract mustering and farming services. AACo also have established partnerships with Australian suppliers of grain and feed, meat processing services, cold storage companies, logistics and shipping companies and freight forwarders.

While the majority of its procurement activities are concentrated in Australia, AACo also sourced goods and services from 17 other countries during the reporting period, including from the United States of America, United Kingdom, United Arab Emirates, Sri Lanka, Singapore, South Korea, Hong Kong, France, and Canada. These international suppliers deliver a range of goods and services including administration, sales, marketing, and distribution functions for branded beef to global markets, as well as various back-office functions.

In the final stages of AACo's supply chain are its distribution partners, whom play an important role in delivering AACo products to end consumers. During the reporting period, AACo, through these distributors, sold its high-quality branded beef to restaurant customers both domestically and internationally, with key markets including South Korea, the United States, Europe and Canada.



Criteria 3: Risks of modern slavery practices in AACo operations and supply chain

The 2023 edition of the Global Slavery Index (**GSI**) reports that Australia has a relatively low prevalence of modern slavery. However, globally, the agriculture sector is recognized as high-risk due to its reliance on low-skilled and seasonal labour. In this context, AACo recognizes the risk that it could cause, contribute to or be otherwise directly linked to modern slavery practices. Set out below is an explanation of how these risks relate to AACo's operations and supply chain, and how it seeks to mitigate them.

Risk in AACo operations

AACo is aware of potential modern slavery risk factors within its operations. These risks are influenced by several factors inherent to its industry and operating model:

1. Remote Locations: AACo regional properties are often located in isolated areas, which can make oversight challenging and increase vulnerability of employees to exploitation.
2. Seasonal Workforce Demand: The nature of AACo's business sometimes requires seasonal employment, leading to fluctuations in workforce demand and the increased use of temporary and casual labour, which can be more susceptible to modern slavery practices.
3. Migrant Workers: The employment of workers under Australian visa arrangements, who may depend on their employer for both legal status and livelihood, poses a higher risk for exploitation and modern slavery.

While acknowledging these factors present potential risks, the risk of AACo causing, contributing to or being directly linked to modern slavery in its operations is assessed as low, based on the employment practices and legal frameworks in place, as well as ongoing efforts to continually improve the AACo employee experience.

The overwhelming majority of AACo's workforce is based in Australia with minimal reliance on employees working on Australian visas, as outlined under Criteria 2.

AACo enter individual employment contracts with employees in Australia and internationally that establish clear employment terms and conditions in compliance with relevant labour laws and regulations in each jurisdiction. AACo's employment terms and conditions are underpinned by the Fair Work Act and the National Employment Standards.

At AACo, employees are valued and their wellbeing is prioritised as part of AACo's commitment to ethical employment practices. AACo have management practices in place to monitor and uphold its commitment to fair employment conditions, employee well-being, and diversity and inclusion.

Risk in AACo's supply chain

AACo's supply chain also carries potential risks related to modern slavery. These risks are primarily associated with specific product and service categories, as well as the geographical locations of some of AACo's suppliers:

1. High-Risk Product Categories: Certain categories, such as electronics, solar panels, and garments, are recognised by the GSI and other sources as having higher risks for modern slavery due to the nature of their production processes and labour practices.



2. Supplier Geographical Locations: Engaging suppliers from regions with higher incidences of modern slavery can expose AACo to risks of being directly or indirectly linked to unethical labour practices through these third party suppliers' activities.

The following are specific measures AACo implements to mitigate these risks and uphold ethical practices:

- Due diligence is undertaken on new suppliers and distributors prior to being onboarded with AACo. Counterparties are required to respond to AACo's onboarding questionnaire, which includes questions that can highlight modern slavery risk and requires them to complete a modern slavery attestation. Contractors undertake an onboarding program which supports understanding and following of AACo policies and procedures, including in relation to management of modern slavery risks in AACo's supply chain and operations.
- AACo's procurement model for raw materials such as grain, fuel and other inputs is based on long-term relationships with predominantly Australian suppliers who have passed through AACo's due diligence process. For instance, supplements used in AACo's proprietary lick block formula are sourced from Australian suppliers, with the exception of molasses which is sourced from a long-term supplier located in Vietnam.

Criteria 4: Actions taken to assess and address modern slavery risks

AACo's approach to assessing and addressing modern slavery risk is guided by its Modern Slavery Working Group, chaired by the Company Secretary and General Counsel. Members of the Group include leaders from the Finance, Legal, Risk, Shipping and logistics, and People and Culture teams. The Working Group meets at least annually to explore strategies for further embedding better practice into AACo's operations and enhancing AACo's modern slavery risk controls.

Actions taken to assess modern slavery risks

AACo implements a number of activities to facilitate the assessment of modern slavery risk in its operations and supply chain:

Employee Training and Awareness

AACo focuses on training and raising awareness about modern slavery issues to foster conditions within AACo where employees can identify and report potential risks, allowing AACo to effectively assess the extent of these risks within AACo's organisation and supply chain.

AACo's employees complete an online training module designed to improve their understanding of how to identify and report suspected instances of modern slavery. This comprehensive module concludes with an assessment to measure respondents' knowledge and understanding of the concepts presented. All Executives and Senior Leaders have completed this training, underscoring their commitment and acknowledgement of the importance of this training. The training has a 94% completion rate among the broader business.

In the reporting period, AACo rolled out sexual harassment training for its leaders. An online module on harassment was assigned to all people managers across the business. In addition, an externally facilitated workshop was held for all Executive and Senior Leaders in the business. The training included an overview of the drivers of sexual harassment, its prevalence and why it is under-reporting as well as how to respond when allegations of inappropriate workplace behaviors are brought to their attention.



Grievance platform

AACo’s *Speak Up* initiative empowers employees to report any work-related grievances, encompassing a wide range of issues including health and safety concerns, allegations of discrimination, harassment, sexual harassment and bullying. 'Speak Up' provides a dedicated online platform and hotline for anonymous reporting, eliminating perceived or actual barriers that might deter employees from feeling safe when raising concerns. The platform also serves as a repository for data and analytics, enabling real-time insights to support ongoing monitoring and review of modern slavery risks. Speak Up is featured on AACo’s company wide website, advertised internally in both paper and electronic format and reference to Speak Up is included in employee training.

Whistleblower platform

AACo’s internal *Speak Up* initiative is complemented by a secure whistleblower platform supported by ‘Your Call’. The Your Call platform provides employees and other stakeholders with a secure and anonymous means of raising concerns without fear of repercussions, while also enabling management to conduct investigations while safeguarding the whistleblower’s anonymity. Employees are made aware of the platform and its hotline during their onboarding process and through staff training. Your Call is also featured on AACo’s internal, company wide website and advertised internally in both electronic and paper-based format.

Modern slavery risk assessment for suppliers

AACo undertakes an annual third-party supported modern slavery risk assessment across all its direct suppliers. During the reporting period, AACo had 1,950 direct suppliers which were subject to this assessment. Based on the results of this assessment, no AACo suppliers were identified as high-risk, and the substantial majority were assessed as having a low or very low risk of modern slavery within their operations.

Actions taken to address Modern Slavery Risks

Internal Policies

While AACo’s rigorous employment practices are an effective preventative measure for modern slavery risk, residual risk is mitigated by a suite of internal policies, which are designed to safeguard employees and actively encourage them to raise any concerns they may have. AACo regularly reviews its policies, procedures, and working documents to appropriately address standards of professional conduct and responsible business fundamentals, including human rights and ethics.

Policy	Purpose
Modern Slavery Policy	AACo’s Modern Slavery Policy affirms AACo’s commitment to contribute to ending all forms of modern slavery. The Policy provides a structure for the Company’s approach to reducing the risk of modern slavery practices within its operations and supply chains.



Policy	Purpose
Code of Conduct	AACo’s Code of Conduct 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 the AACo 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	AACo’s Risk Management Policy recognises AACo’s exposure to risks, 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	The AACo Whistleblower Policy 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.
Respecting Each Other Policy	AACo’s Respecting Each Other Policy is a workplace behaviour policy that clearly outlines AACo’s zero-tolerance approach to any form of bullying, harassment, sexual harassment, discrimination, or vilification. The policy provides clear definitions and examples of each of these behaviours and offers information on grievance escalation processes.
Recruitment & Selection Policy	AACo’s Recruitment and Selection Policy supports the appointment of the most qualified individuals to each role. The Policy aligns with Equal Opportunity Legislation and strives to eliminate any unfair discrimination and bias in AACo’s recruitment and selection process.

AACo’s FY23 Modern Slavery Act Statement noted the development of a Supplier Code of Conduct. Although the implementation of the Supplier Code of Conduct has been deferred to allow for a review of company-wide procurement processes, AACo remains focused on uplifting its procurement practices and will continue to enhance its approach in the coming reporting period.

Supplier onboarding

New suppliers go through AACo’s supplier onboarding and due diligence process. This process includes a modern slavery declaration confirming that they are not engaging in modern slavery practices, that they are meeting their reporting requirements, and that they have implemented policies and processes to mitigate modern slavery risk. Additionally, they must inform AACo of any modern slavery incident and provide any necessary information to verify compliance with AACo’s standards.

Where initial due diligence identifies risk factors (such as a major supplier in an industry flagged as higher risk) then AACo will engage in direct discussion with that supplier to understand initiatives and actions taken to prevent modern slavery risks.



Supplier engagement

Based on the results of the annual third-party modern slavery risk assessment, where suppliers are identified as being potentially high-risk, AACo engage with them directly to understand their stance and approach to managing modern slavery risk. No suppliers were flagged as high risk in the current year risk assessment.

Reporting

During the reporting period, AACo did not identify any instances of modern slavery in its supply chain or operations. Consequently, no remediation actions were required or took place.

AACo recognises that transparent reporting is fundamental in addressing modern slavery risks within its operations and supply chain. AACo's actions in this regard include:

1. Annual Modern Slavery Act Statements: AACo annually publishes a Modern Slavery Act Statement that details AACo's commitment to combat modern slavery, the steps taken to assess and mitigate risks, and the progress made during the reporting period. These statements align with statutory obligations and provide stakeholders with a clear understanding of its efforts.
2. Board and committee oversight: the Board Audit and Risk Management Committee plays a crucial role in overseeing the reporting on modern slavery risks. It monitors the information presented in AACo's Modern Slavery Act Statements is consistent with AACo's actions and reflects the integrity of its efforts.

Actions planned for FY25

In the next reporting period, AACo intends to build upon progress made in previous reporting periods through the following actions:

Action	Description
Live modern slavery assessments at supplier and distributor onboarding	AACo conducts an annual third-party enabled modern slavery assessment across its direct suppliers and distributors. AACo will review third-party capabilities to provide live modern slavery assessments as part of the AACo supplier onboarding process.
Supplier questionnaires	AACo will review third-party capabilities to support the implementation of supplier modern slavery questionnaires. These questionnaires can be utilised for rescreening of existing suppliers in higher risk sectors, or to obtain information from suppliers who flag as medium risk or above in the annual risk assessment.
Review of AACo Code of Conduct	In the next reporting period, AACo will initiate a review of its Code of Conduct. This review aims to consider whether the Code remains aligned with best practices and continues to effectively support AACo's commitment to ethical employment standards and the prevention of modern slavery. By updating and refining the Code, AACo aims to reinforce its values and provide clearer guidance to all employees and stakeholders.



Criteria 5: Assessing the effectiveness of AACo’s actions

AACo strives to ensure that its actions in identifying and managing modern slavery risks are both impactful and subject to continuous improvement. AACo assesses the effectiveness of its actions by:

1. Tracking AACo’s actions and outcomes to consider whether actions are not only implemented but also addressing the targeted risks.
2. AACo compares its actions with those being deployed by AACo’s peers and others in the market and periodically seeks external advice in order to refine AACo’ strategies and stay aligned with best practices.

Progress Update on FY24 Initiatives

In its FY23 Modern Slavery Act Statement, AACo outlined its initiatives for the FY24 reporting period. AACo is pleased to provide an update on its progress against these initiatives:

Action	Progress
Consolidating the AACo Modern Slavery Policy	A modern slavery supplier declaration has been embedded in AACo’s onboarding processes and continued the rollout of the ‘Speak Up’ grievance platform.
Review of Attorney General’s recommendations	<p>AACo has reviewed the recommendations made by the Attorney General’s Report of the statutory review of the Act. AACo notes recommendations in two areas which, if implemented, may require changes to current processes and reporting practices.</p> <p>Introduction of due diligence obligations</p> <p>As noted in this report, AACo undertakes due diligence on suppliers and distributors as part of its onboarding process. AACo will monitor for further developments of this recommendation to ensure its current procedures align with obligations which may emerge; or make changes as may be required to align with new obligations.</p> <p>Expansion of mandatory reporting criteria</p> <p>The insertion of additional reporting criteria may require modification to data collection and reporting systems to allow AACo to meet those criteria. AACo will monitor for further developments in this recommendation.</p> <p>AACo also notes the recommendation to introduce offence and penalty provisions, which will be relevant to all reporting entities under the Act. AACo continues to monitor publicly available information and intends to remain proactive in response to changing regulations and emerging practices in addressing modern slavery.</p>



Criteria 6: Consultation process

This Modern Slavery Act Statement has been made on behalf of AACo and its 20 controlled entities, including A.A. Company Pty Ltd which is also a reporting entity. A small number of the controlled entities have operations in the United States of America and Singapore. Modern slavery risks and impacts have not been assessed in those jurisdictions where AACo has a sales and marketing presence only, including Singapore and the USA.

AACo's controlled entities are wholly owned and controlled by AACo. Accordingly, AACo did not consider that formal consultation with its controlled entities was necessary or useful in preparing this Modern Slavery Act Statement. AACo and its controlled entities are treated as one operational entity from a corporate governance perspective and each of the controlled entities is covered by AACo's policies, procedures, and systems, including those relating to human resources, contracts and contractor management, and procurement.

Criteria 7: Provide any other relevant information

Relevant additional information has been included within each of the criteria above.

Criteria 8: Approval

This Modern Slavery Act Statement was approved by the Board of AACo on behalf of AACo and the second reporting entity covered by this statement, A. A. Company Pty Ltd, on **10 September 2024**.

David Harris

Managing Director & Chief Executive Officer

Registered Office

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