

MODERN SLAVERY STATEMENT 2022



Introduction

A note from our CEO



*A proudly Australian company, Lindsay Australia Limited (**LAL** or **Lindsay Australia**) is a leading integrated transport, logistics and rural supply company. From paddock to plate, our strong partnerships with suppliers make us the leading name in regional communities and across metropolitan areas. This reputation is built on trust, experienced through our team consistently acting responsibly, transparently, and with integrity in our business interactions.*

*At Lindsay Australia, our business and people's success depend on being a reputable organisation. We believe that actions speak louder than words; our values underpin how we manage our business and what is important to us. Being diligent in our actions to improve the safety and well-being of our people is central to **The Lindsay Way**.*

This necessitates safeguarding, valuing, and promoting the human rights of all our workers, in our facilities, in our trucks and in our full supply chain.

LAL maintains our zero-tolerance approach to modern slavery and human trafficking and continues to be committed to acting ethically and transparently in all our business dealings and relationships. In expecting the same standards from our contractors, suppliers, and other business partners, we will work together in partnership to manage risk and ultimately create better social and environmental outcomes.

On behalf of Lindsay Australia, I am pleased to share our second Modern Slavery Statement. Our second reporting period has been marked by increasing awareness of this complex issue across the group, and we are proud to take this opportunity to reaffirm our commitment to growing our understanding of this complex issue and playing our part in eradicating modern slavery. This statement outlines our progress in deepening our supplier engagement and provides our three-year roadmap to mitigate the risks of modern slavery in our business processes.

KIM LINDSAY
CEO/Managing Director

Lindsay Australia Limited acknowledges the First Nations peoples of the lands upon which we live and work. We acknowledge their rich cultures and their continuing connection to land, waters, and community. We pay our respects to their Elders past, present and emerging.

About this Statement

Lindsay Australia Limited ACN 061 642 733 (LAL) has produced this Modern Slavery Statement in accordance with Section 16 of the *Modern Slavery Act 2018* (Cth), (hereafter referred to as “the Act”) for the financial year ended 30 June 2022.

All references to our, we, us, the Company, the Group, Lindsay and LAL collectively refer to Lindsay Australia Limited ACN 061 642 733, its reporting entities and subsidiaries, including Lindsay Transport Pty Ltd ACN 055 792 919, Lindsay Rural Pty Ltd ACN 090 821 300 and Lindsay Fresh Logistics Pty Ltd ACN 600 103 142. All references to a year are this financial year ended 30 June 2022 unless otherwise stated. All monetary values are listed in Australian dollars (A\$) unless otherwise stated.

Lindsay Australia Limited’s head office is located at 152 Postle Street, Acacia Ridge, QLD 4110.

Consultation

The drafting of this statement was led by a cross-functional team drawing on expertise across our business, including Corporate Governance, Strategy, Procurement, Fleet Management and Human Resources in consultation with each of the above reporting entities.

The Lindsay Way

The “Lindsay Way” motto sets a standard through which we hold ourselves accountable to customers, shareholders, partners and employees by honouring commitments and striving for excellence. The Group’s core values are both individually significant and in combination lay the platform for the everyday operations and build a sustainable business for the future. Our values underpin how we manage our business including our approach to addressing Modern Slavery.



Safety First:

Making safety a personal value; think SAFE, act SAFE, be SAFE

Community Supportive: Involved and supportive of the local communities



People Focussed:

Development and support of current and future employees

Customer & Supplier Oriented:

Maintain and improve high level of service to customers and suppliers



Value Family:

Recognising the importance and value of family life

Industry Innovators:

Constantly challenging ourselves to provide and develop new innovations



Structures, Operations and Supply Chain

About Lindsay Australia

Established in 1953 by brothers Tom and Peter Lindsay, Lindsay transport has grown to be a leading name in transport and logistics in Australia. In the early days the business carried fruit and vegetables to the trains in Coffs Harbour for transportation to the Sydney markets using three second-hand trucks contracted from their father, Victor Lindsay.

The Lindsay Brothers enjoyed considerable growth in their business and by the 1970s had become a dominant player in the Australian refrigerated transport industry that they had helped pioneer. The early desire and drive for industry best practice and to support the unique needs of Australian businesses has driven LAL to evolve into a fully integrated transport, logistics, and rural supply company, servicing customers in the food-processing, food services, rural and horticultural sectors.

A publicly listed company on the Australian Securities Exchange (ASX: LAU) Lindsay Australia has grown to be comprised of a corporate group including Lindsay Transport, Lindsay Rural and Lindsay Fresh Logistics.

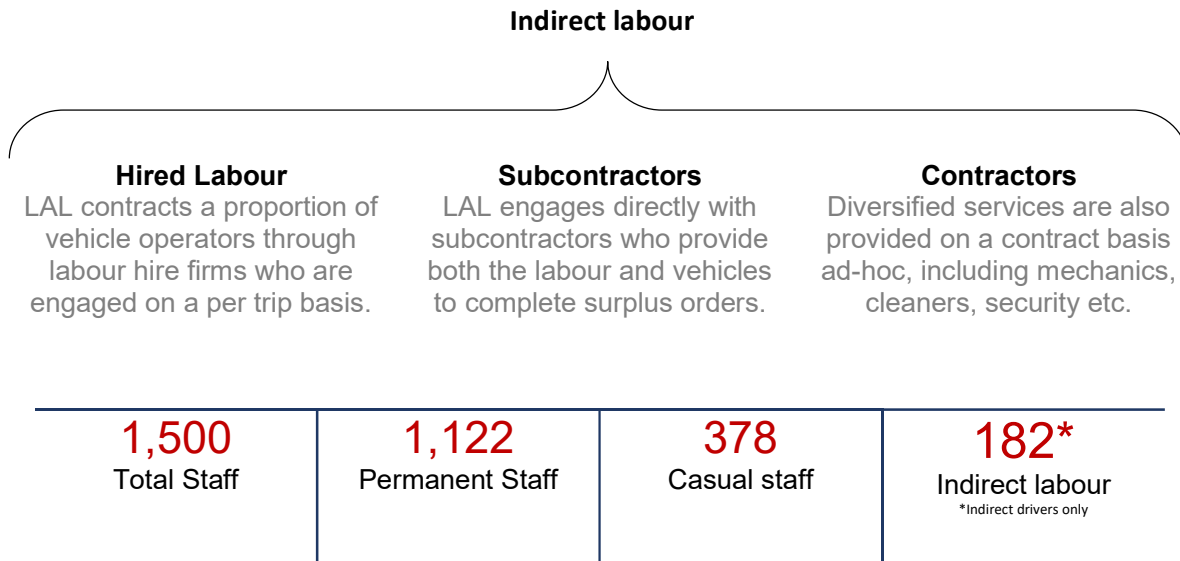


Figure 1 - Lindsay Australia Limited Operations

Employees

Collectively the business employs around **1,500 employees** across **31 sites**, with over 1,122 permanent staff and 378 casual employees.

LAL also relies on engagement of indirect workers who support our business with ongoing labour and services. For clarity within this statement, these relationships have been broadly grouped into three categories.



Operations

Lindsay Transport coordinates a considerable daily logistics task allocating over 1500 company owned assets to deliver more than 2 million tonnes of freight to over 3,000 customers along Australia's east coast each year. Lindsay Transport provides end-to-end transportation services, including linehaul, dry and general freight, refrigerated chiller freight, as well as local pick-ups and deliveries.

Lindsay Rural has 20 branches situated across Australia and supplies more than 1,500 farmers with an extensive range of agricultural products, incorporating packaging, fertilisers, chemicals, and irrigation equipment. The company's operations in Queensland's horticultural sector are serviced by 13 locations extending from Stanthorpe to Mareeba, with other notable locations including Mildura (Vic), Invergordon (Vic), Coffs Harbour (NSW), Murwillumbah (NSW), and Berri (SA).

Lindsay Fresh Logistics, a transport and logistics provider located in the Brisbane Markets, provides unloading, cross-docking, storage, ripening, fumigation, and import/export services.



Figure 2 - LAL Operating Division

Governance

To address the risks of modern slavery across our operations and supply chain, we have set up a strong governance structure.

Stakeholders	Government and Regulators	Business Partners and Investors	Shareholders	Employees	Community
Board	Lindsay Australia Limited Board of Directors Maintain oversight of human rights (including modern slavery) across our operations and business processes.				
Management Responsibility	Audit and Risk Committee Responsible for oversight of LAL's response to human rights and provides guidance to the Board.		Executive Leadership Team Accountable for the implementation of our human rights approaches across the group.		
Business Processes	Modern Slavery Working Group Accountable for supporting modern slavery risk-management across our operations.	Human Resources Accountable for ensuring employees are subject to relevant awards or industrial instruments.		Sustainability Working Group Promotes information exchange across the group on the implementation of sustainability-linked goals, including modern slavery.	
	Line Management Team Accountable for the identification and response to modern slavery risks within their departments.	Procurement Team Accountable for the identification and response to modern slavery risks within our supply chains.		Human Resources Team Accountable for the identification and response to modern slavery risks within our staff base.	
	Operational Staff Responsible for the identification of modern slavery risks within our operations and supply chains, consistent with our company values.				

Figure 3 - Lindsay Australia Limited Modern Slavery Governance Structure NB: the MSWG has informally been operating in FY22, including in drafting this statement; it is an agreed action to formalise this within the organisation in FY23.

Supply chain

LAL works with a variety of suppliers who provide the business with materials, equipment, vehicles, and inventory necessary for us to carry out our business. In FY21, LAL spent \$468 million with 2,486 suppliers. While 99% of our suppliers are based in Australia, we recognise that we are directly linked to modern slavery risks through the many tiers of suppliers in the chain between LAL and companies that mine, grow, extract and process the raw materials that go into the goods we purchase.

Of the overseas **direct suppliers**, we sourced from the following locations: Belgium, China, Israel, Norway, New Zealand, Singapore, and the United States

We have identified the country of origin for a portion of our **indirect suppliers**, including:

China, India, Israel, Belgium, Japan, Thailand, Norway, Taiwan, New Zealand, Spain, United States, Vietnam, Indonesia, the Philippines and various countries from the Middle East.

2,480+
Direct (Tier1) Suppliers

\$486m
Total spend

99%
Australian-based suppliers

102
Categories across goods and services

Our entities are responsible for procuring different products and services aligned with their business profile which is outlined in the table below.

Business Unit	Key Supply Chains
<p>Lindsay Transport (Transport, logistics, warehousing, cold chain)</p>	<ul style="list-style-type: none"> • Fresh food, horticulture/agricultural food stuffs • Fleet and equipment • Road transport subcontracting • Tyres • Fuel and lubricants • Labour Hire • Equipment maintenance, spare parts and servicing • Decals/logos
<p>Lindsay Rural (Rural supplies)</p>	<ul style="list-style-type: none"> • Fertiliser • Chemicals • Cartons • Nutrient
<p>Lindsay Fresh Logistics (Import and export related services)</p>	<ul style="list-style-type: none"> • Fresh food, horticulture/agricultural food stuffs • Road transport subcontracting • Fumigation and ripening input products
<p>Head Office/operations (IT services, Property development initiatives, Property maintenance)</p>	<ul style="list-style-type: none"> • Property development for warehouse services, Cold rooms and transport operations • IT software and hardware • General office supplies • Telecommunications and security equipment supplies • Uniforms and personal protective equipment supplies • Professional services such as legal and accounting • Cleaning services

Identifying Modern Slavery Risks

Taking a risks-based approach

The International Labour Organization and Walk Free Foundation estimate that 50 million people are subject to modern slavery, with 16 million of them working under forced labour conditions in the private economy. This is not just a problem in complex global supply chains, according to the Walk Free Foundation's Global Slavery Index, 15,000 Australians are believed to be victims of modern slavery.

The Australian Government defines modern slavery as encompassing eight types of serious exploitation, including:

1. Trafficking in persons
2. Slavery
3. Servitude
4. Forced marriage
5. Forced labour
6. Debt bondage
7. The worst forms of child labour
8. Deceptive recruiting for labour or services

The United Nations' 'Guiding Principles on Business and Human Rights' (**UNGPs**) set out a three-part continuum of involvement that outlines how businesses can be involved in adverse human rights impacts, including modern slavery:

> **CAUSE:** a business may **cause** modern slavery (or other human rights harm) where its actions or operations directly result in modern slavery practices.

A transport company could cause modern slavery in limited circumstances through threats associated with visas. We have targeted internal human resources procedures and controls to ensure all LAL employees are subject to relevant awards or industrial instruments and subject to the National Employment Standards under the *Fair Work Act 2009* (Cth). Wages and benefits meet or exceed all legal requirements.

> **CONTRIBUTE:** a business may **contribute** where its actions or omissions facilitate or incentivise modern slavery

Through our diversified support services, for example, a cleaning company, we recognise the potential we could contribute to modern slavery if we placed unrealistic cost requirements or timeframes on its subcontractors, which could likely only be met using exploited labour. Our businesses regularly engage with our suppliers and maintain strong relationships. These relationships are pivotal to ensuring a continuous dialogue where impractical expectations can be properly understood and addressed.

> **DIRECTLY LINKED:** a business may be **directly linked** to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in businesses' extended supply chain.



Like most Australian businesses, we understand that our extensive supplier network is the source of most of our modern slavery risks. For example, a tyre supplier may purchase rubber through a trader sourcing raw materials from cooperatives, some of whose members utilise forced labour on their plantations.

We consider four key areas for their probability to increase the risk of modern slavery: (1) vulnerable communities; (2) high-risk business models; (3) high-risk procurement categories; and (4) high-risk geographies. There is a higher possibility that actual harm is occurring when several high-risk elements are present, so additional controls are needed to make sure that risk does not materialise into harm.

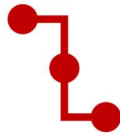
As described below, we will use this understanding to analyse our spend in the next financial year (FY23) and identify our high-risk spend categories. This assessment will allow us to use partnerships and our collaborative relationships with our suppliers to work together to mitigate these risks in accordance with best practice and the UNGPs.

Risk Areas

We have identified four key risk areas that intersect with our operation or supply chain.

Risk areas	Description of risk	Relevance to LAL
<p data-bbox="289 1035 488 1108">Vulnerable communities</p> 	<p data-bbox="540 1035 976 1224">Services such as cleaning and security are labour-intensive; reliant on a base-skill workforce in which temporary and irregular work is prevalent, leading to a higher risk of exploitative practices.</p> <p data-bbox="540 1255 976 1381">The prevalence of migrant workers within this sector also increases the risk of practices such as debt bondage and visa exploitation.</p>	<p data-bbox="1000 1035 1417 1098">Indirect labour providing lower-skilled services:</p> <p data-bbox="1000 1129 1463 1287">LAL’s reliance on indirect labour recruited through labour hire agencies decreases our visibility over the payment, and contract terms passed down by the labour provider.</p> <p data-bbox="1000 1318 1458 1444">This lack of oversight also extends to LAL’s use of contracted labour for diversified service support, including security and cleaning.</p>
<p data-bbox="289 1482 488 1556">High-risk geographies</p> 	<p data-bbox="540 1482 976 1854">Offshore service providers based in high-risk locations carry increased modern slavery risks (due to poverty, displacement, the weak rule of law, and/or state failure to protect human rights). These business relationships also increase the likelihood of being directly linked to forced labour through the providers’ supply chains - such as cleaners, and security.</p>	<p data-bbox="1000 1482 1344 1545">High-risk offshore service provider:</p> <p data-bbox="1000 1577 1458 1759">LAL works with one offshore service provider and takes measures to mitigate risks associated with this relationship. However, we are cognisant of the risks associated with the provider’s supply chain.</p>

High-risk procurement categories



Gaining sufficient visibility of the risks to the people working within modern complex multinational supply chains is challenging. Many of the materials required to run a business have a high risk of complicity to modern slavery – rubber, petrochemicals, textiles – these risks do not exist just with our direct supplier, but often several supply tiers deep or even in primary production.

High-risk products with sub-tier 1 risks

LAL purchases various products with a high risk of modern slavery in the early stages of its supply chain:

- Personal Protective equipment (PPE) and Uniforms (weak protection of workers’ rights; poor labour practices including excessive overtime, state-sponsored forced labour);
- Batteries (sourcing of cobalt presents the greatest risk to human rights abuses. Political instability or conflict, particularly in the Democratic Republic of Congo); and
- Steel components (country of production where labour rights might not be well protected; low-skilled labour, and dirty, dangerous, or difficult work in mines and smelting plants leading to poor labour conditions).

LAL is undertaking an analysis of our purchasing to prioritise inherent risks in our supply chain and to augment our due diligence processes accordingly.

High-risk business models



Agricultural and horticultural industries have seasonal workforce requirements to cope with on-site demands for low skill activities. To ensure profitability these labour costs need to be tightly controlled. Australia’s demographics has created a reliance on the engagement of labour hire contractors who recruit backpackers and seasonal workers for fruit and vegetable picking on farms and in packing houses. These temporary workforce requirements, often in isolated areas, increases the risk of exploitative activities.

Transportation of risk products

As a transport services provider the proceeds of modern slavery may be present within the goods we transport. At either the origin or destination of shipments being transferred, our drivers may have the opportunity to identify risk factors for modern slavery.

Consistent with our values, in FY23 we will explore how to educate our customers and staff on the risk indicators for human trafficking and modern slavery.

Emerging and evolving risks

COVID-19

The unprecedented coronavirus epidemic and health crisis occurred during the reporting period. LAL had to adopt several strategies to manage the COVID-19 pandemic in accordance with the requirements of each State or Territory in Australia, which enforced various health and safety guidelines and regulations to control the spread of COVID-19. We were quick to convene a crisis management team who met on a regular basis to adapt our responses to the pandemic, including revised work instructions to ensure the safe continuous operations of our essential transport services. Under this team's guidance, we were quick to adopt rapid antigen testing across our operations to ensure early identification of potential vectors within our staff, protecting further transmissions between staff and the wider community. We adopted safe handling and workflow procedures to ensure social distancing was maintained wherever practicable. And, acknowledging the pandemic's impact on our customers and the risk that cash flow challenges may impact their ability to pay their vulnerable staff, LAL adopted extended payment terms as required to support customers suffering from cash flow-related pressures.

Addressing Modern Slavery risks

Organisational Strategy

Respect for all people is a core organisational value that underpins our daily interactions with employees, suppliers, and customers. Addressing areas of the business where risk to people is highest, is a natural extension of our organisation's intent to lead the industry in ethical business conduct. We have developed a strategy to increase protections for people throughout our business and ensure that our operations do not contribute to human rights risks.

Our strategy evolved through a series of internal stakeholder interviews facilitated by an external expert agency. Risks were identified and opportunities considered in relation to the organisation's sphere of influence. This allowed us to develop a risk-based approach, concentrating efforts where our influence to create positive change is most significant.

From this process, six core pillars were defined and form the basis of LAL's approach to embedding modern slavery mitigation throughout our organisation and value chain.

An action plan has been developed so that each pillar can be monitored, measured and reported against in subsequent statements, allowing us to track our progress and drive continuous improvement.





Governance

Our governance structure and policies provide the foundation for our response to modern slavery risks. They ensure responsibility for managing modern slavery risks is clearly allocated across business units and enable us to take a consistent and strategic approach.

Steps Taken	
<input checked="" type="checkbox"/>	Defined roles and responsibilities for escalation of suspected or reported issues
<input checked="" type="checkbox"/>	Cross-functional accountability and involvement
<input checked="" type="checkbox"/>	Policy commitment to embed responsible business conduct
<input checked="" type="checkbox"/>	Systems in place to monitor internal compliance

Cross-functional accountability

LAL will have a standardised approach aligned to organisational values but flexible to the varied risk profiles. By centralising the organisational response to modern slavery within a cross-functional team, we will ensure that issue owners are well-informed and educated, allowing them to engage directly with business units to operationalise mitigating actions.

The core members directing the LAL approach include:

- Safety, People, Culture and Communications Manager
- Fleet Quality and Efficiency Manager
- Head of Strategy & FP&A
- General Manager - Lindsay Rural
- General Manager - Lindsay Transport

This team engages directly with relevant business units (including operational site management, compliance team, payroll, procurement, and commercial team) to assist in training employees and implementing required changes.

Policy commitment:

LAL has a strong suite of internal policies and processes that embed a responsible practical process for each business unit. In particular, LAL maintains a Code of Conduct (Code), which sets out certain standards of conduct to aid its directors, officers, employees, and contractors in making the proper ethical and legal decisions when conducting business for us and performing their day-to-day duties.

Our Code is provided to all employees upon commencement of employment and accompanies the employment contract.

All employees are required to acknowledge that they understand and will comply with the Code and are reminded about the requirements under the Code annually during a review. The Code outlines expectations regarding Human Rights and LAL's commitment to upholding conditions that respect individuals' rights and dignity. Through the Code and our other policies, we seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations in every aspect of our business.

Other relevant policies include:

- Code of Conduct
- Whistleblower policy
- Grievance Policy
- Recruitment Policy
- Risk Management Policy & Framework
- Workplace Health & Safety Policy
- Chain of Responsibility
- Anti-Corruption Policy
- Anti-Bribery Policy

Monitoring internal compliance:

LAL complies with its obligations under Australian laws, including employment and work health and safety laws and promotes adherence to these laws

Suppliers and Contractors:

LAL undertakes periodic reviews of suppliers and contractors to obtain various assurances from suppliers and contractors, including their employment practices.

Next steps:

We will continue to improve our governance structures and policies by formalising lines of accountability and reviewing our policies and processes.

Future Commitments

- Formalise Modern Slavery Working Group and reporting expectations
- Augment current policies and processes to include human rights considerations



Ethical Recruitment

LAL engages a proportion of indirect workers who support our business with ongoing labour. As this workforce is characterised by migrant or base skilled workers who are more susceptible to exploitation. LAL will be taking considered and targeted steps towards building transparency, implementing due diligence, and building collaborative relationships to mitigate the risk of harm.

	Steps Taken
<input checked="" type="checkbox"/>	Centralised recruitment processes
<input checked="" type="checkbox"/>	Assurances of wages and lack of recruitment fees

Centralised Recruitment

The recruitment process is centralised through our Human Resources department, and all indirect workers are afforded information, rates, and access to grievance mechanisms.

Provisions and guarantees:

- All fees associated with the recruitment of staff through third parties are covered exclusively by LAL.
- LAL also ensures that pay rates are on par with EBA and the relevant award, at minimum, for hired labour and subcontractors.

- Labour hire firms to ensure that all individuals working on LAL contracts receive copies of policies and SOPs, including the agency induction checklist.
- Subcontractors are provided with inductions and policies and are given regular organisational and industry updates through our subcontractor distribution list.

Due Diligence

- Onboarding requires the completion of an SLA to ensure the provision of EBA rates to drivers and the review of terms and conditions by in-house counsel.
- We have a clear pre-engagement process in which we request information to ensure subcontractors and labour hire firms to meet all industry requirements. During pre-group

engagement, rates are reviewed to ensure parity between in-house/external staff.

model will be developed involving labour costing controls to verify that the contract price is sufficient to satisfy minimum statutory requirements.

Next steps

- Introducing measures to address labour rights risks related to indirect workers who perform work for LAL is a key priority for FY23. For LAL, the opportunities include strengthening our prequalification requirements for labour-hire firms and subcontractors and strengthening our monitoring of compliance with human rights contract controls.
- To ensure that LAL does not **contribute to** the risk of exploitation, a sustainable pricing
- We will also take steps to evaluate relationships with contractors and create pre-screening requirements for ongoing relationships.

Future Commitments	
<input type="checkbox"/>	Develop a framework for screening and monitoring labour providers
<input type="checkbox"/>	Engage with labour-hire firms to understand whether LAL’s business model is contributing to pricing pressures
<input type="checkbox"/>	Develop a sustainable pricing model to verify contract prices against statutory requirements
<input type="checkbox"/>	Targeted auditing of key labour-hire firms



Capability & Awareness

Leveraging our communication platforms, we will build internal and external capacity to equip our employees with the relevant knowledge to identify and manage risks and effectively enact due diligence.

In FY23, we will commence a phased and targeted approach to modern slavery training. Moving forward, all staff will have access and be expected to complete an online 20-minute modern slavery module through our training portal (delivered by provider Kineo). We will also prioritise equipping our working group members and executives with contextual and more comprehensive training to build their capacity in this space. As our systems and processes change, we will implement

training to support the uplift of our recruitment and procurement functions, ensuring that staff are cognisant of additional due diligence requirements.

Future Commitments	
<input type="checkbox"/>	Build organisational awareness of modern slavery with mandatory training delivered through our online portals
<input type="checkbox"/>	Provide modern slavery training to key team members, including the executive team and members of the modern slavery working group
<input type="checkbox"/>	Provide targeted training for recruitment and procurement functions



Responsible Sourcing

We have built strong and trusted relationships with our key suppliers through open two-way communication to ensure we work together collaboratively and seamlessly. We will be using this collective approach to strengthen our modern slavery response by embedding the protection of people within our sourcing and monitoring processes with a view to working together where possible to take meaningful action.

Steps Taken	
<input checked="" type="checkbox"/>	Centralised procurement capability with dedicated oversight of company spend
<input checked="" type="checkbox"/>	Longstanding and collaborative relationships with key suppliers

Procurement Process:

LAL has a tight procurement team with significant expertise within the transport industry with centralised decision-making and accountability. Corporate functions provide oversight on all committed spends, and key suppliers have minimum quarterly reviews.

Supplier relationships:

While our evaluative and monitoring criteria have primarily been commercially centred, we have developed longstanding relationships with our suppliers that allow us to better understand their expectations, requirements, and circumstances.

Offshore site visits:

Management conduct pre and post-engagement site visits to offshore labour hire organisation to ensure appropriate working conditions are met and employee welfare is high.

Next steps:

- **Category risk screening:** A key action for FY23 will be a social hotspot assessment of LAL spend

and supplier data to identify modern slavery risks at a category level. This risk analysis will be performed by Edge Environment in January 2023 and will use market models that trace commodities and services across supply chains allowing us to understand our risks from beyond tier one.

Procurement uplift:

- Strengthening human rights due diligence requirements throughout the procurement process will be a key step for our team and include creating a framework that will allow us to mitigate risks and generate value above and beyond the goods and services being procured.

Future Commitments	
<input type="checkbox"/>	Social hotspot assessment to identify modern slavery risk at the category level
<input type="checkbox"/>	Develop category management plans for high-risk category
<input type="checkbox"/>	Augment and improve the utilisation of LAL's Supplier Approval Program to increase onboarding due diligence
<input type="checkbox"/>	Build modern slavery-specific model clauses to be incorporated into high-risk categories
<input type="checkbox"/>	Develop and implement metrics associated with environmental and social performance for supplier monitoring
<input type="checkbox"/>	Consult procurement specialist to create an overarching responsible sourcing framework



Grievance & Remediation

We are committed to hearing the voice of all rights-holders impacted by our business activities and provide internal and external pathways for individuals to submit grievances, concerns, or questions.

	Steps Taken
<input checked="" type="checkbox"/>	Independent grievance mechanisms established and promoted through communications platforms.

Access to grievance mechanisms:

LAL provides various avenues for raising concerns about unethical or illegal business conduct, including modern slavery indicators and risks. We also offer protection to anyone who reports concerns in good faith under our Whistleblower Policy.

Employees can raise concerns or questions by talking directly to managers and supervisors or submitting a claim in writing (email or form).

Whistleblower hotline:

An external and independent hotline (Stop-line) is provided and available to impacted families and suppliers.

This external pathway is promoted on multiple platforms, including our web portal, notice boards, policies and forms.

Escalation protocols:

Clear internal responsibility has been mapped and designated under the whistleblower policy, which includes the CEO, Manager Safety People and Culture, CFO, Company Secretary, and the Group's General Managers, who will undertake the appropriate investigation and report the incident to the CEO and/or Board as deemed appropriate.

Remediation:

Our current remediation approach includes providing counselling services for any impacted party.

Next Steps:

We will be implementing a targeted plan to increase awareness of grievance mechanisms with our high-risk service providers or labourers. We also intend to prepare a remediation strategy that will allow us to respond effectively and decisively to protect and remediate harm in any case of serious exploitation.

	Future Commitments
<input type="checkbox"/>	Targeted promotion of grievance mechanisms through varied mediums (posters, QR codes etc)
<input type="checkbox"/>	Develop a remediation plan specific to modern slavery



Stakeholder Engagement & Collaboration

We have always valued and listened carefully to the voice of our employees, suppliers, and customers and have worked hard to create a positive impact within communities. We will endeavour to extend our current practices to capture more specific insights from members within our value chain and collaborate within our industry to build innovative solutions.

	Steps Taken
<input checked="" type="checkbox"/>	Engaged member within industry bodies
<input checked="" type="checkbox"/>	Actively participate in social impact initiatives within communities

Stakeholder Engagement:

We value the relationships with our customers and suppliers and work collaboratively with others to achieve and deliver our strategy and vision.

Industry collaboration:

We embrace change and utilise our expertise and innovation to improve our business and industry. For this reason, we are active members of industry and accreditation associations to ensure that we can work collaboratively with our peers to generate change. This includes:

- National Road Transport Association (*Melissa Strong: Board Director*)
- NSW Road Freight
- Queensland Trucking Association
- Refrigerated Warehouse and Transport Association (*Nick Lindsay: Board Director*)
- Transport Women Australia Limited
- Women in Trucking Association

Community involvement:

Being 'community supportive' is a core LAL value, and we take measures to participate and engage with local communities responsibly and contribute positively through donations to localised community groups in regional areas.

Next Steps:



- LAL is in a unique position as a direct connection point with over 2,000 farmers. As Australian agricultural sector has a high-risk of exploitative practices, these connections provide an opportunity to build awareness and create conditions on business relationships in relation to labour rights of workers. Where possible, LAL will seek to collaborate and work with customers and stakeholders to build their capacity to ensure and protect the rights of individuals.
- We will also seek opportunities to join forums and multi-disciplinary groups that can provide a unique perspective of emerging modern slavery risks.




	Future Commitments
<input type="checkbox"/>	Map key stakeholder relationships and engage in consultation sessions with identified stakeholders
<input type="checkbox"/>	Adopt a process to engage and build awareness with customers (and their workers) in high-risk agricultural sectors
<input type="checkbox"/>	Create conditions outlining LAL expectations for customers
<input type="checkbox"/>	Identify and leverage opportunities to collaborate with industry peers, non-profit organisations and forums


Measuring effectiveness

To ensure that our strategy is advancing the rights of workers and mitigating modern slavery risk in our operations and supply chain, we have developed an implementation timeline. Where possible, we've aligned key performance indicators to actions, with an understanding that some metrics can only be aligned after we progress through elementary steps. While the majority of our current KPIs represent outputs as we grow in our maturity, we will work towards building outcome-orientated metrics.

Timeline
Phase 1: Jan 2023 – June 2023
Phase 2: July 2023 – June 2024
Phase 3: July 2024 – June 2025

Area	Action	Timeline	Metrics
Governance 	<ul style="list-style-type: none"> Formalise Modern Slavery Working Group (MSWG) and reporting expectations 	Phase 1	<ul style="list-style-type: none"> Modern Slavery Working Group added to governance structure (Action) MSWG submits quarterly reports to the Board (Number) Fair representation of divisions and business functions (ratio)
	<ul style="list-style-type: none"> Augment current policies and processes to include human rights considerations 	Phase 1	
Ethical Recruitment 	<ul style="list-style-type: none"> Develop a framework for screening and monitoring labour providers 	Phase 2	<ul style="list-style-type: none"> Develop key criteria and processes for screening labour providers (Action) 100% of current providers are assessed through a screening framework (Ongoing percentage) 100% of new labour providers are screened (Ongoing percentage)
	<ul style="list-style-type: none"> Engage with labour-hire firms to understand whether LAL's business model is contributing to pricing pressures 	Phase 2	<ul style="list-style-type: none"> 100% of current labour-hire firms are provided with an opportunity to give feedback through quarterly meetings (Percentage)
	<ul style="list-style-type: none"> Develop a sustainable pricing model to verify contract price against statutory requirements 	Phase 3	<ul style="list-style-type: none"> Develop a pricing model tool (action) 100% of relevant staff members are provided with training (Percentage) Model is utilised 100% of the time (Percentage)
	<ul style="list-style-type: none"> Targeted auditing of key labour-hire firms. 	Phase 3	<ul style="list-style-type: none"> Each labour-hire firm has a spot check audit at least once a year (Number)

Capacity & Awareness 	<ul style="list-style-type: none"> Build organisational awareness of modern slavery through mandatory training through our online portals. 	Phase 1	<ul style="list-style-type: none"> 100% of staff complete the online Kineo module
	<ul style="list-style-type: none"> Provide Modern Slavery Awareness training to key team members, including the executive team and members of the modern slavery working group 	Phase 1	<ul style="list-style-type: none"> 1x30 minute sessions provided at executive and senior leadership level (annual number) (Min 12 members to attend) 1x60 minute targeted training session provided to working group members (annual number) (min 12 members to attend)
	<ul style="list-style-type: none"> Targeted training for recruitment and procurement functions 	Phase 2	<ul style="list-style-type: none"> Internal module (webinar) created to support recruitment and procurement roles specific to new systems 100% of staff engaged in procurement or recruitment complete training module (Ongoing percentage)
Responsible Sourcing 	<ul style="list-style-type: none"> Social hotspot assessment to identify modern slavery risk at the category level 	Phase 1	<ul style="list-style-type: none"> Modern Slavery risks mapped at category level (Action)
	<ul style="list-style-type: none"> Develop category management plans for high-risk category 	Phase 2	<ul style="list-style-type: none"> Category plan developed for top 5 high-risk categories (Number)
	<ul style="list-style-type: none"> Augment and improve the utilisation of LAL's Supplier Approval Program to increase onboarding due diligence 	Phase 2	<ul style="list-style-type: none"> Metrics for human rights and modern slavery build into the Supplier Approval Program (action) 100% of new suppliers complete questions before engaging with Lindsay (Percentage) 100% of top 30 suppliers (by spend) onboarded (Percentage)
	<ul style="list-style-type: none"> Build modern slavery-specific model clauses to be incorporated for high-risk categories 	Phase 2	<ul style="list-style-type: none"> 100% high-risk category contracts contain modern slavery clause
	<ul style="list-style-type: none"> Develop and implement metrics associated with environmental and social performance for supplier monitoring. 	Phase 3	
Grievance & Remediation 	<ul style="list-style-type: none"> Targeted promotion of grievance mechanisms through varied mediums (posters, QR codes etc) 	Phase 2	<ul style="list-style-type: none"> % Increase in the utilisation of grievance mechanism 100% of cases investigated within 10 days of receipt 100% of serious cases reported to senior management
	<ul style="list-style-type: none"> Develop a remediation plan specific to modern slavery 	Phase 1	

Stakeholder Engagement & Collaboration 	<ul style="list-style-type: none"> Map key stakeholder relationship 	Phase 1	
	<ul style="list-style-type: none"> Engage in consultation sessions with identified stakeholders 	Phase 2	<ul style="list-style-type: none"> Number of stakeholders engaged (number) Number of types of stakeholders (number)
	<ul style="list-style-type: none"> Adopt a process to engage and build awareness with customers (and their workers) in high-risk agricultural and horticultural sectors 	Phase 3	
	<ul style="list-style-type: none"> Create conditions outlining LAL expectations for customers 	Phase 2	<ul style="list-style-type: none"> 100% of high-risk customers receive modern slavery conditions and expectations
	<ul style="list-style-type: none"> Identify and leverage opportunities to collaborate with industry peers, non-profit organisations and forums 	Phase 3	<ul style="list-style-type: none"> External participation in at least one regular external forum

Conclusion

We recognise that we are only part way through our journey. As with addressing all risks, our approach will remain iterative, built initiative by initiative, remaining responsive to the many challenges of our growing operations and the complexities of our supply chain to constantly improve our approach to modern slavery risk management. We're undaunted by this task. Protecting the safety and rights of all our workforce is central to our values, and our business and people's success depends on being a reputable organisation.

It's the Lindsay Way.

Feedback

We value feedback. Please forward any comments on this statement or requests for additional information to spc@lindsayaustralia.com.au.

Endorsement

This Statement is approved by the Lindsay Australia Board on behalf of all entities covered by this statement.



Kim Lindsay
 CEO/Managing Director