



## **MODERN SLAVERY STATEMENT 2022**

**Wilmar Trading (Australia) Pty Ltd**

**Level 1, 26 Kiln Street**

**Darra, QLD 4076**



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## 1 Reporting Entity

As a large scale, integrated commodity merchandising and supply chain management company, Wilmar Trading (Australia) Pty Ltd (ACN 128 080 455) and its subsidiaries (together the “WTA Group”, “we”, “us” or “our”) are committed to ensuring that the rights of all people working within the operations and supply chains of the company are respected according to local, national and ratified international laws.

This statement by Wilmar Trading (Australia) Pty Ltd, which is required to report under the Modern Slavery Act 2018 (the “Act”), covers the period 1 January 2022 to 31 December 2022.

This statement will describe the structure, operations, supply chain, risks of modern slavery, actions to assess and address those risks and consultation processes for the reporting entity.

Given the global prevalence of modern slavery, we acknowledge that it is not always possible to achieve full transparency and oversight of modern slavery risks within our operations. We recognise that tackling the risk of modern slavery in our supply chains will require our ongoing commitment, dedicated effort and resources, and a willingness to be open and transparent when incidents or concerns relating to modern slavery are identified.

This Modern Slavery Statement has been reviewed and approved by the Board of Wilmar Trading (Australia) Pty Ltd on 29 June 2023.

A handwritten signature in black ink, appearing to be 'M. Albion'.

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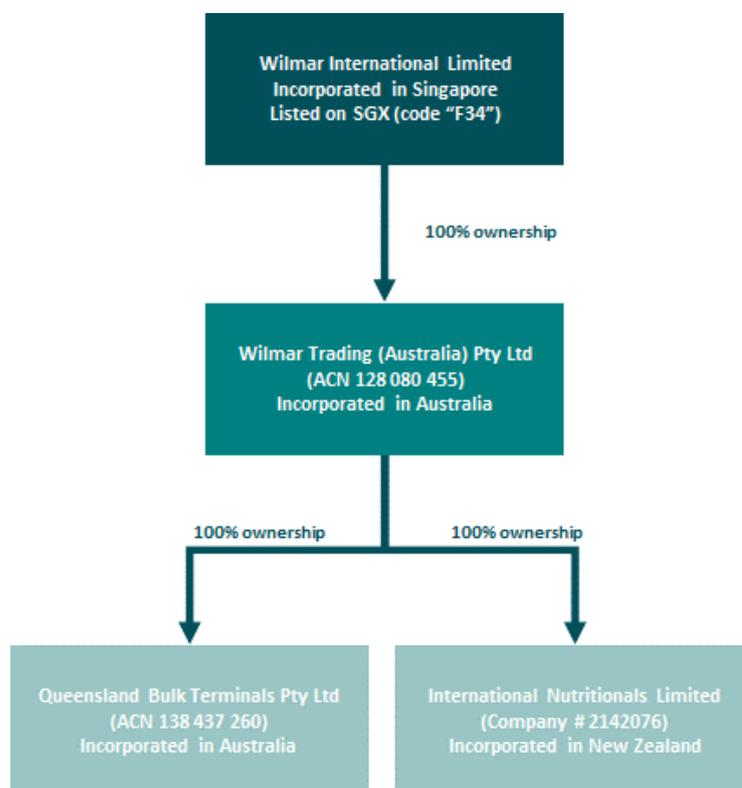
Matthew Albion  
*Managing Director*  
Wilmar Trading (Australia) Pty Ltd



## 2 Our Structure, Operations and Supply Chain

### 2.1 Our Structure

Wilmar Trading (Australia) Pty Ltd (“WTA”) is an Australian private limited company and a reporting entity under the Act. WTA employs approximately 40 staff who are based in either Australia or New Zealand. WTA’s registered office is located at Level 1, 26 Kiln Street, Darra QLD 4076, Australia. WTA is a wholly owned subsidiary of Wilmar International Limited<sup>1</sup>, Asia’s leading agribusiness group and a publicly listed company on the Singapore stock exchange under the trading symbol “F34”. Below is a diagram of the corporate structure of WTA.



WTA has two fully owned subsidiaries being Queensland Bulk Terminals Pty Ltd (“QBT”) and International Nutritionals Limited (“INL”), however both subsidiaries are not considered reporting entities under the Act. QBT is a private limited company incorporated in Australia with approximately 15 staff and operates a bulk dry and bulk liquid export facility, and berth in Brisbane, Australia. INL (which trades as “Agrifeeds”) is a private limited company incorporated in New Zealand with approximately 75 staff that markets, distributes and sells various agricultural animal feeds in New Zealand.

<sup>1</sup> [www.wilmar-international.com/about-us](http://www.wilmar-international.com/about-us)



## 2.2 Our Operations

WTA is a large scale, integrated commodity merchandising and supply chain management company. The principal activities of WTA are the sourcing, trading, marketing and distribution of agricultural commodities in Australia, New Zealand and Asia. These activities involve the purchase and sale of various agricultural commodities in either domestic or export markets, and may involve the logistical storage, handling and transport of physical agricultural commodities within Australia, New Zealand and internationally. WTA has offices in both Australia and New Zealand, with its head office located in Brisbane, Australia. WTA also has a bulk export port facility in Brisbane, Australia (owned by its subsidiary QBT).

WTA purchases agricultural commodities mainly from suppliers based in Australia and New Zealand, where the underlying commodity is originated in these countries, representing 66% of total commodity by metric tonne purchased in the reporting period. WTA additionally has multiple related party transactions with its parent Wilmar International Limited, based in Singapore, which represent 33% of total commodity by metric tonne purchases. Other agricultural commodities are purchased from Asian based suppliers or the USA (1%). However, some of the agricultural commodities purchased from suppliers outside of Australia and New Zealand can be sourced from multiple origins as is common in these commodities (mainly soft oils), which does make tracing the origin of the commodity a challenge.

These agricultural products may be purchased either directly from farmers or from other commodity merchandisers and traders. Agricultural commodities purchased from outside Australia and New Zealand will mostly be purchased from related companies of our parent, Wilmar International Limited, as this forms part of the vertical integration of the broader Wilmar International Limited group of businesses. For purchases of agricultural commodities in Australia and New Zealand, these will be from non-related suppliers such as farmers and other agricultural merchandisers or traders.

Regarding logistics and the movement and handling of commodities, WTA will engage third party providers to provide logistical services, such as road transport, warehousing, product handling and packing and ocean freight in bulk and containers. The exception to this is our port facility located in Brisbane, where we intake, store, handle and load agricultural commodities onto vessels for export via the sea berth located at the site.

Given the nature of agricultural commodity merchandising, for domestic procurement within Australia and New Zealand, this will normally involve purchasing from multiple suppliers under spot or forward purchase contracts. These contracts are short term and typically governed by industry specific contract conditions. The contracts are entered into based on a combination of best quality and best price offered by the supplier. Where procurement is conducted internationally by WTA, this is generally through Wilmar International Limited's related entities, who can provide commodities in bulk volumes and in required specification and allows WTA to leverage the broader Wilmar International Limited group structure within other international markets.

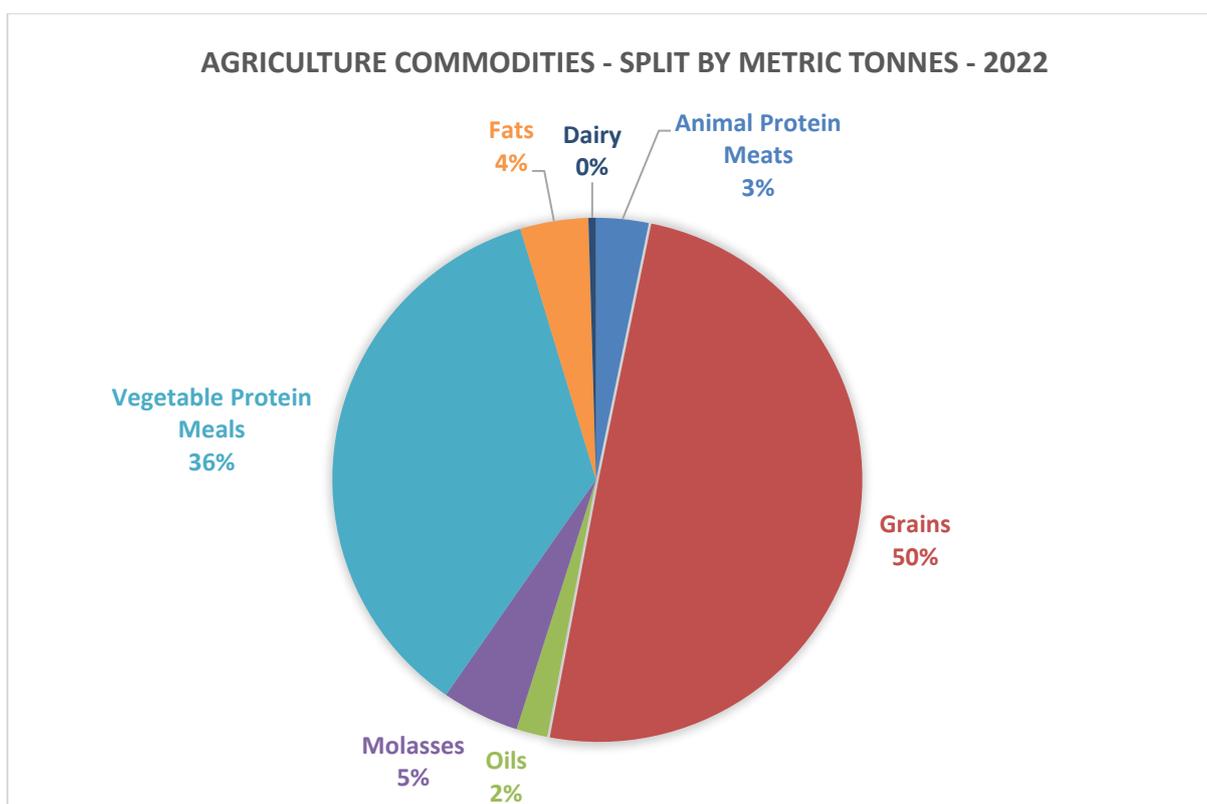
Further information on WTA and its subsidiaries can be obtained at [www.wilmartrading.com.au](http://www.wilmartrading.com.au).



### 2.3 Our Supply Chain

WTA’s supply chain includes the procurement of agricultural commodities, along with logistical services such as storage, transportation and handling of the commodity. The procurement of agricultural commodities is the largest purchase category and is more than 90% of total purchases.

WTA covers a broad range of agricultural commodities as shown below:



In addition to the procurement of agricultural commodities, WTA also utilises a broad range of logistic services which are primarily sourced from within Australia and New Zealand. These logistic services include:

- Storage;
- Transportation via road, rail and ocean freight;
- Handling services, including intake and outturn, packing and analysis of the agricultural commodity;
- Office based support and equipment including IT hardware and systems, stationary and office cleaning.

Agricultural commodities, the related logistical and handlings services and other supplies are purchased from some 900 suppliers across Australia, New Zealand and Asia.



### 3 Modern Slavery Framework

In 2023, we continued to adhere to the 2020 WTA Modern Slavery Framework. A summary of the approach of our Modern Slavery Framework is as follows.

1. **Manage** – Policies and procedures
2. **Identify** – Operations and supply chain review
3. **Mitigate** – Reporting mechanisms both internal and external
4. **Collaborate** – Communication, training and engagement
5. **Evaluate** – Assessment and review

We have discussed how each of these steps have been effectuated in 2022 below.



### 3.1 Manage

To manage and address the risk of modern slavery within our business operations, the following policies were introduced in 2020 and have been implemented from 2020 to 2023. WTA and its subsidiaries have circulated the policies to internal and external stakeholders, and WTA continues to adhere to these policies.

- Modern Slavery Policy
- Wilmar Human Rights Policy<sup>2</sup>
- Wilmar Code of Ethical Conduct<sup>3</sup>
- Wilmar No Deforestation, No Peat, No Exploitation (NDPE) Policy<sup>4</sup>

The Modern Slavery Policy applies to WTA and its subsidiaries and is a clear statement of our commitment to identify and mitigate risks of modern slavery within our operations and supply chains.

The Wilmar Human Rights Policy sets out WTA's expectations of employees and suppliers to conduct business in a responsible and ethical manner, and strives to respect and protect human rights, personal security that is free from harassment or abuse of any kind, and provides a safe, clean and healthy workplace and living environment.

The Wilmar Code of Ethical Conduct ensures that employees are aware of their obligations to maintain an acceptable and satisfactory level of conduct and personal behaviour, which includes a commitment to human rights as required by national legislation or at least, as set forth in the United Nations Universal Declaration of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.

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<sup>2</sup> [https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/human-rights-policyed16f04afc7043738e7579b103a3a15e.pdf?sfvrsn=9378b7f5\\_2](https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/human-rights-policyed16f04afc7043738e7579b103a3a15e.pdf?sfvrsn=9378b7f5_2)

<sup>3</sup> [https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-code-of-ethical-conduct-policy\\_jun2019.pdf?sfvrsn=90af6353\\_2](https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-code-of-ethical-conduct-policy_jun2019.pdf?sfvrsn=90af6353_2)

<sup>4</sup> <https://www.wilmar-international.com/sustainability/policies#ndpe-policy>



Wilmar’s No Deforestation, No Peat, No Exploitation (NDPE) Policy aims to advance an environmentally and socially responsible palm oil industry, as follows.

**No Deforestation, No Peat, No Exploitation Policy**

No Deforestation			No Development on Peat		
No development of High Carbon of High Carbon Stock (HCS) Forests	No development of High Conservation Value (HCV) Areas	No burning	Progressively reduce greenhouse gas (GHG) emissions on existing plantations	Best Management Practices for existing plantations on peat	Where feasible, explore options for peat restoration by working with expert stakeholders and communities

**No Exploitation of People and Local Communities**

Respect and recognise the rights of all workers including contract, temporary and migrant workers	Facilitate the inclusion of smallholders into the supply chain	Free, Prior and Informed Consent (FPIC) from indigenous and local communities to operations on lands to which they hold legal, communal or customary rights	Resolve all complaints and conflicts through an open, transparent and consultative process

Embedded within the NDPE policy is a Complaints and Grievances section which allows employees and/or external personal to raise issues through an open, transparent, and consultative process.

Our policies and procedures continue to be our key base of approach with combating modern slavery and sets out our expectations and framework with identifying, addressing, and mitigating modern slavery within our operations.



### 3.2 Identify

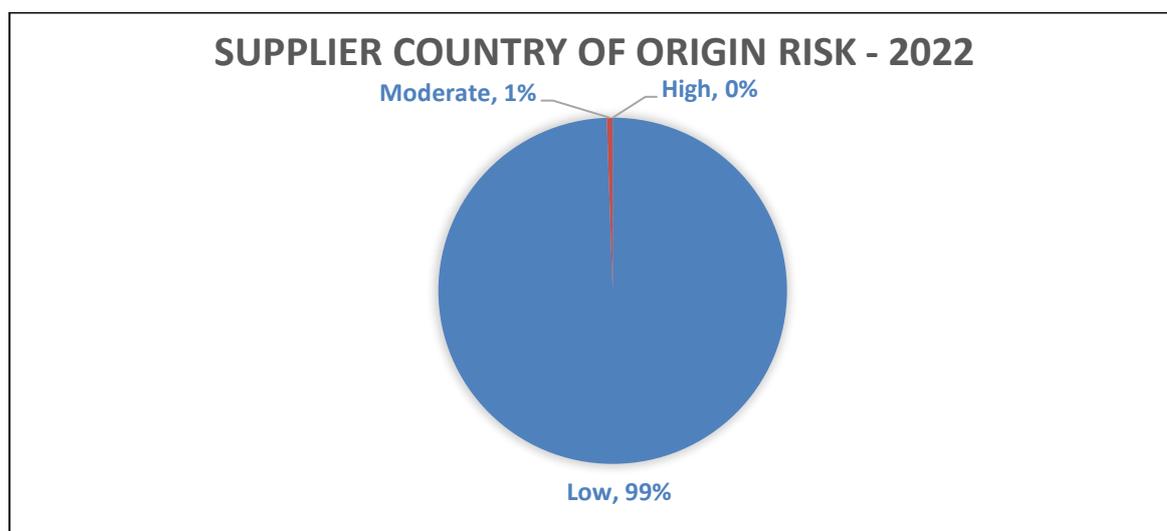
During the reporting period, we performed a risk assessment of all suppliers engaged in the analysis of our operations and supply chains, where we considered the volumes of products purchased (in metric tonnes) and the suppliers' region of operations. Following the assessment, each supplier was assigned a modern slavery risk rating based on their country of operation. Each country's risk rating was based on the Global Slavery Index 2023<sup>5</sup>, published by The Minderoo Foundation.

We have used the "Global Slavery Index 2023 Dataset"<sup>6</sup> table that drives data in the forementioned document to determine a risk level for each country as follows:

- Low risk – countries with prevalence of modern slavery of less than 5 per 1,000 population;
- Moderate risk – countries with prevalence of modern slavery of between 5 and 10 per 1,000 population; and
- High risk – countries with prevalence of modern slavery of 10 or above per 1,000 population.

If no index was available for the country (i.e., due to limited data), the risk was assumed to be high.

Below is a summary of percentage share of total volumes, by risk rating of our suppliers, being either low, moderate, or high.



Our assessment includes a review of the origin of commodities purchased by our business. We determined that purchases of commodities from suppliers within Australia and New Zealand, their commodities originated within these countries.

<sup>5</sup> <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>

<sup>6</sup> <https://www.walkfree.org/global-slavery-index/downloads/>



For commodities purchased from suppliers based outside of Australia and New Zealand, we note that these commodities may have originated in countries different to that of the supplier, and that the commodity may have originated from multiple countries.

We performed further investigation of our moderate-risk suppliers operating outside of Australia and New Zealand and note that 100% of all entities are “related party” entities which belong to our parent company, Wilmar International Limited. As all our policies fall under the umbrella of Wilmar International Limited, where all subsidiaries and joint-ventures must comply with the policies listed in section 3.1, these suppliers are therefore deemed to have a reduced level of risk

We did not engage with any suppliers in 2022 that have a high-risk rating based on their region. Only 1 potential case of potential concern was identified in 2022, related to a tallow supplier in New Zealand (see Annex).

We continued to engage with the broader Wilmar International Limited Group to better understand the risk of modern slavery within our supply chains for these commodities. This revealed that where the commodity purchased was related to palm oil (including its by-products being palm kernel expellant), then Wilmar’s NDPE Policy provides a strong framework to reduce the risk of modern slavery. For other commodities outside of palm oil, the commodity risk rating was assumed to be high, given the challenges in traceability of the product. This represented 0.53% of total purchased volumes during the reporting period and is largely represented by non-palm based soft oils.



### Modern Slavery Risks

In light of the court proceedings mentioned in the previous section, we still consider the risk of modern slavery to be *low* for our operations in Australia and New Zealand given the legislative regime under which they operate, and the policies and management processes we have in place for our employees and contractors. These include:

- Our codes of conduct outlining acceptable workplace behaviour;
- Training programs for our employees;
- Human resources management teams; and
- Clear and independently audited payment systems.

We acknowledge that it is not always possible to achieve full transparency and oversight of modern slavery risks of our suppliers, and particularly where supply chains are located outside the countries of our operations.

We also acknowledge that it is difficult to conduct external and/or third-party individual searches for court cases or articles detailing risk factors for over several hundred vendors, however we are actively collaborating within the related parties under Wilmar International (within Australia) to seek solutions to address this issue and explore third-party risk management platforms to address the risks and exposures related to modern slavery in our supply chains.

During the reporting period, we did not identify any other instances of modern slavery requiring remediation beyond the detailed risk assessment and mitigation measures already described. We have additionally communicated with various suppliers through Corporate Social Responsibility Self-Assessment Questionnaires (SAQ) in 2022 to ensure that our supply chain has the required compliance; and are in the process of updating the WTA SAQ in 2023 to align with Wilmar Sugar and Goodman Fielder (being Australian related parties under Wilmar International), specifically to include explanatory information on some questions in order to provide the supplier with further context and relevance to modern slavery.



### 3.3 Mitigate

Effective due diligence involves regular assessment, including review of concerns raised through our grievance reporting mechanisms.

During 2022, we implemented one or more steps from the below action plan for any external suppliers posing a level of modern slavery risk at the moderate or high end of the scale, being Value Proteins Ltd only, described in detail within Section 3.2 Identify – Media and court rulings. This supplier was uniquely identified via a media article online and not via our region risk-based approach.

- 1) Assessment of human rights risks relevant to the grievance or issue raised.
- 2) Root cause analysis specific to the grievance or identified issue, carried out in consultation with affected parties or their chosen representatives.
- 3) Corrective actions to address non-compliance.
- 4) Remediation action, developed in consultation with the affected parties or their chosen representatives.
- 5) Systemic changes required of the supplier (e.g., new systems, training, new expertise) to address the root causes.
- 6) Progress indicators and monitoring activities agreed between the parties.
- 7) Commitment to regular communication and dialogue on progress against the action plan.
- 8) Refusal to engage further with the supplier.

Based on our region risk-based approach, we have identified 3 suppliers posing a level of modern slavery risk at the moderate scale:

Supplier risk of modern slavery	Number of suppliers	Mitigation
Moderate risk	3	All companies identified in this category fall under the umbrella of our parent company, Wilmar International Limited, which comply with all group-wide policies. As such these entities are deemed to have a reduced level of risk and we have not yet found it necessary to implement any of the above mitigation measures.



### Training & Capacity Building

We aim to ensure that employees and suppliers clearly understand our expectations regarding Modern Slavery and Human Rights. We have engaged with suppliers both formally and informally as part of the selection and retention process to:

- 1) Ensure they are aware of Wilmar's policies and requirements with regards to Modern Slavery and Human Rights.
- 2) Understand the supplier's perspective and the challenges they face; and
- 3) Share information on the risks of modern slavery, their contractual obligations and the expectations of businesses Wilmar engages with.

In 2022, we continued to raise awareness among WTA employees through training, seminars and circulating key material.

We measure our effectiveness through metrics such as:

- The number of SAQs completed by moderate and high-risk external suppliers.
- The quality of information provided to employees and level of feedback received subsequent to circulation.
- Number of complaints or issues raised via the confidential communication channel noted below.
- Collaborative action plans developed in conjunction with suppliers.

Our Whistleblowing Policy<sup>7</sup> provides our employees a confidential avenue for reporting concerns about possible corporate improprieties and establishes a framework for independent investigations. We have not identified any modern slavery red flags for the reporting year from this process.

Further, we continue to operate under Wilmar International Limited's Human Rights Framework<sup>8</sup> which operates a Grievance Procedure that provides confidential avenues for suppliers or other interested third parties to raise potential concerns or perceived issues regarding human rights within our operations or supply chains.

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<sup>7</sup> [https://www.wilmar-international.com/docs/default-source/default-document-library/highlights/sustainability/2016/08/wilmar-whistleblowing-policy.pdf?sfvrsn=a79a6564\\_2](https://www.wilmar-international.com/docs/default-source/default-document-library/highlights/sustainability/2016/08/wilmar-whistleblowing-policy.pdf?sfvrsn=a79a6564_2)

<sup>8</sup> <https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/human-rights-framework.pdf>



### 3.4 Collaborate

With our Modern Slavery Policy and our Wilmar Human Rights Policy, we are working to ensure that our employees and suppliers clearly understand our expectations. We plan to further engage with suppliers to:

- Raise awareness of our Modern Slavery Policy and Wilmar Human Rights Policy requirements;
- Better understand our suppliers' perspective and challenges they face; and
- Share information on modern slavery and expectations of suppliers within whom we engage.

We provide training to our employees and contractors, to build capacity and raise awareness of the risks of modern slavery within our operations and supply chains, so that our employees clearly understand what our expectations are, to mitigate and ultimately eliminate the risk of modern slavery.

Development and implementation of policies and processes to address modern slavery risks in our operations and supply chains has involved cross-functional groups as well as other related entities, in order to encourage employee collaboration, understanding and to build further capacity.



### 3.5 Evaluate

WTA is committed to promoting and fostering a culture of continuous improvement with our employees and suppliers to identify and address modern slavery risks. We are working to assess the effectiveness of our actions and to refine our approach, as necessary. Our effectiveness may be measured by metrics such as:

- Review of the Modern Slavery Framework and associated processes;
- Training programs delivered;
- Number of complaints or issues raised via the confidential communication channel;
- Number of any instances of modern slavery identified within our operations or supply chains;
- Collaborative action plans developed in conjunction with suppliers; and
- Continuous evaluation of our suppliers.

Our risk criteria, existing supplier risk profiles and supplier selection processes will be reviewed at appropriate intervals to take account of new or emerging modern slavery risks and to ensure they are effective in identifying the risk of modern slavery in our supply chains.

Consistent with this, we will:

- Engage with suppliers and other external stakeholders to share our Wilmar Human Rights Policy and our Modern Slavery Policy;
- Encourage suppliers, customers, employees and other stakeholders to report any instances of modern slavery that they may have identified, as well as any potential risks of modern slavery or related concerns; and
- Engage with suppliers to develop and foster relationships which support open communication.



## 4 Consultation Between Entities

WTA's Modern Slavery Statement has been prepared with input from across the company and its controlled entities.

WTA and its controlled entities are governed by the same policies, senior management and relatively consistent board members. There has been significant engagement, education and collaboration across the business functions.

Internal stakeholders have been critical to our due diligence program, providing key information required to successfully carry out the assessment.

Consultation has also been conducted with the broader Wilmar International Limited Group of entities.



## 5 Mandatory Reporting Criteria

This statement was prepared to meet WTA’s reporting requirements under the Modern Slavery Act 2018. The table below references where the mandatory criteria set out in the Act are addressed within this statement.

Mandatory criteria	Reference in this statement
<b>Criteria 1.</b> Identify the reporting entity	Section 1 Reporting Entity
<b>Criteria 2.</b> Describe the reporting entity’s structure, operations and supply chains	Section 2 Our Structure, Operations and Supply Chain
<b>Criteria 3.</b> Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 3.2 Identify
<b>Criteria 4.</b> Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Section 3.1 Manage Section 3.2 Identify Section 3.3 Mitigate
<b>Criteria 5.</b> Describe how the reporting entity assesses the effectiveness of these actions	Section 3.5 Evaluate
<b>Criteria 6.</b> Describe the process of consultation with any entities the reporting entity owns or controls	Section 3.1 Manage Section 3.4 Collaborate Section 4 Consultation Between Entities
<b>Criteria 7.</b> include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Section 3.2 Identify – Media and court rulings



## 6 Annex

### **Media and Court rulings**

We have been monitoring the media including court cases during FY22 with relation to our vendors, and note that in June 2022, a NZ vendor owned by Gloriavale Christian Community was engaged in a court case with allegations of modern slavery related risk factors against them.

We performed relevant mitigation actions per section 3.3 Mitigate, culminating in Step 8 being enforced as we suspended all further activity with the vendor. We are engaging in ongoing communication with the vendor in order to obtain the relevant remediation documents that will allow us to resume business with them.

Furthermore, we have maintained perpetual communication with related parties regarding this vendor to ensure the Group policies are being adhered to.