



VICKERY BROS.

THE FERTILISER PROFESSIONALS

Modern Slavery Statement 2025

Foreword

***No one shall be held in slavery or servitude;
slavery and the slave trade shall be prohibited in
all their forms.***

Article 4, Universal Declaration of Human Rights

Vickery Bros Pty Ltd is an independent family owned and operated business with strong ties to the community.

Vickery Bros is committed to social responsibility, and strives to ensure that its operations are ethically managed.

We are dedicated to identifying the risk of modern slavery, both in our business and that of our suppliers, and taking action to prevent and reduce its occurrence wherever possible.



A handwritten signature in black ink, consisting of stylized, overlapping loops and lines, representing the name Geoffrey Vickery.

Geoffrey Vickery
Managing Director

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About Us

This Modern Slavery Statement is made on behalf of Vickery Bros Pty Ltd (ACN 007 190 614) pursuant to Section 13 of the Modern Slavery Act 2018 (Cth).

This statement provides information regarding Vickery Bros' operations, actions and goals with respect to identifying and mitigating risks of modern slavery within its business and supply chains for the 1 July 2024 to 30 June 2025 reporting year (Current Reporting Period).

Reporting Entity

Vickery Bros Pty Ltd (ACN 007 190 614) (Vickery Bros) is an Australian private company primarily operating as an independent supplier of fertiliser to farmers in Western Victoria and the South East of South Australia.

Established in 1948, the company is headquartered in Coleraine, Victoria. We operate a network of depots across South West Victoria and South East South Australia.

Structure

Vickery Bros has a controlling influence^[1] over small businesses, Coleraine Fuel Supplies Pty Ltd (ACN 005 432 057) trading as Western District Motor Traders (Motor Traders), Western District Truck Wreckers Pty Ltd (ACN (ACN 060 552 543) (Truck Wreckers) and Southern Soils Pty Ltd (ACN 614 915 963) (Southern Soils).

Vickery Bros employs 87 full-time, part-time and casual staff, 82 of which are employed under Australian employment contracts, which mitigates the risk of modern slavery within our direct operations. The remaining 5 employees hold visas and hail from the United Kingdom (1), Philippines (2), Armenia (1) and Papua New Guinea (1).

Vickery Bros is an Approved Sponsor within the Great South Coast Region of Victoria under a Designated Area Migration Agreement (DAMA). Motor Traders and Truck Wreckers do not employ any employees, while Southern Soils employs 3 employees under Australian employment contracts.

^[1] Section 50AA Corporations Act 2001 (Cth)

Our Business

Vickery Bros' core business activity is agricultural supply and logistics across South Western Victoria and South Eastern South Australia.

Port to Paddock

Vickery Bros offer a port to paddock service by supplying, delivering and spreading fertiliser to farmers and the forestry industry.

Fertiliser is collected by the company's logistics arm from the Ports of Portland and Geelong, and delivered to our depots, or directly to farms or forestry sites.

Fertiliser is spread on farms and in commercial forests via specialty spreading trucks or by aerial drones. Our drones also spray pesticides as required.

Our fleet of trucks, plant and equipment is maintained in-house, in our Coleraine mechanical workshops.

As an adjunct to our core service, we provide agronomy services by Fertcare accredited agronomists. This service includes advice, soil sampling and analysis (Vickery Bros, Southern Soils).

Fertiliser Supply

Our depot locations in Victoria (Coleraine, Hamilton^[1], Casterton, Heywood, Edenhope and Neuarcurr) and South Australia (Mount Gambier) supply both liquid^[2] and granulated^[3] fertiliser to farmers and forestry operations in Western Victoria and the South East of South Australia. We also supply associated products, such as soil conditioners and coatings^[4].

Our other operations

- The sale and distribution of concrete and associated products from our Casterton, Edenhope and Neuarcurr concrete depots in Victoria. Our customers are based in Western Victoria and the company's offering is limited to this geographic region.
- Freight and logistics services
- The processing, sale and distribution of lime from our lime yard in Coleraine and Casterton.
- The extraction, sale and distribution of sand on 17 leased sand tenements in Western Victoria.
- Our maintenance team maintains our buildings and infrastructure.
- We have a large dedicated mechanical workshop based in Coleraine, which services all our trucks, vehicles, plant and equipment. This includes a panel/paint shop, metal fabrication workshop and dedicated tyre fitting operation.
- Land, vehicle, plant and machinery leasing.
- Farming - hay, silage, cattle and sheep, wool production.

[1] Hamilton being a combined Southern Soils and Vickery Bros depot

[2] UAN, Zinc Sulphate, Manganese Sulphate, Copper Sulphate, Calcium Nitrate

[3] Urea, Single Superphosphate, Mono-Ammonium Phosphate, Di-Ammonium Phosphate, Muriate of Potash, Sulphate of Ammonia, Sulphur Bentonite, Sulphate of Potash

[4] Controlled Release, Micro Nutrient Coated, Compound and Fungicide Treated Fertilisers and Organic Products

Supply Chain

Procurement

Given our operational scope, our supply chain is diverse:

- **Raw Materials:** Procurement of bulk fertilisers from domestic and international suppliers.
- **Mining Supplies:** Acquisition of heavy machinery, equipment, and safety gear required for our sand mining and quarrying activities.
- **Logistics and Fleet Management:** Procurement of vehicles, maintenance services for our extensive fleet of trucks and spreading equipment not provided for in our workshop (i.e. auto-electrical), procurement of fuel and vehicle parts.
- **General Corporate Services:** Acquisition of general goods and services such as uniforms, cleaning services, office supplies, and IT infrastructure.

The diverse nature of our operations, spanning mining, logistics and agriculture, means we interact with a broad range of suppliers whose practices require ongoing diligence.

During the Current Reporting Period, Vickery Bros engaged with over 500 suppliers. Given the diversity of our operations, we source a variety of goods from suppliers. These goods are usually sourced from a variety of locations (see also Figures 1 and 2 on the next page), such as:

| Group | Goods/Services | Usual Origins |
|-------------------------|--|--|
| Fertiliser | UAN, Zinc Sulphate, Manganese Sulphate, Copper Sulphate, Calcium Nitrate, Urea, Single Superphosphate, Mono-Ammonium Phosphate, Di-Ammonium Phosphate, Muriate of Potash, Sulphate of Ammonia, Sulphur Bentonite, Sulphate of Potash, soil testing services, blending plant, machinery | Australia, Saudi Arabia, United Arab Emirates, Qatar, China, Indonesia, Malaysia, United States, Morocco, Canada |
| Logistics | Trucks, vehicles | Germany, Poland, Slovakia, South Africa, Turkey, Thailand, Japan, China |
| Extraction and Concrete | Plant and machinery, cement, associated goods and chemicals | Australia, United Kingdom, United States, Brazil, China, Mexico, the Netherlands, Northern Ireland, Italy, Japan, India, the Philippines and Vietnam |
| Mechanical | Engine parts, tyres, oil, chemicals | Australia, China, Japan, United States, Mexico, Germany, France, South Korea, Thailand, India, Saudi Arabia, Russia |
| Technical | Computers, phones, IT services, software, peripheral devices | China and Malaysia |
| Uniforms/PPE | Workwear and PPE | China, Vietnam, Indonesia and Malaysia, Bangladesh, India, Argentina and Brazil |
| Maintenance | Building materials | Australia, China, Malaysia, Indonesia, Russia, Brazil, Peru and United States |
| Packaging | Bulka bags | Australia, China, Vietnam, India and Sri Lanka |
| Farming | Stock feed, plant and equipment | Australia, Thailand and New Zealand |
| Other | Office consumables, energy and utilities, postal services, drug/alcohol testing equipment and laboratory services | Australia, China, India, Bangladesh, and Vietnam |

Supply Chain

FIGURE 1: Potential Risk - Usual Origin Country

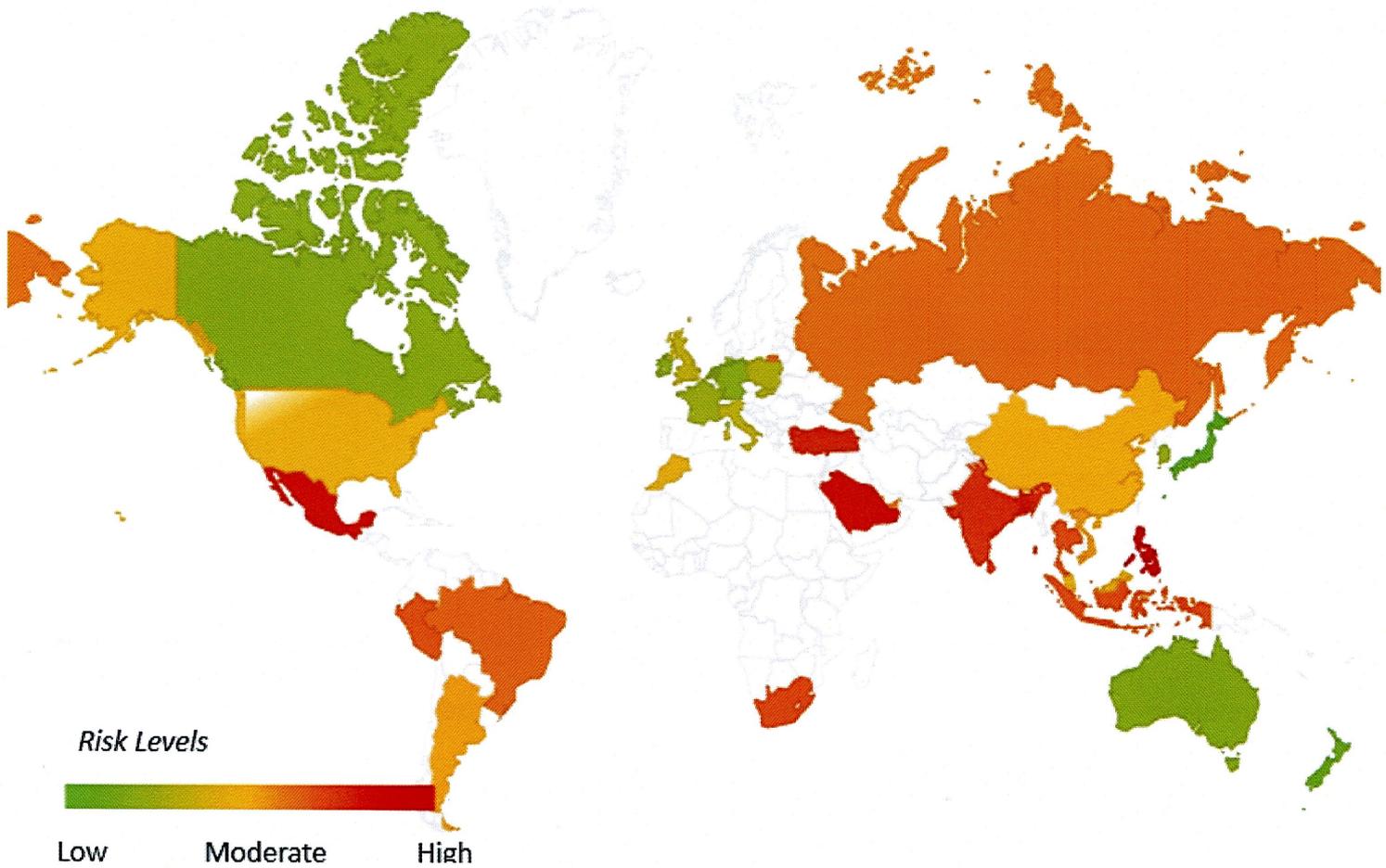
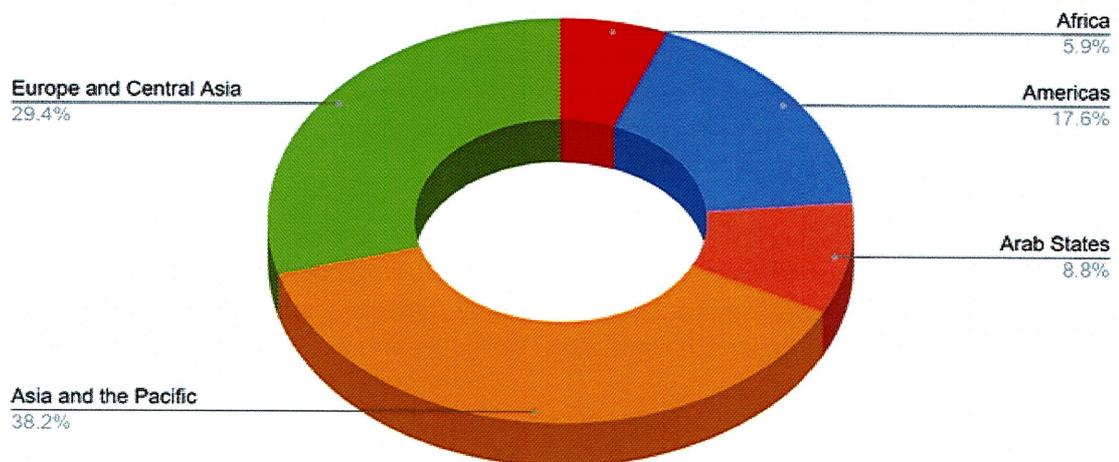


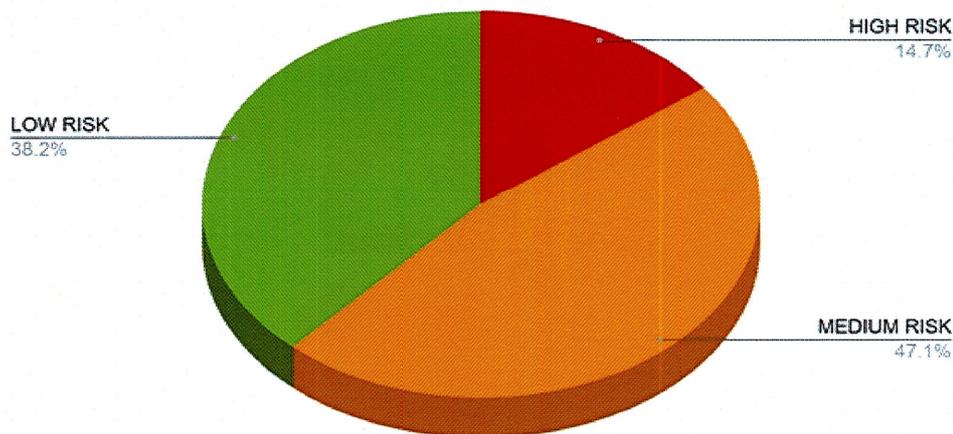
FIGURE 2 Potential Risk - Usual Origin Country by Region



Modern Slavery Risk

We consider the risk of modern slavery in our direct operations (our employees) to be low, due to our skilled workforce and compliance with Australian labour laws and modern awards. As noted in paragraph 4 above, our initial scoping of goods and services source countries by usual origin of product type, suggests a potential moderate (47.1%) to low (38.2%) risk of modern slavery in our supply chain (see Figure 3 below):

FIGURE 3: Potential Supply Chain Risk Level



With reference to the Walk Free 2023, Global Slavery Index 2022[1] (GSI), we have identified that the following risks may be present in our supply chains:

| | |
|-------------------|--|
| Geographic | Our Tier 1 suppliers may import products from a number of countries identified as high risk under the GSI. These materials or components are being sourced from countries with high inherent modern slavery risks or weak governance. |
| Industry | The agricultural sector is recognised globally as a high-risk industry. Migrant and/or itinerant labour may be used by our suppliers (through both contracted services such as cleaning, or labour used in the production of our ingredients) and on farms supplying raw materials. Further, the transport and logistics sector is also recognised as a higher-risk industry for modern slavery. |
| Product | We acquire a variety of products and services from our suppliers that are considered to be high-risk, including but not limited to raw materials, personal protective equipment/uniforms, packaging, electronics, shipping and freight, and IT procurement. |

[1] <https://www.walkfree.org/global-slavery-index/>

Actions Taken

We recognise that reduced visibility beyond our Tier 1 suppliers increases the risk of connection to modern slavery in our supply chain's lower tiers.

Policy

We have implemented a Modern Slavery Policy, wherein Vickery Bros has made a commitment to:

- Ensure that leadership at all levels demonstrates through actions, accountability and commitment, the promotion of a zero tolerance for modern slavery.
- Complying with modern slavery laws, both domestically and internationally as required;
- Promote an awareness of modern slavery and human rights to its employees and suppliers.
- Continuous improvement of modern slavery data collection and reporting systems to ensure they effectively capture emerging risks.
- Work with suppliers and employees ensure that modern slavery risks are identified and mitigated.
- Embracing innovation and technologies wherever reasonably practicable to identify, monitor and mitigate against modern slavery,
- Equipping its people with information, training and resources to empower them to identify and mitigate modern slavery risks; and
- Fostering work relationships in order to integrate modern slavery mitigation into work processes wherever possible.

This policy has been published on our website and has been made available to all Vickery Bros employees via our HR platform. Our HR platform also provides an anonymous means of reporting instances of suspected modern slavery. Our Whistleblower Policy has been amended to reflect the objectives of our Modern Slavery Policy and allow for anonymous disclosure of potential or actual human rights breaches.

Codes of Conduct

Our Employee Code of Conduct is currently being updated to better reflect our values and commitment to human rights.

We have now also implemented a Modern Slavery Supplier Code of Conduct (Supplier Code) which reflects our zero-tolerance approach to modern slavery and human trafficking. The Supplier Code sets out the minimum standards expected of all our suppliers. Supplier Code compliance includes self-assessing against the Supplier Code and taking necessary actions to correct non-compliance. Under the Supplier Code, we may request evidence and confirmation of compliance with the Supplier Code and may cease dealing with any supplier found to have acted in non-compliance, illegally or unethically. Communication of our expectations to all suppliers will commence in the next reporting year, requiring their adherence to our ethical standards and Australian laws through our Supplier Code. Our Supplier Code will be published on our website and will be made available to all existing and new suppliers.

Training

Awareness training to relevant employees on our Supplier Code, Modern Slavery Policy and Whistleblower Policy, and identifying and responding to modern slavery risks has commenced and will continue in the next reporting year and annually thereafter.

Actions Taken

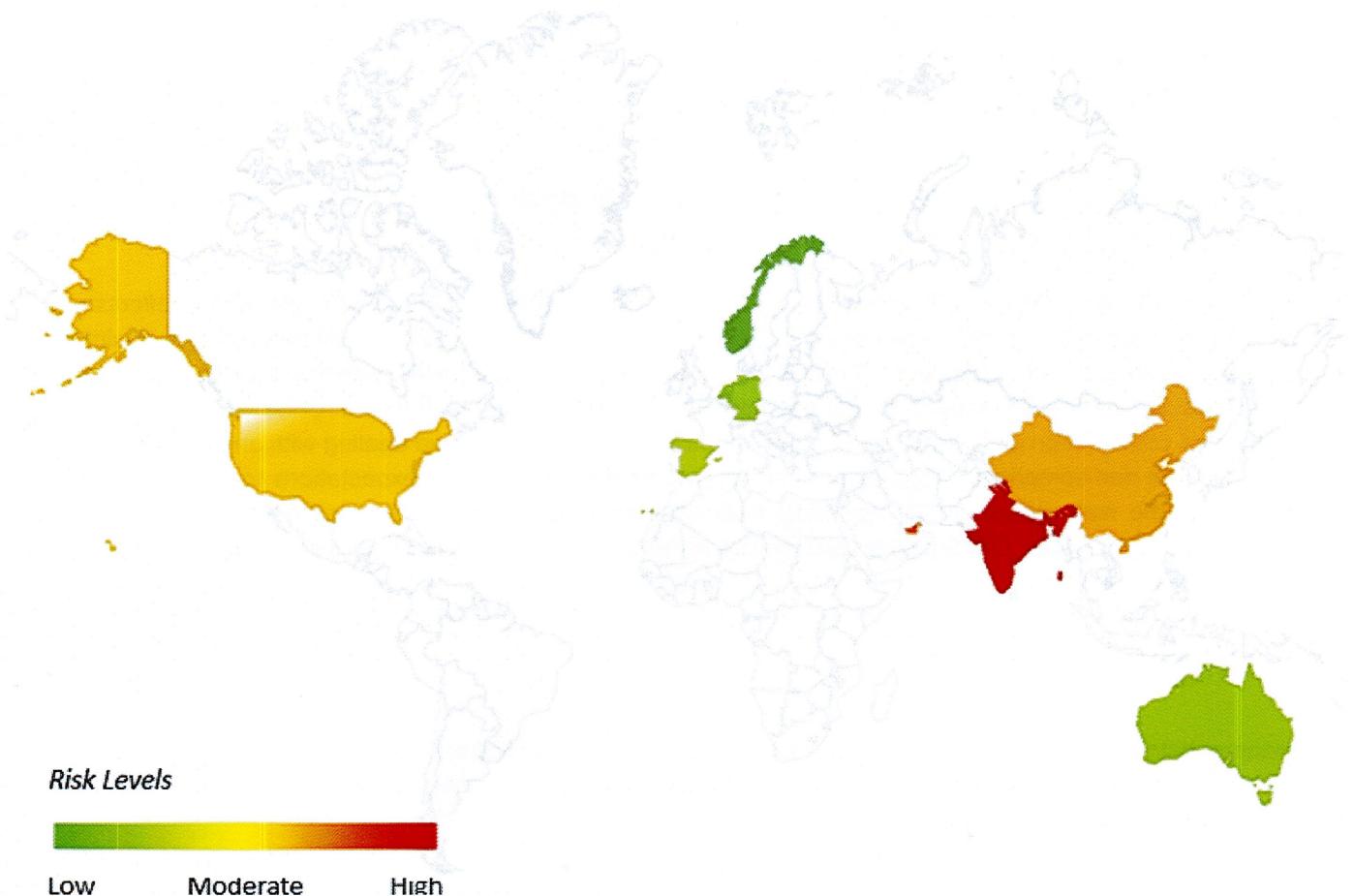
Questionnaires

We have identified our Tier one suppliers. In the Current Reporting Period we have sent out Modern Slavery Questionnaires to ten suppliers determined to have the greatest potential for a high risk of modern slavery within their supply chains. All remaining suppliers will be provided with a Modern Slavery Questionnaire for completion and return.

Of the suppliers thus far asked to complete our Modern Slavery Questionnaire, three suppliers have completed the questionnaire; two have provided us with their most recent Modern Slavery Statement and five have not yet responded. Data received to date from these Suppliers indicates that goods and/or services are sourced by them from Australia, United Kingdom, United States, Brazil and China.

Each supplier was allocated an overall risk rating score based on responses to questions determining risk with the three categories of geographic source, industry action (i.e. actions taken within their organisation to mitigate against modern slavery in their organisation or supply chain) and product types acquired by them. The top ranked third being considered a High Risk, the mid third being a Moderate Risk and the lower third being a Low Risk.

No responding supplier noted negative modern slavery or human rights issues within their organisation or supply chain.



Assessing Effectiveness

Assessing Effectiveness of Actions

We will assess the effectiveness of our actions through the following mechanisms:

| | |
|--------------------------------|---|
| Ongoing risk assessment | Requesting updated Modern Slavery Questionnaires from suppliers on a regular basis. |
| Identifying | Identification of high-risk suppliers. |
| Supplier Compliance | Tracking the percentage of high-risk suppliers who have acknowledged and committed to our Supplier Code of Conduct. |
| Grievance Mechanisms | Monitoring our internal whistleblower system and other reporting channels. No modern slavery concerns were raised during this reporting period. |
| Policy Review | Annual review of our Modern Slavery Policy, Code of Conduct and Supplier Code of Conduct to ensure they remain relevant and effective. |

We aim to set specific Key Performance Indicators (KPIs) in the next reporting period related to supplier audits and training completion rates to improve our assessment process.

Consultation

This statement was developed in consultation with key departments across Vickery Bros Pty Ltd, including the Operations, Agronomy, Workshop, Human Resources, IT and Executive teams.

This collaborative approach ensures that all areas of the business are involved in identifying and assessing potential risks. The final statement was reviewed and approved by the General Manager and Managing Director.

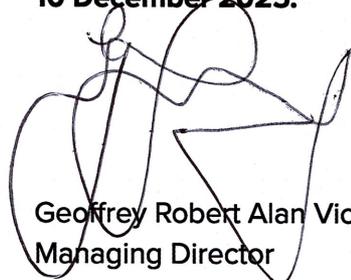
Other Information

Vickery Bros Pty Ltd is committed to continuous improvement in our approach to human rights.

We recognise that addressing modern slavery is an ongoing process and we will continue to develop and embed due diligence processes into our business practices.

Board Approval

This statement was approved by the Board of Vickery Bros Pty Ltd and is signed by Geoffrey Robert Alan Vickery in his role as the managing director of Vickery Bros Pty Ltd on 10 December 2025.



Geoffrey Robert Alan Vickery
 Managing Director
 Vickery Bros Pty Ltd
 10 December 2025

Vickery Bros Pty Ltd
96 Whyte Street
Coleraine
Victoria 3315
t: +61 3 5575 2777
e: compliance@vickerybros.com
w: vickerybros.com

