



Modern Slavery Act Statement

As at 30 June 2025

Statement

AgTrade is an Australian-owned livestock, genetics, and food security group headquartered in Brisbane, Australia. Guided by our vision to *feed the world with purpose, creativity, and care*, we operate a diverse portfolio of agribusinesses that share a commitment to building and sustaining long-term export markets for Australian primary producers.

We recognise our responsibility to act as a socially responsible organisation that is genuinely committed to preventing and addressing modern slavery risks within our operations and supply chains. Our activities play a key role in supporting primary producers and rural communities, both in Australia and internationally.

AgTrade continues to enhance its understanding of modern slavery risks through operational risk assessments and reviews of our Tier 1 suppliers. We reinforce human rights principles across our sphere of influence in accordance with the Modern Slavery Act 2018 (Cth) (“the Act”).

We are committed to continuous improvement as we strengthen our risk awareness and refine our controls. Our long-term planned actions include:

- Embedding supplier categories into our procurement system to better identify higher-risk suppliers and respond effectively to potential instances of modern slavery.
- Ongoing monitoring of our Tier 1 suppliers and extending due diligence beyond Tier 1, where reasonably practicable.
- Establishing measures to evaluate the effectiveness of our modern slavery actions, such as following up with previously engaged suppliers to assess progress and identify further opportunities to enhance.
- Developing an internal roadmap as part of our ESG strategy that outlines future actions and key milestones.

Criteria 1: Identify the reporting entity

This is a joint modern slavery statement under the Modern Slavery Act 2018 (Cth) for the reporting period 1 July 2024 to 30 June 2025 (“Reporting Period”) on behalf of the following reporting entities (together, the “Reporting Entities”):

- AgTrade International Pty Ltd (ACN 139 280 461)
- AgTrade Holdings Pty Ltd (ACN 627 070 606)
- Australian Rural Exports Pty Ltd (ACN 009 933 831)
- Paradigm Foods Pty Ltd (ACN 600 978 434)

In addition to the Reporting Entities, this statement also covers the operations and supply chains of the following controlled Non-Reporting Entities which form part of the Group:

- AgTrade Financial Pty Ltd (ACN 626 891 932)
- AgTrade Pastoral Pty Ltd (ACN 154 147 912)
- HA Hold Co Pty Ltd (ACN 654 410 750)
- NatureBase Pty Ltd (ACN 660 359 339)

Collectively, these reporting and non-reporting entities are referred to as the “AgTrade Group” or “AgTrade”. References to “we”, “us”, and “our” include all members of the AgTrade Group.

Criteria 2: Describe the reporting entity's structure, operations and supply chains as of 30 June 2025

AgTrade International Pty Ltd is the parent entity of the Group, comprising several wholly and partially owned subsidiaries that operate autonomously with equity and debt funding provided by the Group.

These businesses align with AgTrade's overarching investment, finance, and risk management frameworks, which emphasise social responsibility, environmental stewardship, and sound governance.

Our key operating businesses for FY25 are:

- AUSTREX (Australian Rural Exports Pty Ltd) – an exporter of premium livestock and genetics, including dairy and beef cattle.
- Paradigm Foods Pty Ltd – a premium beef and lamb processing and export business.
- Hay Australia (HA Hold Co Pty Ltd) – a hay processing and export business trading animal feed domestically and internationally.

AgTrade's Tier 1 supply chain consists of some 1,500 suppliers across a broad range of categories, from small family-owned enterprises to large corporations. The largest expenditure categories across the Group include:

- Procurement of agricultural commodities such as cattle, hay, and other products.
- Transportation costs (road, rail, air, and sea freight).
- Processing costs related to meat and hay production.
- Animal management services, including agistment, feedlots, veterinary, and related services.

Our supply chains extend from farm gate to the final delivery of products to customers, both domestically and internationally. Product quality, traceability, and animal welfare standards are central to our brand and long-term success.

During the 2025 year, we primarily sourced livestock and commodities from Australia. Livestock may be placed on third-party rural properties for agistment, and we also maintain our own breeding herds in Tasmania and Queensland.

To prepare livestock for domestic processing or export, we engage a range of rural businesses providing services such as transport, feedlot operations, quarantine, and veterinary care. We also contract accredited abattoirs for meat processing and specialist freight providers for international transportation.

Criteria 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

During the reporting period, our Tier 1 suppliers were based in approximately 20 countries, but with the majority (by expenditure) located in Australia.

Our workforce comprises approximately 150 employees, primarily based in Australia with additional staff located in New Zealand and Indonesia.

A risk assessment of our supply chains was conducted, using a risk-based approach that compared supplier country origins with the Walk Free Global Slavery Index 2023 (Minderoo Foundation).

Based on this analysis:

- 99.9% of our procurement spend was from countries considered low risk for modern slavery.
- 0.1% originated from countries classified as medium risk.

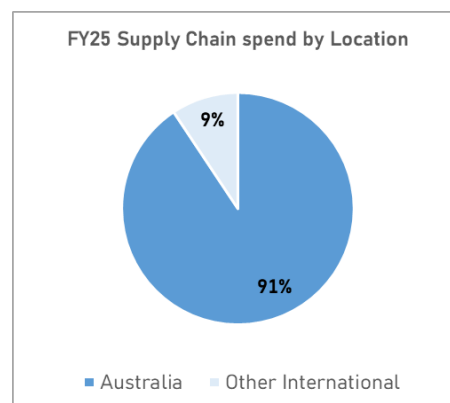
Accordingly, AgTrade's overall modern slavery **risk exposure is assessed as low**.

Additional findings include:

- Several major suppliers publish their own Modern Slavery Statements or equivalent assurances.
- All employment contracts—domestic and international, comply with local labour laws and clearly define fair employment terms.

The chart to the right depicts our percentage of supply chain expenditure by location of supplier, which shows that 91% was spent within Australia. Of the 9% relating to Other International, the majority of this was one supplier who has committed by way of Board approval to improving practices to combat slavery and human trafficking within their business and their supply chain under the United Kingdoms' Modern Slavery Act 2015.

Whilst we have assessed our overall risk as low, we recognise that visibility gaps may exist within our supply chain and the supply chains of our suppliers.



Criteria 4: 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

Due diligence, systems and related actions

Area	Status and actions
Australian farms and primary producer properties	We share this supplier class with other major food supply chains. We continue to engage with industry associations and stakeholders to promote transparency and best practice.
Transport (air, land and sea)	Many key transport providers supply their own Modern Slavery Statements or Board-level assurances. We actively encourage suppliers to assess their own risks and responsibilities.
Recruitment and Selection Policy	We gain assurances from our third-party HR Business Partners to ensure our recruitment and selection processes are efficient, robust and delivered in a manner that ensures candidates are treated fairly, equitably and consistent with legislative requirements and stakeholder expectations.
Employment and engagement terms	<p>All staff are employed under formal employment agreements.</p> <p>While most of our approximately 150 team members are located in Australia, we also have some team members located in New Zealand and Indonesia.</p> <p>We regularly obtain legal and other professional advice to ensure that employment and other team engagement terms are compliant and maintained appropriately.</p>
Employee education and awareness	All new employees must complete an online Modern Slavery module via the AgTrade Learning Portal as a part of their Onboarding process. Refresher training is required annually for existing staff.
B-Corp Certification	Paradigm Foods (a subsidiary of AgTrade) became a Certified B Corporation in 2023, reflecting its high standards in social and environmental performance.
Policies and Procedures	AgTrade maintains a comprehensive policy framework that defines expected conduct of staff, and which reinforces the expectation of ethical and lawful behaviour across all its operations.

Key Policies

Policy/Procedure	Purpose
Code of Conduct	Defines expected behaviour and minimum standards for all employees, contractors, and directors.
Anti-Bribery Policy	Prohibits bribery and corruption in all business dealings.
Anti-discrimination, Bullying and Harassment Policy	Sets standards for respectful workplace behaviour and outlines obligations under relevant legislation.
Whistleblower Policy	Encourages reporting of unethical or illegal conduct and protects whistleblowers from retaliation.

Planned initiatives and actions for FY26

FY26 Initiatives	Actions to be taken
Continue to seek Modern Slavery Act assurances and commitments from our suppliers	AgTrade continues to engage and communicate with its suppliers where appropriate. Several of our financially significant suppliers themselves register Modern Slavery Statements in Australia or their equivalent regulator overseas.
Add a modern slavery clause into supplier contracts	Continuous improvement: This is a permanent standing action item to be considered as contracts come up for renewal.
All team members trained on modern slavery risks	Modern Slavery e-learning module now part of mandatory training and included within the on-boarding process of new staff. Existing staff are required to complete an annual refresher training course on modern slavery risk.
Develop and set key performance indicators	Scorecards to be set for business leaders to measure the effectiveness of our actions, with the need to assess and address modern slavery risk.
Develop a formalised review and implementation of initiatives	Develop a formalised Modern Slavery framework document to manage and monitor progress and outcomes from the identified initiatives.

Criteria 5: Describe how the reporting entity assesses the effectiveness of these actions

AgTrade's Board understands the importance of proactive measures to ensure good governance. We will continue to drive engagement with suppliers to gain higher levels of visibility within our supply chains.

AgTrade's Board maintains oversight of modern slavery risk management as part of our governance framework. Effectiveness is assessed through risk management reviews, policy audits, supplier engagement, Board reporting, site visits, and staff feedback.

We also monitor our compliance with our overseas workforce obligations, in partnership with our payroll and tax advisory teams located in each jurisdiction.

Criteria 6: Describe the process of consultation with any entities the reporting entity owns or controls

All controlled AgTrade entities are overseen by the same executive leadership team, who were fully consulted during the preparation of this Statement. The Statement has been approved by the Board of AgTrade International Pty Ltd, to which all majority-controlled subsidiaries ultimately report.

Criteria 7: Provide any other relevant information**Our Commitment**

We acknowledge that full transparency across global supply chains is challenging, and that addressing modern slavery requires sustained effort. AgTrade remains committed to continuous improvement, collaboration, and responsible business practices.

While progress has been made in FY25, we will continue to strengthen our actions and governance throughout FY26 and beyond.

This annual Modern Slavery Act Statement made pursuant to the Modern Slavery Act (2018) was approved by the Board of AgTrade International Pty Ltd [acting as a higher entity under section 14(2)(d)(ii)] on behalf of all AgTrade Group members].

Signed in accordance with a resolution of Directors.



Justin Slaughter
Managing Director and Chief Executive Officer

20 November 2025

