

Modern Slavery Statement

2023



LINDSAY AUSTRALIA
LIMITED

Contents

01. INTRODUCTION	2
ACKNOWLEDGEMENT OF COUNTRY	
NOTE FROM OUR CEO	
ABOUT THIS STATEMENT	
02. ABOUT LINDSAY AUSTRALIA	3
OUR OPERATIONS	
THE LINDSAY WAY	
OUR GOVERNANCE	
OUR WORKFORCE	
OUR SUPPLY CHAIN	
03. UNDERSTANDING OUR MODERN SLAVERY RISKS	7
OUR APPROACH	
GAINING INSIGHT INTO OUR SUPPLY CHAIN	
OUR KEY RISKS	
EMERGING RISKS	
04. ADDRESSING OUR MODERN SLAVERY RISKS	13
ORGANISATIONAL STRATEGY	
GOVERNANCE	
ETHICAL RECRUITMENT	
CAPABILITY & AWARENESS	
RESPONSIBLE SOURCING	
GRIEVANCE AND REMEDIATION	
STAKEHOLDER ENGAGEMENT & COLLABORATION	
05. MEASURING OUR EFFECTIVENESS	18
06. CONCLUSION	20



ACKNOWLEDGEMENT OF COUNTRY

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.

Introduction

A NOTE FROM OUR CEO

Our 2023 Modern Slavery Statement outlines our continued commitment to upholding human rights and addressing modern slavery across our own operations and broader supply chain. We are committed to ensuring Lindsay Australia does not cause or contribute to modern slavery in any way.

To uphold this commitment, we are continuing to improve our governance and modern slavery risk identification systems and processes. In doing this, we aim to have a positive impact in Australia where we operate, and globally in locations where our supply chain extends; for the good of our people, our planet and future generations.

We understand the success of our reputation and business relies on our continued commitment to ethical practices, transparency, and mutual respect. This reputation is built on tangible actions, guided by values that dictate how our business operations are managed. Central to the “Lindsay Way” is a diligent focus on improving the safety and well-being of the workforce, ensuring the protection, and promotion of human rights across facilities, transport, and our entire supply chain.

Our 2023 Modern Slavery Statement reaffirms our commitment to understanding modern slavery and taking steps to actively eradicating it. The document outlines progress in supplier engagement and provides an update on our three-year roadmap which details our actions towards mitigating the risks of modern slavery within our business.

Our aim is to increase transparency and awareness across our own operations and our broader supply chain, to ensure that Lindsay continues to be a fair, safe and inclusive place to work.



Clay McDonald
Chief Executive Officer

ABOUT THIS STATEMENT

Lindsay Australia Limited ACN 061 642 733 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 2023.

All references to our, we, us, the Company, the Group, Lindsay Australia 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 2023 unless otherwise stated. All monetary values are listed in Australian dollars (A\$) unless otherwise stated.

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

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.

Lindsay Australia welcomes feedback to maintain our high standards of conduct. If you have concerns about modern slavery or human rights issues in our operations or supply chain, please contact us. Your voice matters.

All information reported or disclosed via Stopline will be treated confidentially and sensitively.

By Phone:
1300 30 45 50

Online reporting form at:
<https://lindsayaustralia@stoplinereport.com/>

By Mail:
Lindsay Australia Limited
c/o Stopline, Locked Bag 8,
Hawthorn VIC 3122

About Lindsay Australia

OUR OPERATIONS

Established in 1953 by brothers Tom and Peter Lindsay, Lindsay Australia has grown to be a leading name in transport and logistics in Australia. The business has come a long way from its early days of carrying local fruit and vegetables to the trains in Coffs Harbour. We were one of the first transporters in Australia to use refrigerated trailers, and have since evolved to become a fully integrated transport, logistics, and rural supply company servicing customers in the food-processing, food services, rural and horticultural sectors.

Lindsay Australia is now publicly listed on the Australian Securities Exchange (ASX: LAU), and our corporate group encompasses Lindsay Transport, Lindsay Rural, and Lindsay Fresh Logistics. Post the reporting period, Lindsay Australia acquired WB Hunter, a rural merchandising business based in regional Victoria.

Figure 1. Lindsay operations map.



Lindsay Transport

Providing end-to-end transportation services, including linehaul, dry and general freight, refrigerated chiller freight, as well as local pick-ups and deliveries. Lindsay Transport provides multi-modal optionality offering both road and rail services.

Lindsay Rural

Providing an extensive range of agricultural products including packaging, fertilisers, chemicals, and irrigation equipment.

Lindsay Fresh Logistics

Providing unloading, cross-docking, storage, ripening, fumigation, and import/export services.

2,700
company owned assets

2.4 mil.+
tonnes of freight delivered annually

1,800
customers along Australia’s east coast

21
branches situated across Australia

1,800+
farmers supplied

20
locations serviced

\$10mil.
revenue

100+
logistics clients supplied

THE LINDSAY WAY

The “Lindsay Way” mantra 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 to build a sustainable business for the future. Our values underpin how we manage our business including our approach to addressing modern slavery.



SAFETY ALWAYS

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



PEOPLE FOCUSED

Development and support of current and future employees.



VALUE FAMILY

Recognising the importance and value of family life.



COMMUNITY SUPPORTIVE

Involved and supportive of the local communities.



CUSTOMER AND SUPPLIER ORIENTED

Maintain and improve high level of service to customers and suppliers.



INDUSTRY INNOVATORS

Constantly challenging ourselves to provide and develop new innovations.

OUR GOVERNANCE

At Lindsay Australia, we recognise our impact is greatest when our whole team understand their role and has the opportunity to contribute.

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

Figure 2. Lindsay Australia Limited Modern Slavery Governance Structure.



OUR WORKFORCE

Lindsay Australia relies on the strength of our workforce, which comprises both direct employees and indirect workers – as categorised and defined below.

Direct labour

1,650

1,220 Permanent Employees

430 Casual Employees

33 Sites

Indirect labour

350

210 Linehaul Drivers

135 Pick-up and Delivery (PUD) Drivers

5 Offshore Contractors

HIRED LABOUR

LAL contracts a proportion of vehicle operators through labour hire firms who are engaged on a per trip basis.

SUB-CONTRACTORS

LAL engages directly with subcontractors who provide both the labour and vehicles to complete surplus orders.

CONTRACTORS

Diversified services are also provided on a contract basis ad-hoc, including mechanics, cleaners, security, etc.

All figures on this page are representative of Lindsay Australia at 30 June, 2023

OUR SUPPLY CHAIN

Lindsay Australia’s supply chain is a complex network encompassing a wide range of stakeholders and activities providing the labour and material required for our business to operate.

While we work with a small profile of international suppliers, 99% of our suppliers are based here in Australia. We recognise that while our procurement choices may be made with a local distributor, these suppliers may purchase thousands of products and services on our behalf from sub-suppliers in an extended, largely opaque, complex global supply chain.

FY23 Supplier Snapshot

2,758
suppliers

\$603 mil.
total spend

99%
Australian-based suppliers

90+
categories across goods and services



Business unit

Lindsay Transport

Transport, logistics, warehousing, cold chain

Key supply chains

- Fresh food, horticulture/agricultural related products
- Refrigerated products, including ready to eat meals, juice, dairy products etc
- Fleet and equipment
- Road and rail transport subcontracting
- Tyres
- Fuel and lubricants
- Labour hire
- Equipment maintenance, spare parts and servicing

Lindsay Rural

Rural supplies

- Fertilisers
- Chemicals
- Packaging
- Nutrients

Lindsay Fresh Logistics

Import and export related services

- Fresh food, horticulture/agricultural related products
- Air and sea ports
- Road transport subcontracting
- Fumigation and ripening input products

Head office/ operations

IT services, property development initiatives, property maintenance

- 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

Understanding our modern slavery risks

OUR APPROACH

At Lindsay Australia, we recognise modern slavery as conduct where offenders use coercion, threats or deception to exploit victims and undermine or take away their freedom¹.

It can include human trafficking, slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, forced marriage, and the worst forms of child labour.

At Lindsay Australia, we certainly do not underestimate the impact of modern slavery, nor its prevalence globally and close to home – in fact, according to the Walk Free Foundation’s Global Slavery Index, 41,000 Australians are believed to be victims of modern slavery.

When identifying modern slavery risk that may be relevant to our business, we refer to the United Nations’ ‘Guiding Principles on Business and Human Rights’ (UNGPs). These principles set out a three-part continuum showing how businesses can be involved in adverse human rights impacts, including modern slavery.

The graphic to the right shows how we have mapped our activities across this continuum, an exercise we undertook in FY22 and will aim to repeat every three years.

¹This is consistent with the definition of modern slavery used in the Australian Government’s Official Guidance about the Modern Slavery Act.

Cause

A business may cause modern slavery (or other human rights harm) where its actions or operations directly result in modern slavery practices.

Cause

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

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

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.

Contribute

A business may contribute where its actions or omissions facilitate or incentivise modern slavery.

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.



The assessment is based on **risk to people**, and assesses:

Geographic risk
- country level



Product and service risk
- child and forced labour



Industry risk



GAINING INSIGHT INTO OUR SUPPLY CHAINS

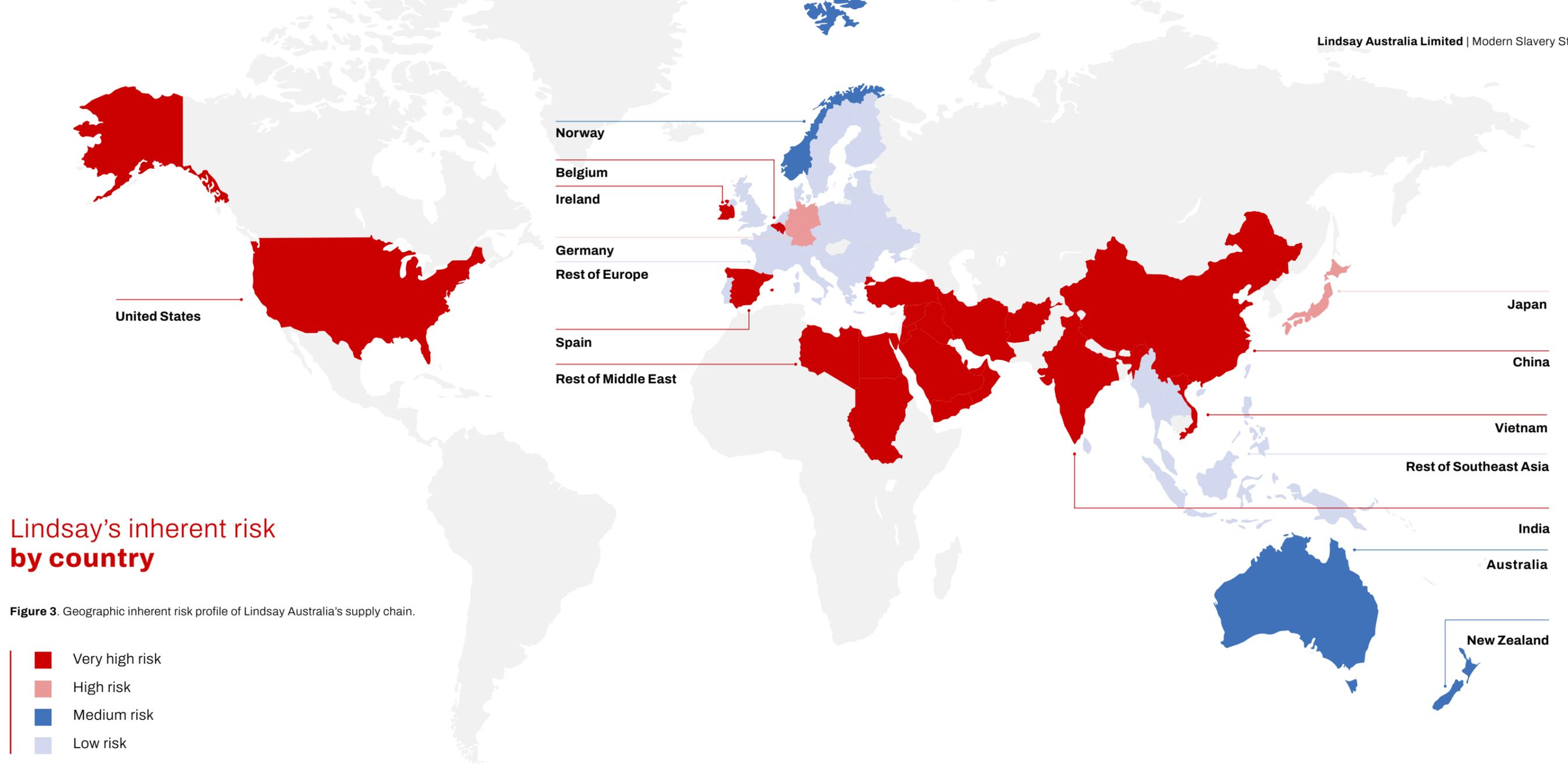
In FY23, we conducted a Social Life-Cycle Assessment (S-LCA) analysis of the Group’s spend data. This is a methodology that screens our spend data against global databases and a literature review - including the Social Hotspot Database, Global Slavery Index.

The analysis ranks our procurement categories according to inherent modern slavery risk, as well as by spend, to summarise the hotspots and their drivers.

This approach enables us to take targeted actions to mitigate modern slavery risks.

The S-LCA helped us to understand and visualise geographic risk factors within our supply chains and will assist us making better and more informed decisions around our supply chains into the future.





Lindsay's inherent risk by country

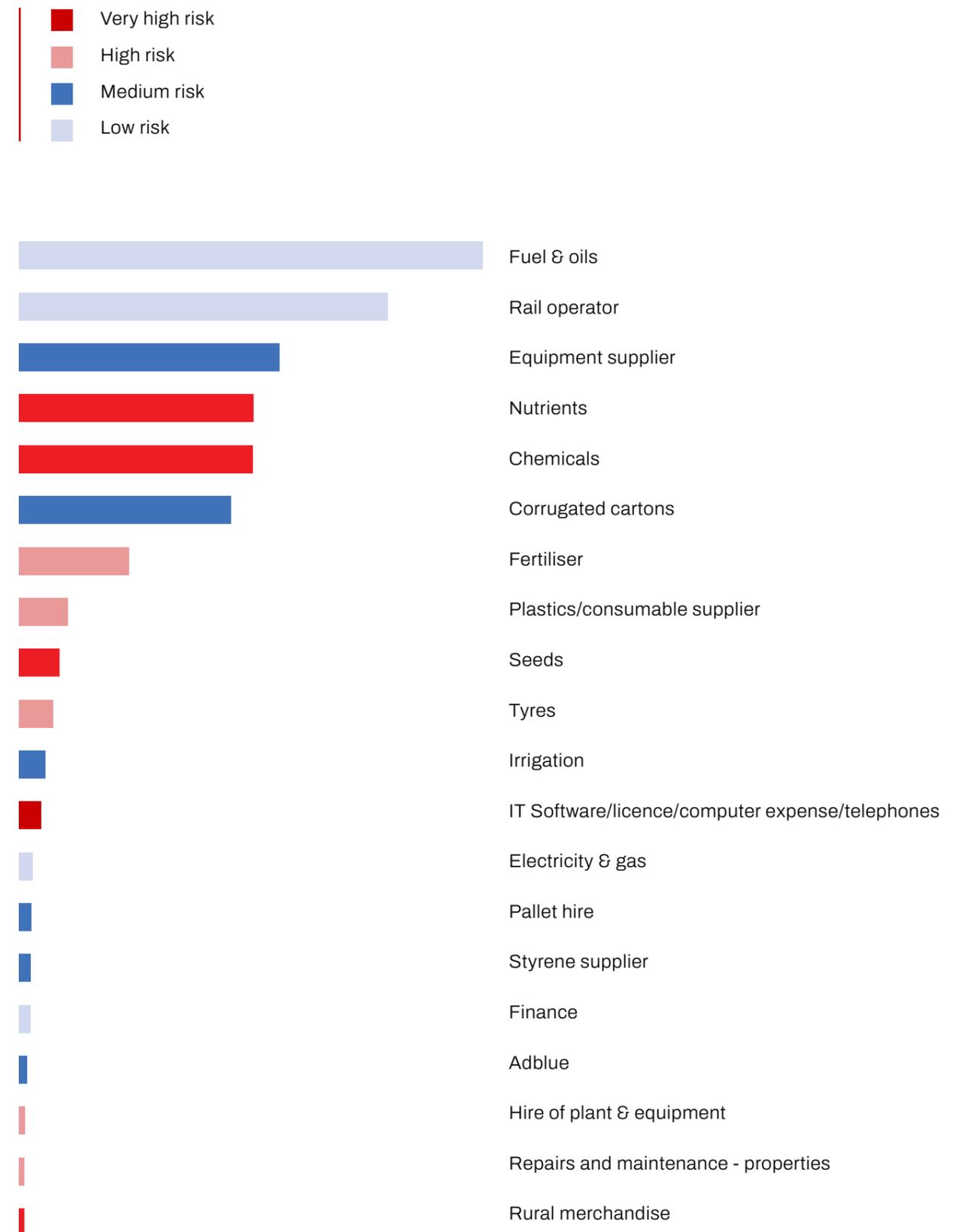
Figure 3. Geographic inherent risk profile of Lindsay Australia's supply chain.

- Very high risk
- High risk
- Medium risk
- Low risk

<p>Australia</p> <ul style="list-style-type: none"> Accounting and audit fees Adblue Adhesives Advertising Animal health ASX fees Automation Bank charges Blending services Builder Cartons Chemicals Cleaning Commercial Commission Construction WIP Consultancy fees 	<ul style="list-style-type: none"> Consumables Corrugated cartons Courier charges Directors fees Donations Donations & sponsorships Electrical supplier Electricity & gas Engineering Entertainment Equipment supplier Fertiliser Finance Fines - Linehaul Forklifts Freehold Improvements - at cost 	<ul style="list-style-type: none"> Freight Claims Fuels & oils Hire of plant & equipment Inspector for import/exports Insurance Insurance claims Insurance recovery Irrigation IT software/licences/computer expenses/telephones Knife suppliers Legal costs Load restrains Loan - Lindsay Fresh Logistics Pty Ltd 	<ul style="list-style-type: none"> Loan - Lindsay Transport Pty Ltd Merger and acquisition costs Methly Bromide Nutrients Occupational health and safety Oil & lubricants Expenses - VO Other products Pallet hire Permits & licenses Pest management Plant and equipment - owned Plastics/consumable supplier 	<ul style="list-style-type: none"> Postage Prepayments - other Printing & stationery Rail operator Rates & taxes Registrations Relocation expenses Rent Repairs & maintenance Repairs and maintenance - Properties Rural merchandise Safety products Security Seeds Shareholder costs 	<ul style="list-style-type: none"> Signwriting Spray equipment Staff advances Staff amenities Staff recruitment Staff training Store float (cash) Styrene supplier Subcontractors/logistics provider Subscriptions Sundry clearing Temporary/3rd Party hire staff Timber Tolls Transport services Travel & accomodation 	<ul style="list-style-type: none"> Uniforms Unloaders Vehicle monitoring Fees Warehouse storage costs Waste removal Weigh bridges Wharf fees Wire supplier Workers compensation 	<ul style="list-style-type: none"> Consumables Container supplier Equipment supplier Hire of Plant & equipment IT software/licences/computer expenses/telephones Nutrients Occupational health and safety Plastics/consumable supplier Printing & stationery Refrigeration supplier Repairs & 	<ul style="list-style-type: none"> maintenance Repairs and maintenance - properties Safety products Uniforms 	<ul style="list-style-type: none"> Japan Chemicals Equipment supplier Repairs & maintenance Tyres 	<ul style="list-style-type: none"> Rest of Southeast Asia IT software/licences/computer expenses/telephones Nutrients Plastics/consumable supplier Printing & stationery Fertiliser Nutrients 	<ul style="list-style-type: none"> equipment IT software/licences/computer expenses/telephones Nutrients Oil & lubricants Expenses - VO Plant and equipment - owned Repairs & maintenance Vehicle monitoring fees 	<ul style="list-style-type: none"> New Zealand Steel tubes 	<ul style="list-style-type: none"> Norway Nutrients Adblue Commercial Equipment supplier Repairs & maintenance Repairs and maintenance - properties 	<ul style="list-style-type: none"> RoW Middle East Fertiliser Nutrients 	<ul style="list-style-type: none"> Spain Nutrients 	<ul style="list-style-type: none"> Vietnam Plastics/consumable supplier 	<ul style="list-style-type: none"> Germany Chemicals Irrigation 	<ul style="list-style-type: none"> India Chemicals Irrigation 	<ul style="list-style-type: none"> Ireland Equipment supplier Repairs & maintenance 	<ul style="list-style-type: none"> Israel Nutrients
--	---	---	---	--	---	---	--	--	---	---	---	---	---	---	---	--	---	---	---	--

Lindsay's inherent risk by spend

Figure 4. Top 20 spend categories and their inherent modern slavery risk.



OUR KEY RISKS

Through our risk mapping process, we have identified four key risk areas that intersect with our operations or supply chain.

1

Vulnerable communities

What's the risk?

Tasks such as cleaning, security, driving and logistics heavily depend on a labour force with low-wage skills, often engaged in temporary and irregular employment, which leads to a higher risk of exploitative practices.

Additionally, the prevalence of migrant workers within this sector amplifies the susceptibility to issues like debt bondage and visa exploitation.

How is it relevant to us?

Indirect labour providing lower-skilled services.

Our use of outsourced labour obtained through labour hire agencies reduces our ability to monitor the payment and contractual arrangements established by the labour provider.

This extends to LAL's use of contracted labour for diversified service support, including security and cleaning.

2

High risk geographies

What's the risk?

Service providers located in high-risk offshore locations have greater exposure to modern slavery risks, which can be attributed to factors like poverty, displacement, a lack of effective legal protections, or the failure of the state to safeguard human rights.

These business associations also heighten the chances of direct involvement in forced labour within the providers' supply chains, including roles like cleaners and security personnel.

How is it relevant to us?

High-risk offshore service provider.

LAL currently has formed business relationships with one offshore service provider and has measures in place to mitigate risks associated with this relationship. However, we are aware of the risks associated with the provider's supply chain.

3

High risk procurement categories

What's the risk?

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

How is it relevant to us?

High-risk products with sub-tier 1 risks.

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

- 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).
- 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).
- Chemical based products (the extraction of minerals and metals used in chemical production can involve hazardous working conditions and exploitation of labour, particularly in regions with weak labour laws and enforcement).

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

4

High risk business models

What's the risk?

The agricultural and horticultural sectors experience fluctuations in workforce needs due to seasonal demands for low-skilled tasks. To maintain profitability and manage labour costs effectively, 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, increase the risk of exploitative activities.

How is it relevant to us?

Transportation of risk products and sale of farm inputs to high risk farms.

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

As a provider of rural merchandise (packaging, fertiliser, nutrients, chemicals) modern slavery risks may be present at the farms and customers we supply. Our staff have the opportunity to identify risk factors for modern slavery at the point of sale or when conducting site visits.

EMERGING RISKS

Inflationary pressures due to geopolitical tensions

The unprecedented war in Ukraine resulted in economic sanctions, which have inflated the international benchmark cost of crude oil and increased Australian fuel costs. LAL continues to scan for geopolitical conflicts that may have ramifications for Lindsay's supply chain, be it through rising oil barrel prices (as a considerable diesel consumer with price sensitivity in a competitive market), supply chain bottlenecks of imported goods (Lindsay Rural sources extensive volumes of imported goods) or even volatile building material costs and availability (with multiple infrastructure projects underway that are time sensitive).

Skilled labour availability

Lindsay is experiencing a skilled labour shortage leading to increased use of front line migrant workers and competing markets pushing labour rates up (the re-emergence of the mining boom/FIFO lifestyle and high demand for logistics providers).

Weather changes, extreme weather within Australia

Australia has experienced an increase in heat extremes, sea levels rising and a growing number of days in drought due to human-induced climate change. Intensifying bushfire seasons, heatwaves and floods, on the back of El Niño weather patterns of FY23, have resulted in more volatile weather that has resulted in fluctuations of volumes across several growing regions. As climate change continues to emerge as a critical factor, it will create uncertainty and impact future volumes over the coming years.

The above pressures may increase the likelihood of supply chain pressures and cost targeting which may increase the likelihood of unfair labour related practices.



Addressing our 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 was developed 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, which together 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.

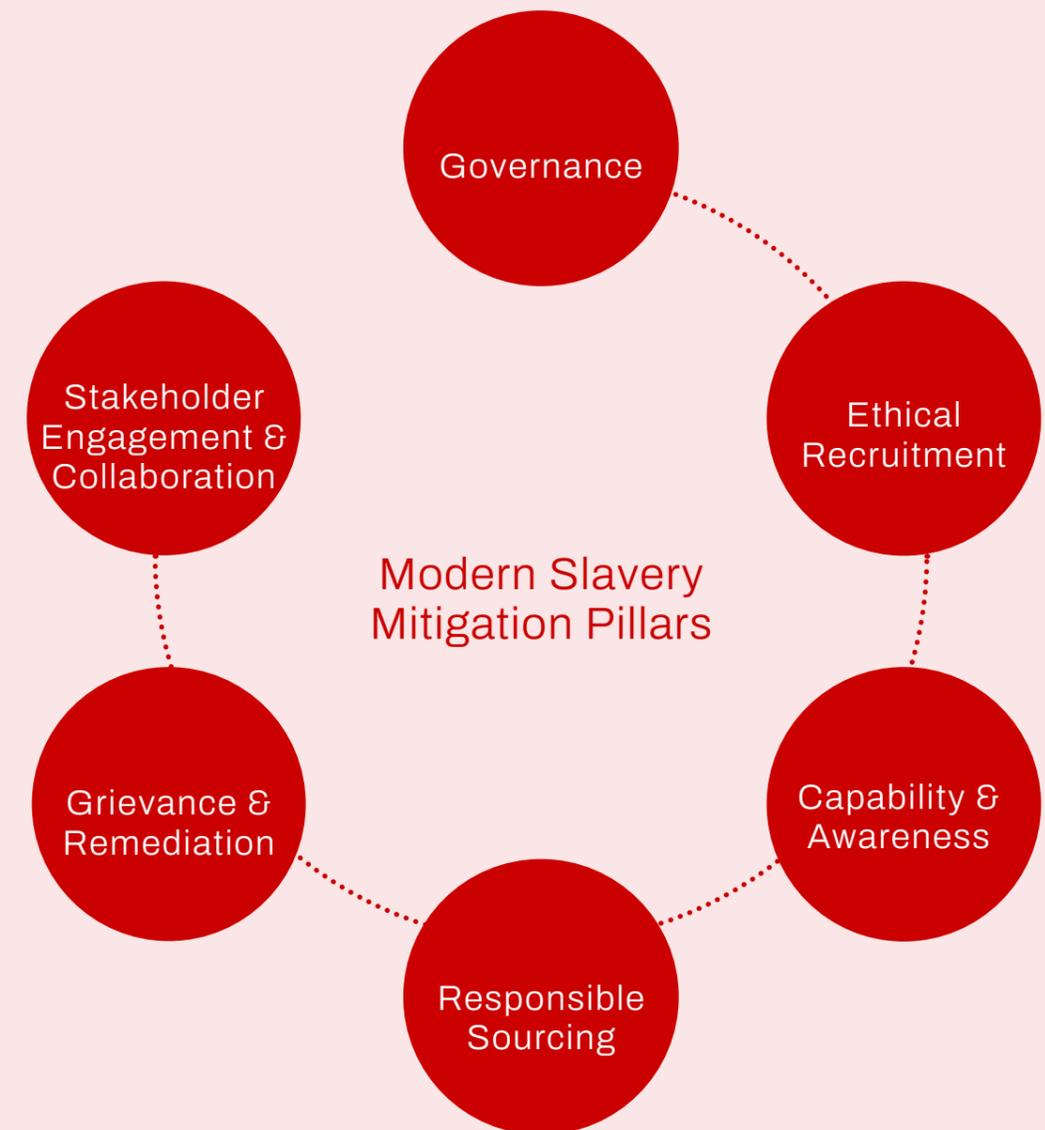


Figure 5. Lindsay Australia Limited Modern Slavery Mitigation Pillars

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

- ✓ Defined roles and responsibilities for escalation of suspected or reported issues
- ✓ Cross-functional accountability and involvement
- ✓ Policy commitment to embed responsible business conduct
- ✓ Systems in place to monitor internal compliance

Cross-functional accountability

LAL's approach will be standardised to align to organisational values, but flexible to the varied risk profiles. By centralising our 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:

- Head of Safety, Risk, Compliance
- 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, payroll, procurement, and commercial teams) 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 our 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. This workforce is often 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 to these workers.

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 Standard Operating Procedures (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 a service level agreement to ensure the provision of EBA rates to drivers and the review of terms and conditions by in-house legal counsel.

We have a clear pre-engagement process in which we request information to ensure subcontractors and labour hire firms meet all industry requirements. During pre-group engagement, rates are reviewed to ensure parity between in-house/external staff.

Steps taken

- ✓ Centralised recruitment processes
- ✓ Assurances of wages and lack of recruitment fees

Next steps

Introducing measures to address labour rights risks related to indirect workers who perform work for LAL remains a key priority for FY24. 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.

A sustainable pricing model will be developed to ensure that LAL does not contribute to the risk of exploitation. The model will include labour costing controls to verify that the contract price is sufficient to satisfy minimum statutory requirements.

We will also take steps to evaluate relationships with contractors and create pre-screening requirements for ongoing relationships.

Future Commitments

- Develop a framework for screening and monitoring labour providers.
- Engage with labour-hire firms to understand whether LAL's business model is contributing to pricing pressures.
- Develop a sustainable pricing model to verify contract prices against statutory requirements.
- 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.

Future commitments

- Build organisational awareness of modern slavery with mandatory training delivered through our online portals.
- Provide modern slavery training to key team members, including the executive team and members of the modern slavery working group.
- Provide targeted training for recruitment and procurement functions.

In FY23, we commenced a phased and targeted approach to modern slavery training. Now, all staff are expected to complete a mandatory online 20-minute modern slavery module through our training portal - delivered by provider Kineo. In FY23, 663 staff members completed this module.

We 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.

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 of working together where possible to take meaningful action.

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.

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.

Steps taken

- ✓ Centralised procurement capability with dedicated oversight of company spend
- ✓ Longstanding and collaborative relationships with key suppliers

Next steps

Category risk screening: A social hotspot assessment of LAL spend and supplier data has been conducted by Edge Impact to identify modern slavery risks at a category level. Following this, we will further assess commodities and services across supply chains with significant risks beyond tier one.

Future commitments

- Social hotspot assessment to identify modern slavery risk at the category level.
- Develop category management plans for high-risk category.
- Augment and improve the utilisation of LAL's Supplier Approval Program to increase onboarding due diligence.
- Build modern slavery-specific model clauses to be incorporated into high-risk categories.
- Develop and implement metrics associated with environmental and social performance for supplier monitoring.
- 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.

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 via 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, Head of Safety, Risk and Compliance, 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.

Steps taken

- ✓ Independent grievance mechanisms established and promoted through communications platforms

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

- Targeted promotion of grievance mechanisms through varied mediums- such as posters, QR codes etc.
- 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.

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.

Steps taken

- ✓ Engaged member within industry bodies
- ✓ Actively participate in social impact initiatives within communities

Next Steps

LAL is in a unique position as a direct connection point with over 2,000 farmers. As the 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

- Map key stakeholder relationships and engage in consultation sessions with identified stakeholders.
- Adopt a process to engage and build awareness with customers, and their workers, in high-risk agricultural sectors.
- Create conditions outlining LAL expectations for customers.
- Identify and leverage opportunities to collaborate with industry peers, non-profit organisations and forums.

Measuring our effectiveness

In FY22, we created a multi-year strategy for advancing the rights of workers and mitigating modern slavery risk in our operations and supply chain.

Execution remains an ongoing commitment, however we have faced challenges in mapping stakeholder relationships and embedding human rights considerations into key procedures. These two activities remain important to us, and our Modern Slavery Working Group will redefine these for progression in FY24.

Measurement of our effectiveness continues to be evaluated against our roadmap and will transition to the measurement of key metrics in the coming reporting periods.

Timeline

Phase 1

January 2023 - June 2023

Phase 2

July 2023 – June 2024

Phase 3

July 2024 – June 2025



MEASURING OUR EFFECTIVENESS

Governance

Action	Timeline	Metrics	Progress
Formalise Modern Slavery Working Group (MSWG) and reporting expectations	Phase 1	Modern Slavery Working Group added to governance structure (action)	Complete
		MSWG submits quarterly reports to the Board (number)	
		Fair representation of divisions and business functions (ratio)	
Augment current policies and processes to include human rights considerations	Phase 1		In Progress

Ethical Recruitment

Action	Timeline	Metrics	Progress
Develop a framework for screening and monitoring labour providers	Phase 2	Develop key criteria and processes for screening labour providers (action)	Incomplete
		100% of current providers are assessed through a screening framework (ongoing percentage)	
		100% of new labour providers are screened (ongoing percentage)	
Engage with labour-hire firms to understand whether LAL's business model is contributing to pricing pressures	Phase 2	100% of current labour-hire firms are provided with an opportunity to give feedback through quarterly meetings (percentage)	Complete
Develop a sustainable pricing model to verify contract price against statutory requirements	Phase 3	Develop a pricing model tool (action)	Incomplete
		100% of relevant staff members are provided with training (percentage)	
		Model is utilised 100% of the time (percentage)	
Targeted auditing of key labour-hire firms	Phase 3	Each labour-hire firm has a spot check audit at least once a year (number)	Incomplete

Capability & Awareness

Action	Timeline	Metrics	Progress
Build organisational awareness of modern slavery through mandatory training through our online portals	Phase 1	100% of staff complete the online Kineo module	Complete
Provide modern slavery awareness training to key team members, including the executive team and members of the modern slavery working group	Phase 1	1x30 minute sessions provided at executive and senior leadership level (annual number) (min 12 members to attend)	Complete
		1x60 minute targeted training session provided to working group members (annual number) (min 12 members to attend)	
Targeted training for recruitment and procurement functions	Phase 2	Internal module (webinar) created to support recruitment and procurement roles specific to new systems	In Progress
		100% of staff engaged in procurement or recruitment complete training module (ongoing percentage)	

Responsible Sourcing

Action	Timeline	Metrics	Progress
Social hotspot assessment to identify modern slavery risk at the category level	Phase 1	Modern slavery risks mapped at category level (action)	Complete
Develop category management plans for high-risk category	Phase 2	Category plan developed for top 5 high-risk categories (number)	In Progress
		Augment and improve the utilisation of LAL's Supplier Approval Program to increase onboarding due diligence	
		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)	
Build modern slavery-specific model clauses to be incorporated for high-risk categories	Phase 2	100% high-risk category contracts contain modern slavery clause	In Progress
Develop and implement metrics associated with environmental and social performance for supplier monitoring	Phase 3		In Progress
Consult procurement specialist to create an overarching responsible sourcing framework	Phase 3		In Progress

Grievance & Remediation

Action	Timeline	Metrics	Progress
Targeted promotion of grievance mechanisms through varied mediums (posters, QR codes etc)	Phase 2	% Increase in the utilisation of grievance mechanism	Complete
		100% of cases investigated within 10 days of receipt	
		100% of serious cases reported to senior management	
Develop a remediation plan specific to modern slavery	Phase 1		In Progress

Stakeholder Engagement & Collaboration

Action	Timeline	Metrics	Progress
Map key stakeholder relationships	Phase 1		In Progress
Engage in consultation sessions with identified stakeholders	Phase 2	Number of stakeholders engaged (number)	Incomplete
		Number of types of stakeholders (number)	
Adopt a process to engage and build awareness with customers (and their workers) in high-risk agricultural and horticultural sectors	Phase 3		Incomplete
Create conditions outlining LAL expectations for customers	Phase 2	100% of high-risk customers receive modern slavery conditions and expectations	Incomplete
Identify and leverage opportunities to collaborate with industry peers, non-profit organisations and forums	Phase 3	External participation in at least one regular external forum	Incomplete

Conclusion

FY23 was a year of considerable maturing for Lindsay as we advanced our progress against our roadmap. We recognise that we are only part way through our journey.



As with addressing all risks, our approach will remain dynamic. Built initiative by initiative, we will remain 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

This Statement is made pursuant to section 13(1) of the Modern Slavery Act (Commonwealth) 2018. It constitutes the joint statement of the Lindsay Australia Limited and covers the reporting period 1 July 2022 to 30 June 2023. The Statement was prepared in consultation with our controlled entities (including the reporting entities).

The Statement has been reviewed and approved by the Lindsay Australia Board on behalf of itself and each of the reporting entities on 20 December 2023.



Ian Williams

Chair of the Board of Directors
Lindsay Australia Ltd



LINDSAY AUSTRALIA
LIMITED

152 Postle Street
Acacia Ridge QLD 4110

Locked Bag 2004
Archerfield Qld 4108

P: 07 3240 4900
W: [lindsayaustralia.com.au](https://www.lindsayaustralia.com.au)