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Modern Slavery Statement

This Modern Slavery Statement is made by Milne Agrigroup Pty Ltd (**Milne**), ACN 008 919 579, in accordance with the Australian Modern Slavery Act 2018 (Cth) for the year ending 30 June 2020 and describes what Milne has done to minimise the risk of modern slavery occurring in the operations or supply chains.

Introduction

This is the first Modern Slavery Statement for Milne Agrigroup Pty Ltd.

The purpose of this statement is to outline what Milne Agrigroup is doing to minimise the risk of Modern Slavery in our operations and supply chains. Milne is committed to working with our stakeholders, suppliers, other businesses and the broader community to contribute to the global effort to eradicate modern slavery practices from all communities and countries. We know that the problem of modern slavery is a growing global concern and we are committed to an active and agile response to risks that we identify across all aspects of our business.

We recognise Modern Slavery is behaviour that exploits others and includes, human trafficking, debt bondage, forced labour, deceptive recruiting for labour or services, the sale of children, discriminatory employment practices and forced marriage. Modern Slavery occurs in a wide range of industries and businesses across the world and including Australia and certain groups in the community, like migrants, women and children are particularly at risk of such practices. In this policy we use the term Modern Slavery to encompass all the practices to which the Modern Slavery Act refers.

In Australia, the Commonwealth Criminal Code makes it a criminal offence to engage in slavery or slavery like practices.

We are committed to operating responsibly and maintaining our ethical standards across all operations in our group. Our company has a zero tolerance approach to Modern Slavery practices in our businesses and supply chain and we have consulted with stakeholders, suppliers and other businesses to develop our response to modern slavery and the socioeconomic conditions that create it.

Our Business

Milne is a Western Australian fully integrated, family owned and operated agribusiness based in Western Australia. We employ staff at our sites in metropolitan Perth and regional Western Australia. Our operations include free range farming of chickens and pigs, meat processing, and the production of animal feed (milling). We have developed and adhere to strict guidelines through all stages of production to ensure high welfare, free range premium quality from paddock to plate. Our brands include Mt Barker Free Range Farms, Milne Feeds and Plantagenet Pork. We operate out of the Great Southern Region and sites in Rockingham and Welshpool in Western Australia. We supply our products to consumers both in Australia and internationally.

Milne Agrigroup Operations and Supply Chain and Risk of Modern Slavery

Operations

We are a primary producer of free range and high welfare chicken and pork products, some red meat products, and animal feed all of which is supplied directly to consumers as well as to resellers like local butcher shops and supermarkets. Being a primary producer means that we directly employ people to work at our premises where our product is manufactured, processed, and packed. We have review of our operations identified that there are areas where there are risks of adverse behaviour and modern slavery but for our operations the risk is low. We consulted with stakeholders at all sites with a goal of ensuring that our supervisors and managers contribute to creating a working community and environment that is ethical, lawful and where an individual's human rights and animals welfare and care is our highest priority.

The majority of our workforce are covered by an industrial award that provide minimum pay and entitlements (together with obligations set out in the National Employment Standards). We conduct desktop reviews for compliance with the standards set out in the relevant legislation. We also conduct these reviews for our employees who are on individually negotiated agreements. We comply with the consultation provisions of these awards and recognise the right of all employees to negotiate collectively. We prioritise equality, fair pay, and safety and have a strong commitment at every level of the organisation to the same.

Suppliers

For some of our products we use third party suppliers. For example, we source spices and ingredients for sauces for our ready to eat and ready to cook ranges for Mt Barker Chicken. Our feed milling business purchases grain and other inputs from farmers across the state. Our operations also acquire goods that we do not sell such as IT equipment, plant and machinery used in production and PPE like gloves and aprons. In addition, we also contract with other third-party suppliers for the provision of services for our logistics, transport and some IT services. We also source some products from other countries like India, China and Malaysia.

The production of all goods and services are at risk of having practices of Modern Slavery in their supply chain and we have identified that there are some areas that may be more at risk than others. For example, third party suppliers of contract labour in Australia, in our industry, has seen some examples of modern slavery practices in recent history. Additionally, it is recognised that some International countries are at a higher risk of having modern slavery practices in their supply chain.

In summary, Milne Agrigroup sources products from a range of countries with the largest volume of our products being produced and manufactured in Australia and other, much smaller volumes coming from overseas including, China, India and Malaysia. We are aware that products sourced from some countries entail a higher risk of modern slavery practices in the supply chain. We aim to do business with suppliers who have the same values as Milne including animal welfare, ethical business standards and human rights

Actions Taken to address Risk

Milne Agrigroup has taken steps to address the risk of modern slavery occurring in Operations and Supply Chain, including:

- Developing and implementing Policy on the prevention of Modern Slavery.
- Reviewing our Whistle Blower Policy.
- We reviewed our Employment Policy and Procedure, identified areas where we could improve transparency of employment (and reduce the risk of adverse actions) and implemented those procedural changes.
- We reviewed and amended our procedure for the use of contract labour with our amendments aimed at reducing and managing the risk posed by the use of contract labour.
- We reviewed our Grievance Policy and reporting processes.
- We implemented a reporting line that includes a confidential reporting mechanism for use by stakeholders, employees, contractors and suppliers.
- We continued our review processes of renumeration rate and terms of employment for our employees as well as an external audit process for any people working on our site through a third-party labour supply company.
- We have an ongoing process of assessment of our third-party supplier which is linked to our quality and purchasing systems.
- We have amended our purchasing policies and procedures to include questions to assist assessment new supplier risk and require new suppliers to provide information with respect to compliance with modern slavery prevention.
- we have commenced internal training in our Occupational Health and Safety teams, Human Resources and Purchasing teams in identifying and taking steps to prevent modern slavery practices. Assessment of effectiveness of this measure is proportional to the amount of team members who are trained.

Remediation

We are committed to work with our suppliers, stakeholders, employees, representative bodies, and any other relevant party to ensure that appropriate steps are taken to remediate where required.

Future Actions

Milne is committed to continuous improvement in our strategies to identify and mitigate modern slavery and ethical sourcing risks. Our planned focus in the next 12 months is:

- further review and assessment of our suppliers and the broader supply chain risks;
- Broaden our focus and roll training out to more teams, beyond purchasing and Human Resources and Occupational Health and Safety. Our aim is to ensure that all key team members understand what Modern Slavery is, how to recognise the risks and what we can do about it.
- Review and assess and continue to monitor and report on grievances and feedback received. Continue to take reporting on a case by case basis.
- Continue to monitor, review, and assess effectiveness of above measures and work to identify areas where we can implement changes in our Australian operations to reduce the risk of adverse acts in our operations and supply chain.
- Maintain and continue the progress we have made over the 2019 2020 reporting period.

This statement has been approved by the principle governing body of Milne Agrigroup Pty

Ltd

Graham Spencer Laitt Managing Director and Chief Executive Officer March 2021