



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) (**the Act**) for the year ending 30 June 2023 and describes what Milne has done to minimise the risk of modern slavery occurring in its operations and supply chains. In this reporting period, when preparing our Modern Slavery Statement, we consulted with Milne's related companies; discussing the reporting requirements the steps that Milne takes to comply with the requirements of the act and information and updates relating to the same. This statement covers Milne and its related entities, including, Dowford Investments Pty Ltd (ACN 093 388 446).

Introduction

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

The purpose of this statement is to update and set out 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 we will work with all our stakeholders to promote a community that has an effective and meaningful 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 over 500 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 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 in regional and metropolitan Western Australia. We supply our products domestically and internationally.

Milne Agrigroup Operations and Supply Chain Risk

Operations

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 reviewed our operations and identified that there are areas where there are risks of adverse behaviour and modern slavery but the risk is low. We consulted with relevant managers at our 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 industrial awards that provide minimum pay and entitlements (together with obligations set out in the National Employment Standards). We conduct desktop reviews and internal audits for compliance with the standards set out in the relevant legislation. We also conduct the same types of reviews for our employees who are on individually negotiated agreements (using the better off overall test). We work to 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

Milne products are Australian grown and made. However, for some of our products there are components where we need to 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 use goods that we do not sell, such as IT equipment, plant and machinery used in production and PPE like gloves and aprons. In the past two years we have acquired PPE to assist with our response to the ongoing risk of Covid 19 in the workplace. We also contract with other third-party suppliers for the provision of services for some logistics and transport and limited IT services.

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 Australian Agriculture and the Cleaning Industry have both seen some examples of modern slavery practices in recent history. We understand that some international countries where some of our suppliers are located do not have modern slavery law or governance requirements. They are also at a higher risk of having modern slavery practices in their 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. To support our goals, we have developed internal processes aimed at reducing the risk of modern slavery in our supply chain. These processes are implemented by our purchasing team and measured and reviewed by our Quality Assurance team in partnership with our Legal and Human Resources team.

In this reporting period we worked on developing some performance indicators that can be used to assess our performance of these processes and those indicators include goals as to the assessment of third-party suppliers, number of contracts including Modern Slavery in terms, conducting reviews and reporting of the same. We aim to continually improve these metrics to increase our reporting and accountability.

We employ a proportion of staff who are working in Australia pursuant to rights granted to them under a visa (like a working holiday visa or restricted hours pursuant to a student visa). We engage directly with those employees and when required we obtain support from an expert who is a registered migration agent to support us in any related matters.

The provision of labour under contract or labour hire arrangements with Milne is done pursuant to Australian law, governed by contract enforceable in Australian jurisdiction and in recent years we have developed and worked on continuously improving our internal systems and processes to minimise the risk of modern slavery in this labour supply chain as we recognise it as a key risk area of modern slavery in Australia. In this reporting period the review of the measures prompted the implementation of additional consultation with our supply partners with respect to the risk of modern slavery and the steps and information we require to address and mitigate those risks in the supply of staff to our sites.

Actions Taken to address Risk

Policies and Procedures

Milne Agrigroup has in place policies and procedures to support our fundamental commitment to ethical and humane production. Including the following actions, for the 2022/2023 reporting period:

- Active review and monitoring of our dedicated reporting line that includes a confidential reporting mechanism reviewing staff knowledge and information guidelines about the confidential reporting mechanism and increasing publications to increase staff awareness. Developing and launching anonymous online form for easier access and rolling out the placement of physical reporting boxes for those who have limited access to internet.
- Ongoing use and compliance with Milne procedure for the hire of contract labour and reviewing all labour supply arrangements for compliance. Consulting and communication with suppliers to work together to reduce and manage the risk posed using contract labour (as described above). Ensure any contractual agreement for the supply of the same is reviewed for compliance with Milne Modern Slavery policy and procedures.
- Continuing and ongoing review process for pay 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.
- ongoing process of assessment of our third-party suppliers (which is linked to our quality and purchasing systems).
- we are continuing internal training in our Occupational Health and Safety teams, Human Resources and Purchasing teams in identifying and taking steps to prevent modern slavery practices.
- We are a member of Sedex
- This reporting period we have completed changes to our supplier/purchasing processes with a view to increasing efficiencies. These changes are the result of a review in the last reporting period.

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:

- Commencing update and review of risk assessment for modern slavery considering recent reporting of incidents of modern slavery in Australia and the world. Ensure broader and related processes are updated where relevant.
- ongoing review and assessment of our suppliers and the broader supply chain risks. Increase our supplier monitoring reporting processes, increase efficiency in the processes.
- Develop bespoke training materials for specific risks in consultation with teams. Our aim is to ensure that all key team members understand what Modern Slavery is, how to recognise the risks in their area of work and what we can do about it.
- Review 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 identify areas where we can implement changes in our Australian operations to reduce the risk of adverse acts in our operations.
- Maintain and continue the progress we have made over the 2022/2023 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
December 2023

