



AMEROPA
AUSTRALIA

FINANCIAL YEAR
2020

Modern Slavery Statement

Ameropa Australia Pty Ltd
ACN 009 504 394

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Ameropa Australia Pty Ltd
ACN 009 504 394 - Modern
Slavery Statement

Introduction

Ameropa Australia Pty Ltd (trading as Impact Fertilisers and Brown's Fertilisers) is committed to corporate social responsibility and to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. This Statement sets out all of the steps and measures we are putting in place to reach this goal.

Jim Mole
Chief Executive Officer



Ameropa Australia Pty Ltd ACN 009 504 394 Modern Slavery Statement

This statement is made under the Modern Slavery Act 2018 (Cth) (Act). It sets out the risks of modern slavery in the operations and supply chain of Ameropa Australia Pty Ltd (ACN 009 504 394) ("Ameropa", "us" or "we"), an entity registered in Tasmania, Australia, and the actions we have taken to address and remediate such risks during that period.

Ameropa is a reporting entity for the purposes of the Act for the financial year 2020 ending on 31 December 2020. It does not control any other entities.

Our Structure, Operations and Supply Chains

Ameropa is a wholly owned subsidiary of Ameropa Trade Holding AG (Ameropa AG); a global business with its head office located in Basel, Switzerland.

Ameropa AG is a privately owned international agribusiness, specialising in the physical global merchandising and distribution of fertiliser, food and feed products. Ameropa distributes fertiliser products within Australia through its brands 'Impact Fertilisers' and 'Brown's Fertilisers'.

Impact Fertilisers

Impact Fertilisers is a wholesale component of the distribution business, which sells its products and services through an extensive dealer network in Eastern Australia. There are nine Impact Fertilisers distribution depots on the mainland of Australia and eight depots in Tasmania, providing a convenient despatch footprint for wholesale customers. Our infrastructure also includes a Single Super Phosphate manufacturing plant in Hobart, Tasmania.

Impact Fertilisers supplies dealers with a wide range of quality fertiliser products that the dealers on-sell to Australian growers. Our products include Urea, Single Super Phosphate, Mono-Ammonium Phosphate, Di-Ammonium Phosphate, Muriate of Potash and Sulphate of Ammonium together with a range of specialty products designed to improve farming productivity even further such as: ZincStar®, and Agromaster®.

Impact Fertilisers offers blending services and can provide product as bulk or bagged, depending on the depot of despatch.

Brown's Fertilisers

Brown's Fertilisers (Brown's) is a retail and fertiliser spreading business. Brown's has been operating in North East Victoria and the South and West Gippsland areas for over 35 years. Brown's has three depots across Gippsland, a depot in North East Victoria and their own fleet of trucks.

Services include: Soil testing and agronomy; Fertiliser and lime spreading; Compost and manure spreading; Fertiliser bins; Bulk and 25kg bags and Bulk cartage.

Ameropa currently has 189 employees, with 37 based at the Melbourne Head Office.

In the 2020 financial year, Ameropa engaged directly with more than 1,200 suppliers from 12 countries. Ameropa's largest category of spend was on fertiliser.

The supply chain of products and services that contribute to our operations include:

- Sourcing raw materials from overseas and shipping those products to Australia;
- Unloading product from ships and storing;
- Wholesale and retail distribution of products;
- Distributing products to customers;
- Manufacturing products; and
- Agronomist and spreading services.

Key Areas of Focus in 2020

Whilst Ameropa has over many years and on a global scale developed a number of policies and processes seeking to protect human rights and reduce the risk of modern slavery in its operations and supply chain, it has placed much emphasis on this area of corporate responsibility since the introduction of the Modern Slavery Act 2018 (Cth). In particular, in financial year 2020 we took the following steps:

1. We developed and issued a Suppliers Code of Conduct. Ameropa is committed to corporate social responsibility. In support of this commitment, we have a set of ethical standards to guide us in our business dealings. In turn, we expect all our suppliers to share the same ethical standards and to commit to meeting these standards. To this end, Ameropa introduced a Supplier Code of Conduct, setting out minimum standards that we expect of our suppliers. Initially this was sent to all new suppliers and is now being shared with all suppliers.
2. To support the Supplier Code of Conduct we developed a due diligence questionnaire to enable us to conduct due diligence investigations on new suppliers where there may be a risk of modern slavery and also sent the due diligence questionnaire to our key suppliers seeking greater transparency of their business supply chain practices. Responses to this questionnaire will assist us to assess and understand the risks of modern slavery practices occurring in our domestic and overseas operations and supply chains.
3. We have started to enhance our contractual clauses in procurement contracts to specifically cover modern slavery risks.
4. We introduced a Modern Slavery Policy.
5. We created and rolled out a compulsory Modern Slavery compliance training module for all of our staff.

Risks of Modern Slavery Practices in our Operations and Supply Chains

Ameropa's operations are run out of Australia using a workforce hired through our in-house human resources team and in conformance with all Australian laws. We therefore perceive that the risk of modern slavery in our direct options (i.e. modern slavery risks that we cause) to be low. We manage our business and commercial relationships closely and therefore also perceive the likelihood of Ameropa directly contributing to modern slavery risks to be low.

However, our supply network is extensive, with supplies sourced from many regions. Ameropa is therefore at risk of being linked to risks of modern slavery through its business relationships with its suppliers. We have outlined the location of some of our key suppliers, the products or services we source from them, and our view of the possible modern slavery risks attached to those arrangements.

| COUNTRY | RISK | EXAMPLE OF PRODUCT/ SERVICE |
|--------------|---|---|
| Argentina | Forced labour | Boron |
| Australia | Migrant labour exploitation | Third party bagging, Transport services |
| China | Forced labour. Fair working conditions | Urea, Rock Phosphate, Ammonium Phosphates, Surveying and Inspections services |
| India | Migrant labour exploitation. Forced labour | FIBC Packaging |
| Indonesia | Migrant labour exploitation. Bonded labour | Urea |
| Malaysia | Forced Labour. Bonded labour. Migrant labour exploitation | Urea |
| Saudi Arabia | Migrant labour exploitation. Forced labour | Urea, Ammonium Phosphates, Sulphur |
| South Korea | Forced labour | Sulphur |
| Taiwan | Forced labour | Sulphate of Potash |
| Togo | Migrant labour exploitation. Forced labour | Rock Phosphate |
| Turkey | Migrant labour exploitation. Forced labour | Sulphur |
| USA | Migrant labour exploitation. Forced labour | Phosphates |

The actions we take to assess and address these risks

There are a number of actions we take to assess and address the risks of modern slavery throughout Ameropa operations and supply chains.

1. Our Policies

Prior to the enactment of the Modern Slavery Act 2018 (Cth), Ameropa had a longstanding set of policies in place, that are regularly reviewed, to assess and address risks of modern slavery. These include our Code of Conduct, our Anti-Bribery and Corruption Policy, Whistleblower Policy and Grievance Resolution policy together with our Modern Slavery Policy (Policies).

These Policies ensure that our team members and suppliers are dedicated to managing social, ethical and environmental issues in a responsible manner and consistent with our values.

At Ameropa, we value education and transparency and each of our employees and suppliers is made aware of the expectation that they will be familiar with and comply with relevant policies.

The Policies will continue to be monitored and updated from time to time to ensure that we approach our social, ethical and environmental responsibilities in an appropriate, contemporaneous and agile manner.

We believe that strong internal policies and systems are a key aspect of ensuring we manage and mitigate the risk of modern slavery in our operations and supply chains.

2. Modern Slavery Focus

Ameropa's executive leadership team (ELT) has adopted a focused approach to modern slavery risks and in addition to the preparation of a Ameropa modern slavery statement, is working to identify and address any modern slavery risks in Ameropa operations and supply chain (i.e. remediate any incidents if and when they arise), to identify means to reduce or mitigate the risk of modern slavery, develop programs, practices and procedures to enhance Ameropa's response to modern slavery, and to operate as a group of "thought leaders" for the organisation on the very real issue of modern slavery in a group that fundamentally deals with farming, packaging and logistics suppliers.

The ELT has raised awareness of modern slavery risks and Ameropa's response to those risks through all areas of the Ameropa business, and this will include developing an employee education and compliance program as outlined in item 4 below.

3. Risk Mapping and Due Diligence

Ameropa conducts due diligence on all of its suppliers before they are introduced to the supply team including the completion of the specifically tailored questionnaire designed to determine the risk of modern slavery in the operations and supply chains of Ameropa's suppliers.

4. Employee Education and Compliance

Ameropa has taken steps to increase employee awareness and engagement regarding modern slavery and has developed a Modern Slavery Policy which is available to all employees on our intranet and through employee education.

Ameropa has employee policies and procedures in place with respect to the hiring of employees, to ensure that slavery, forced labour or human trafficking is not occurring in Ameropa's hiring process or employment relationships.

5. Industry Discussions

Ameropa has an ongoing and active dialogue with a number of its key suppliers and customers as well as Industry groups such as Fertiliser Australia and International Fertilizer Association (IFA) regarding the manner in which the risk of modern slavery can be addressed and reduced.

6. Managing Supplier Contracts

If a supplier is found to be in breach of the terms stipulated in their contract with us, we can suspend or terminate the contract with that supplier. We would take any breach involving a risk to human rights seriously and address it promptly and with regard to the ultimate outcome to reduce or remove the risk altogether.

The Objectives for 2021

The ELT has set out the below objectives that it intends to meet by the end of the 2021 financial year in addressing modern slavery risks.

1. Increasing the Supplier threshold

The ELT will further investigate the modern slavery risks and determine appropriate remediation action.

Remediation action may involve the removal of high-risk modern slavery suppliers to be replaced with suppliers presenting a lower risk of modern slavery in their operations and supply chain.

2. Deep dive into indirect supply chain

As Ameropa's response to modern slavery risks develops and matures, we are proposing to expand our focus to our indirect supply chain.

3. Reporting concerns

To address individual concerns, we have a complaints and grievance procedure. This allows community members and other interested stakeholders, such as our suppliers, to raise issues directly with our local operations managers. We respond to all complaints and grievances and aim to resolve any issue as soon as possible.

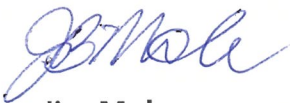
How we assess the effectiveness of the actions we take to address the risks of Modern Slavery

The effectiveness of the measures Ameropa takes to address the risks of modern slavery are assessed by Ameropa through the following means:

1. Responsibility and accountability for Modern Slavery Issues – the ELT acknowledges that it is accountable for addressing modern slavery issues in its operations and supply chain. The General Managers of each business unit are responsible for the management of modern slavery risk within their business unit. General Managers report back through to the ELT in order to assess the effectiveness of actions taken by the organisation.
2. Supply chain mapping and risk assessment has been conducted by members of the ELT and an initial assessment conducted of the risks of modern slavery across Ameropa's operations. The initial assessment has been directed at high value and perceived high-risk suppliers. The current analysis will be used as a benchmark in the future to consider improvements to an organisation's risk profile and to identify areas of improvement to minimise risks.
3. A complaint and grievance policy is available to address modern slavery concerns. Assessments of the number and nature of any complaints and grievances will be conducted to determine the effectiveness of actions taken to address modern slavery risk.
4. The development of a risk assessment process will occur when further actions to assess and address the risks of Modern Slavery are developed.

This statement was approved by the Board of Ameropa.

Signed,



Jim Mole
Director, Ameropa Australia Pty Ltd

