



## **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 2025 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 and consulted on 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, parent company Dowford Investments Pty Ltd (ACN 093 388 446).

## **Introduction**

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

The purpose of this statement is to update and set out what we do 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.

Milne recognises that modern slavery risks are complex, evolving and not always visible. While we take (and have taken) steps to identify and mitigate risks within our operations and supply chains, we acknowledge that some risks may not be fully known or controlled. Transparency about those limitations to our own processes is an important part of responsible risk management and continuous improvement.

Modern Slavery is behaviour that is characterised as serious exploitation, examples of it can be seen in a variety of situations and can be identified where we see the exploitation of others and including, for example, 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, including Australia. Some groups in our community, like migrants, women and children may be 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. We maintain a firm commitment to zero tolerance for inaction when or if a case of modern slavery is identified in our supply chain. Milne through ongoing training, consultation and collaboration will continue to work with all our stakeholders to promote a community response aimed at the eradication of modern slavery and the socioeconomic conditions that create it.

## **Our Organisation and Operations**

Milne is a Western Australian fully integrated, family owned, and operated agribusiness based in Western Australia. We employ staff at 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 (feed milling). We 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**

Oversight of modern slavery risk at Milne sits within our broader risk management and compliance framework (including ethical sourcing). The executive and CEO retain ultimate accountability for modern slavery compliance. Day to day responsibility for implementing risk control sits with senior management, supported by in house counsel, quality, procurement and human resources functions (including payroll and work health and safety). We continue to develop our internal governance arrangements to ensure modern slavery risks are reviewed on a regular and structured basis and that all escalation and reporting pathways are clear where concerns are identified.

### **Operations**

Being a primary producer means that we directly employ people to work at our premises where our product is manufactured, processed, and packed. Our operations are based in Western Australia. Milne modern slavery risk assessment (Operations) identified key areas where, at our operations, there could be a risk of adverse behaviour of the type that could or may lead to a higher risk of modern slavery. In completing the risk assessment we consulted with our recruitment and operations managers and we all worked together to develop policies, procedures and processes that support and contribute to creating a working community and environment that is ethical and lawful and where an individual's human rights and animals welfare and care is our highest priority.

To support these policies, procedures and processes and minimise the risk to operations we:

- (a) Conduct desktop reviews and internal audits for compliance
- (b) Participate in 3<sup>rd</sup> Party audits of our relevant systems (we are a member of Sedex)
- (c) Prioritise consultation and recognise the right of employees to freely associate with trade unions and other employment related organisations as they see fit.

We prioritise equality, fair pay and safety and have a strong commitment at every level of the organisation to the same. Where working at our site is through employment other than direct hire, we conduct annual audits and review the risks to those people (we detail those processes under 'Suppliers' below)

### **Suppliers**

All of Milne products are Australian grown and made. However, a portion of our products also contain ingredients of packaging and that may be sourced from a third-party supplier. For example, we source spices and ingredients for sauces for our ready to eat and ready to cook ranges for Mt Barker Chicken. 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. We also contract with other third-party suppliers for the provision of services for some logistics and transport.

The production of all goods and services are at risk of having practices of Modern Slavery in their supply chain regardless of whether they are located in Australia or overseas although, some locations and industries are at higher risk than others. Some countries are yet to implement or have modern slavery law or governance requirements. Those countries may not take the risk management steps to manage the risk of modern slavery and as a result may have a higher risk of modern slavery in their supply chain (identified or unidentified). In Australia, in the 2024-2025 Financial year the AFP received 420 reports of modern slavery and human trafficking in Australia, a 10% increase on the previous year and the highest year on record.

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 measured and reviewed by our Quality Assurance team in partnership with our Legal and Human Resources team. We set indicators to monitor and, where relevant, measure against to assess the performance of our processes. Those indicators include, but are not limited to, measuring the percentage of suppliers who have Modern Slavery Statements on the Australian (or related) register or conform to Modern Slavery risk management requirements. We continue to review and improve on these performance indicators adding or improving where possible.

### **Actions Taken to assess and address Modern Slavery Risk**

#### **Assessment**

Milne continues to develop its approach to measuring the effectiveness of modern slavery risk controls. At this stage, our assessment is mostly qualitative (and part quantitative) and is informed by:

- (a) The outcomes of our internal and external compliance and monitoring activities
- (b) Supplier risk management processes; and
- (c) Reviews of internal grievance mechanisms and reporting channels, including consideration of the absence or presence of reported concerns.

We acknowledge that further work is required to develop more robust measures of effectiveness, including clearer indicators of supplier compliance and risk mitigation outcomes. As no modern slavery issues have been identified during the reporting period there has been no opportunity to review the effectiveness of remediation measures.

#### **Actions, 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 2024/2025 reporting period:

- **Active review and monitoring** of our dedicated reporting mechanisms, that includes steps taken to improve staff awareness and information guidelines to increase understanding and accessibility;
- Provision of an anonymous reporting options including the placement of a physical reporting box for those with limited access to online system. 3 grievances relating to labour practices were raised and investigated during this reporting period.
- **Ongoing application of Milne procedures** governing engagement of contract labour and labour hire including consultation and communication with suppliers to work to reduce and manage risks associated with contract labour arrangements.

- **Review contractual arrangements** with labour hire providers to ensure alignment with Milne Modern Slavery policy and procedures.
- **Continuing review of pay rates and employment conditions** for direct hire employees as well as an our audit process for any people working on our site through a third-party labour supply company. A 90% of these suppliers were audited during the reporting period.
- **Policies and procedures** to supporting ethical recruitment and hiring practices (and ongoing employment and payroll practices) and to support the management of the risk of modern slavery in our operations and supply chain particularly in the recruitment and hire process.
- **ongoing process of assessment** of our third-party suppliers (integrated with Milne quality and purchasing processes). Review and assessment of current suppliers' compliance with modern slavery legislation in Australia including review of modern slavery statement (mandatory or voluntary) on National register.
- **Continued training:** 100% of the training goals were met resulting in development of those teams knowledge and understanding in order to support identification and prevention of modern slavery risk;
- **Participation as a member of Sedex** to support supply chain transparency and risk assessment.

### 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.

Milne maintains mechanisms for workers and third parties to raise concerns confidentially. Where modern slavery risks or indicators are identified, we are committed to investigating, engaging with stakeholders and taking appropriate remediation action.

During this reporting period no confirmed instances of modern slavery were identified or reported within our operations. We recognise that the absence of reported incidents does not necessarily indicate the absence of risk and we continue to encourage the raising of concerns.

### 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:

Area	Current	Next Cycle Action
Governance	CEO and Executive	Review management level ownership and reporting cadence, seek to develop clearer measures to support governance oversight
Risk Mapping	In place	Develop risk prioritisation tools and update the risk register to capture controls across existing frameworks (where not currently explicit)
Supplier	Tier 1 focus	Develop deeper engagement with selected higher risk suppliers
Measurement (effectiveness)	Qualitative	Review current system with a view to developing clearer indicators of effectiveness (continuous improvement)
Training	In place	Expand to include training to include broader staff groups and develop a structured internal awareness program
Reporting	Descriptive	Review for opportunities to develop clearer outcomes, learnings, and limitations in future reporting

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

A handwritten signature in black ink, appearing to read 'G. Spencer-Laitt', with a horizontal line extending from the end of the signature.

Graham Spencer-Laitt  
Managing Director and Chief Executive Officer  
December 2025