

Modern Slavery Statement

2024



LINDSAY AUSTRALIA
LIMITED

Contents

01. INTRODUCTION2

ACKNOWLEDGEMENT OF COUNTRY

NOTE FROM OUR CEO

ABOUT THIS STATEMENT

02. ABOUT LINDSAY AUSTRALIA3

OUR OPERATIONS

THE LINDSAY WAY

OUR GOVERNANCE

OUR WORKFORCE

OUR SUPPLY CHAIN

03. UNDERSTANDING OUR MODERN SLAVERY RISKS7

OUR APPROACH

GAINING INSIGHT INTO OUR SUPPLY CHAIN

OUR KEY RISKS

REASSESSING OUR RISK PROFILE

04. ADDRESSING OUR MODERN SLAVERY RISKS13

ORGANISATIONAL STRATEGY

GOVERNANCE

ETHICAL RECRUITMENT

CAPABILITY & AWARENESS

RESPONSIBLE SOURCING

GRIEVANCE & REMEDIATION

STAKEHOLDER ENGAGEMENT & COLLABORATION

05. MEASURING OUR EFFECTIVENESS18

06. CONCLUSION20



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

Lindsay Australia continues our commitment to upholding human rights and addressing modern slavery across our operations and broader supply chain, with our 2024 Modern Slavery Statement outlining our progress.

To ensure Lindsay Australia does not cause or contribute to modern slavery in any way, we have been proactive about continuing to improve our governance and modern slavery risk identification systems and processes. In doing this, we aim to positively impact Australia, where we operate, and globally in locations where our supply chain extends for the good of our people, our planet and future generations.

Improving the safety and well-being of the workforce and ensuring the protection and promotion of human rights across facilities, transport, and our entire supply chain are central to the “Lindsay Way”. Our reputation and the success of our business rely on a continued commitment to ethical practices, transparency, and mutual respect. We achieve this through tangible actions guided by values that dictate how we manage our business operations.

During this reporting period, we expanded our operations with the acquisition of WB Hunter, a retail agricultural and construction supply company. As a result, we reviewed our supply chain and product lines, including considerations around any new potential exposure to high-risk sectors, ensuring we remain mindful of our impact.

Our 2024 Modern Slavery Statement reaffirms our commitment to understanding modern slavery and taking steps to eradicate it. This year's statement outlines progress in supplier engagement. It provides an update on our three-year roadmap, demonstrating our actions towards mitigating the risks of modern slavery within our business and our plans for the next reporting period.

Lindsay aims to increase transparency and awareness across our operations and our broader supply chain so that we continue to be a fair, safe and inclusive workplace.



Clay McDonald
Chief Executive Officer

ABOUT THIS STATEMENT

Lindsay Australia Limited ABN 81 061 642 733 has produced this Modern Slavery Statement in accordance with Section 16 of the Modern Slavery Act 2018 (Cth), (the “Act”) for the financial year ended 30 June 2024. It identifies the steps Lindsay Australia Limited took to identify, assess, mitigate and remediate modern slavery risks in their operations and supply chains during the financial year.

All references to our, we, us, the Company, the Group, Lindsay Australia and LAL collectively refer to Lindsay Australia Limited ABN 81 061 642 733 and its reporting entities and subsidiaries, including WB Hunter Pty Ltd ABN 39 008 410 900, 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 2024 unless otherwise stated. All monetary values are expressed 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 WB Hunter, Lindsay Transport, Lindsay Rural, and Lindsay Fresh Logistics.

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.

WB Hunter Rural

A rural merchandising business specialising in the provision of rural supplies, agricultural services, trade essentials and pet products.

2,738
company owned assets

2.4 mil.+
tonnes of freight delivered annually

13,000
customers along Australia’s east coast

44
branches situated across Australia

1,800+
farmers supplied

20
key regional locations

\$804mil.
full year revenue

100+
logistics clients supplied

THE LINDSAY WAY

Our business and people’s success depends on being a reputable organisation, and we believe that actions speak louder than words. As individuals and as a group, our behaviour will influence how the broader community views the Lindsay Group.

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

 - ✓ No compromise on safety & quality
 - ✓ See, report, action
 - ✓ Everyone home safe
- 


STRONGER TOGETHER

 - ✓ Support your teammates
 - ✓ Celebrate success
 - ✓ Trust & rely on each other
- 

OWN IT

 - ✓ Do what you say
 - ✓ Proud to represent Lindsay
 - ✓ Treat it like your own
- 

READY TO ADAPT

 - ✓ Be flexible & creative
 - ✓ Solutions driven
 - ✓ Thrive in any conditions
- 

DO WHAT’S RIGHT

 - ✓ Lead by example
 - ✓ Communicate transparently
 - ✓ Honesty & integrity



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 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

1,898

1,454 Permanent Employees

444 Casual Employees

43 Sites

Indirect labour

253

168 Linehaul Drivers

85 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, 2024

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.

FY24 Supplier Snapshot

3,371
suppliers

\$561 mil.
total spend

99%
Australian-based
suppliers

90+
categories across
goods and services



Business unit

Key supply chains

Lindsay
Transport

Transport, logistics, warehousing, cold chain

- 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

WB Hunter
Rural

Rural, trade and DIY supplies

- Fertilisers
- Chemicals
- Fencing
- Livestock products
- Packaging
- Nutrients
- Hardware
- Timber
- Trade supplies
- Pet products (including pharmaceuticals)
- Agronomy and feed testing 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 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.

¹ This 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

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

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

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.

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.



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 undertook 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.

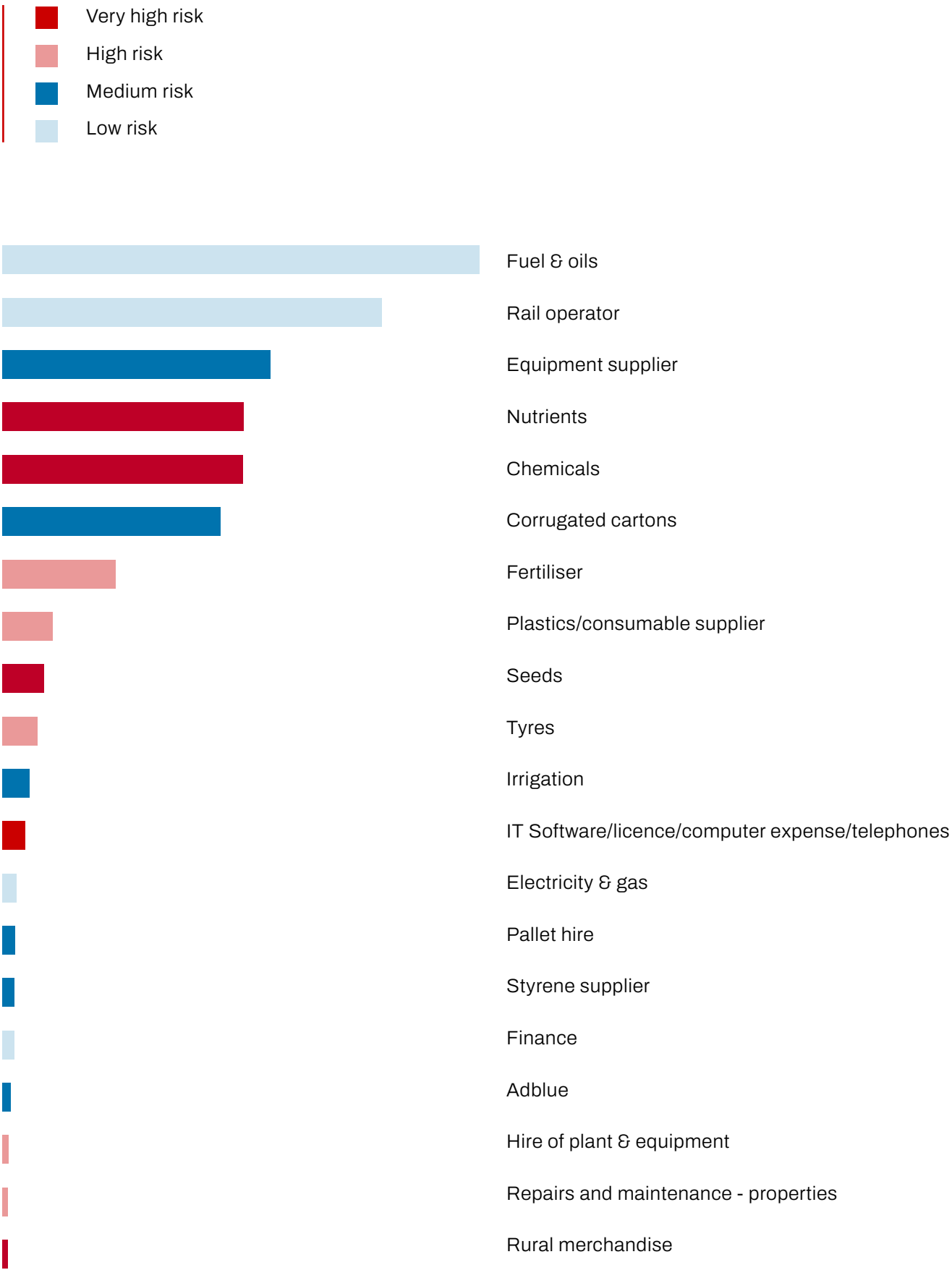
Note: Country-specific data is based on a risk assessment performed in 2022 prior to the acquisition of WB Hunter.

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

| | | | | | | | | | | | |
|--|---|---|---|--|---|---|--|--|---|---|--|
| Australia 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 | 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 | 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 | 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 | 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 | 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 | Uniforms Unloaders Vehicle monitoring Fees Warehouse storage costs Waste removal Weigh bridges Wharf fees Wire supplier Workers compensation | 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 & maintenance Repairs and | maintenance - properties Safety products Uniforms Germany Chemicals India Chemicals Irrigation Ireland Equipment supplier Repairs & maintenance Israel Nutrients | Japan Chemicals Equipment supplier Repairs & maintenance Tyres New Zealand Steel tubes Norway Nutrients Adblue Commercial Equipment supplier Repairs & maintenance Repairs and maintenance - properties | Rest of Southeast Asia IT software/licences/computer expenses/telephones Nutrients Plastics/consumable supplier Printing & stationery Fertiliser Nutrients Spain Nutrients United States Equipment supplier Hire of plant & equipment | IT software/licences/computer expenses/telephones Nutrients Oil & lubricants Expenses - VO Plant and equipment - owned Repairs & maintenance Vehicle monitoring fees Vietnam Plastics/consumable supplier |
|--|---|---|---|--|---|---|--|--|---|---|--|

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.

REASSESSING OUR RISK PROFILE

In the last reporting period, Lindsay Australia expanded its operations with the acquisition of WB Hunter, a retail agricultural and construction supply company. This addition has introduced new supply chain dynamics and product lines, such as building supplies (e.g., timber and metal) and equine health products, which include livestock feed and over-the-counter veterinary pharmaceuticals. These categories present additional considerations, including potential exposure to high-risk sectors such as timber sourcing and pharmaceutical supply chains.

While the core operational model of WB Hunter aligns closely with our existing Lindsay Rural wholesale operations, the acquisition has necessitated a reassessment of how these additional supply chains affect our overall risk profile. This reassessment focuses on understanding the new supplier base, identifying high-risk categories, and integrating WB Hunter into Lindsay Australia's broader governance and risk management frameworks.

Key steps taken during this period include:

Supply Chain Integration:

A comprehensive review of WB Hunter's supplier base is underway to assess alignment with Lindsay Australia's policies, including those related to modern slavery and sustainability.

Governance Enhancements:

As part of Lindsay Australia's strategic sourcing framework, mandatory modern slavery and sustainability criteria have been incorporated into all tender and vendor onboarding processes. These requirements will apply to WB Hunter's suppliers to ensure consistency across our operations.

Risk Assessment:

Initial reviews have identified timber and pharmaceutical products as priority areas for further investigation. These categories will be evaluated in greater depth in the coming year to ensure risks are appropriately mitigated.

While WB Hunter remains partially decoupled from Lindsay Australia's systems and governance processes during this integration phase, we are committed to ensuring its operations are fully aligned with our established standards. As part of this ongoing process, we are closely monitoring the new supply chain dynamics and expect to provide a more detailed update in the next reporting cycle.



Addressing our modern slavery risks

Case Study: Category Profiling and Risk Review

In the past financial year, Lindsay Australia conducted a category profiling and risk review to identify inherent modern slavery risks within its supply chain. This review assessed supply spend and vendor listings, focusing on categories such as timber and pharmaceuticals, which were identified as higher risk.

The profiling process also provided insights into geographical and product-specific vulnerabilities, allowing us to prioritise areas requiring targeted risk mitigation efforts. We then incorporated these findings into our procurement processes to improve supply chain oversight.

This recent category profiling and risk review supported Lindsay Australia's efforts to refine our approach to managing procurement and supply chain operations risks, ensuring we remain informed of those most relevant to us.

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.

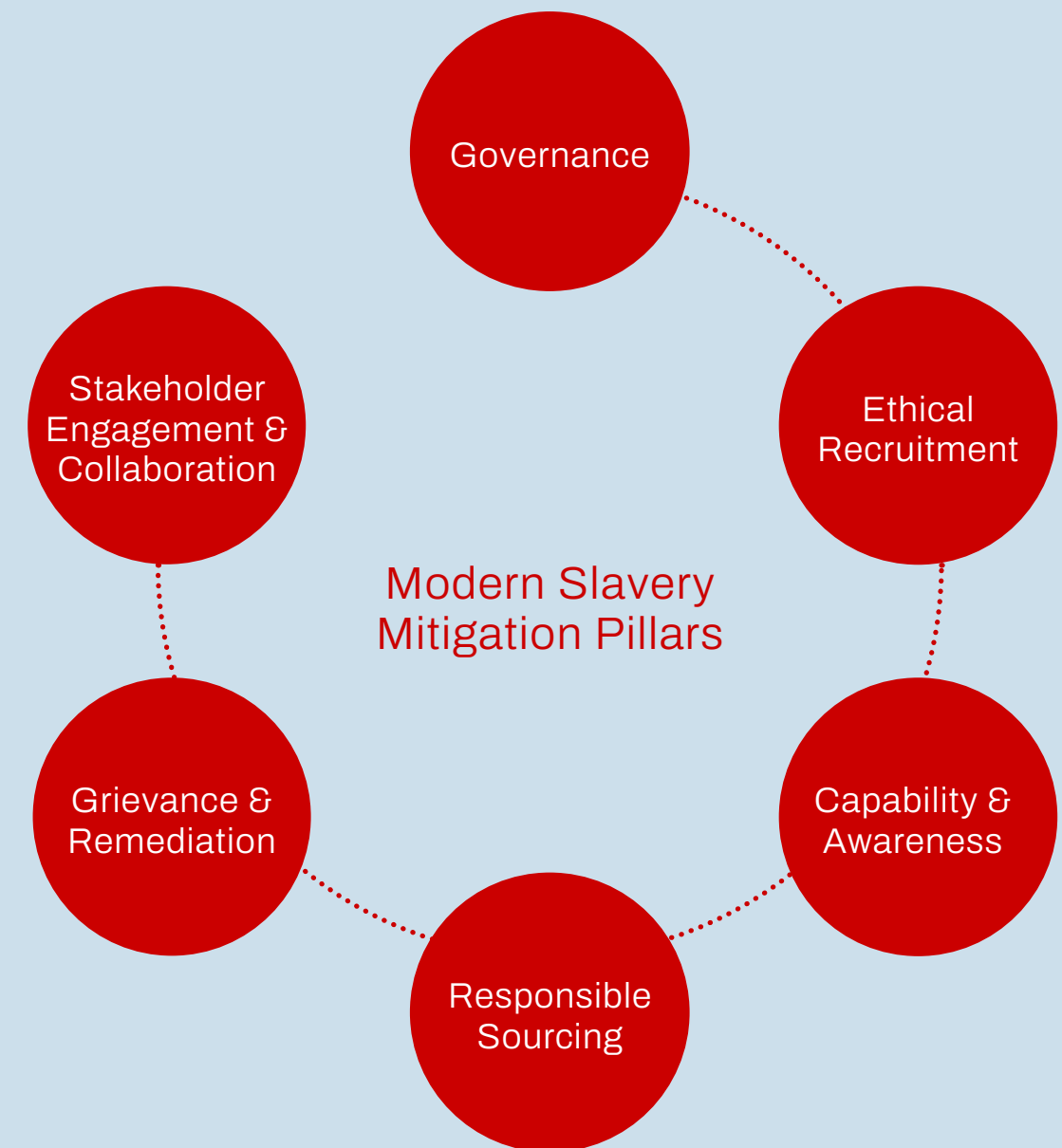


Figure 5. Lindsay Australia Limited Modern Slavery Mitigation Pillars

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.

Case Study: Strengthening Vendor Governance and Tender Activities

During the past financial year, Lindsay Australia introduced the role of Manager of Strategic Sourcing, responsible for centralising strategic sourcing activities and providing greater oversight in procurement processes. The role has been instrumental in implementing structured vendor governance frameworks, including improving our supplier onboarding and tender processes.

We also developed a procurement pipeline and strategic sourcing framework to strengthen supplier engagement and accountability. Sustainability criteria were also incorporated into procurement decisions to align with Lindsay Australia's commitments to ethical supply chain management and addressing modern slavery risks.

These changes reflect a focused effort to embed ethical practices into our procurement processes, enhancing governance structures and improving how we manage risks within our supply chain.

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.

Policy commitment

LAL has a strong suite of internal policies and processes that embed a responsible, practical process for each business unit. This reporting period, we developed our Modern Slavery and Human Rights Policy to guide our response, alongside other existing relevant policies, including:

- 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.

Steps taken

- ✓ The introduction of additional executive-level resources in key roles, supported by functional teams to strengthen governance and enhance internal capability
- ✓ Improved LAL Procurement Policy
- ✓ Updated DoA and purchasing frameworks
- ✓ Established Modern Slavery working group

Next steps

We will continue to improve our governance structures and policies by formalising lines of accountability and reviewing our policies and processes.



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

- ✓ Developed key criteria and processes for screening labour providers
- ✓ Screened 100% of new labour providers

Next steps

Introducing measures to address labour rights risks related to indirect workers who perform work for LAL remains a key priority for FY25. 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

- Thoroughly assess current providers through a screening framework.
- Develop a sustainable pricing model tool.
- Provide all relevant staff members with training.
- Consistent use of a sustainable pricing model.
- Conduct a spot check audit for each labour hire firm at least once a year.

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.
- Continue providing 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 FY24, we continued delivering our ongoing, mandated modern slavery training requirements for all full time staff. All staff are expected to complete a mandatory online 20-minute modern slavery module through our training portal and delivered by provider Kineo.

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.

Case Study: Progress in the Development of Due Diligence Frameworks

Lindsay Australia continued to develop its due diligence frameworks in the past financial year by implementing standardised vendor onboarding processes.

The new onboarding process includes a vendor form to support risk assessments during supplier engagements, providing a structured approach to identifying and addressing risks in the supply chain. We applied these processes across major procurement activities to ensure suppliers meet our governance and ethical requirements.

As part of Lindsay Australia's ongoing work to integrate due diligence practices into its broader procurement and supply chain management systems, these changes allow us a more thorough oversight of our potential modern slavery risks.

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.

Responsible Sourcing

Steps taken

- ✓ Included metrics for human rights and modern slavery into our Supplier Approval Program
- ✓ 100% of new suppliers completed Supplier Approval Program questions before engaging with Lindsay
- ✓ Established new vendor onboarding processes and vendor form

Next steps

We will continue to assess commodities and services across supply chains with significant risks beyond tier one. Although documentation is being finalised, we have updated our DoA, procurement framework and policy, and general guidance for vendor governance.

Future commitments

- Build modern slavery-specific model clauses to be incorporated into high-risk categories.
- 100% of high-risk category contracts contain a modern slavery clause.
- Develop category management plans for 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

- ✓ Developed a modern slavery remediation plan

Next Steps

With a targeted plan to increase awareness of grievance mechanisms with our high-risk service providers or labourers, we will continue to ensure everyone can use them effectively. Our new remediation strategy allows us to respond effectively and decisively to protect and remediate harm in any case of serious exploitation, and it will be updated as required.

Future commitments

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

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. With the introduction of Lindsay Australia's Manager of Strategic Sourcing role, we are better equipped to lead these activities.

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
- 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

- ✓ Newly created Manager of Strategic Sourcing role is leading engagement activities
- ✓ 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 for 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, with our newly created Manager of Strategic Sourcing role overseeing this. 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 FY25.

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 | | Complete |

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) | Complete |
| | | Thoroughly asses current providers through a screening framework | In Progress |
| | | All new Labour providers are screened | Complete |
| Engage with labour-hire firms to understand whether LAL's business model is contributing to pricing pressures | Phase 2 | Current labour hire firms are provided with an opportunity to give feedback through quarterly meetings | Complete |
| Develop a sustainable pricing model to verify contract price against statutory requirements | Phase 3 | Develop a pricing model tool (action) | Incomplete |
| | | Relevant staff members are provided with training | |
| | | 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 | Phase 2 | Metrics for human rights and modern slavery build into the Supplier Approval Program (action) | Complete |
| | | 100% of new suppliers complete questions before engaging with Lindsay (percentage) | Complete |
| | | 100% of top 30 suppliers (by spend) onboarded (percentage) | In Progress |
| Build modern slavery-specific model clauses to be incorporated for high-risk categories | Phase 2 | 100% high-risk category contracts contain modern slavery clause | |
| Develop and implement metrics associated with environmental and social performance for supplier monitoring | Phase 3 | | |
| 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 | | Complete |

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) | In Progress |
| | | 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 | | In Progress |
| 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

FY24 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 2023 to 30 June 2024. 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 19 December 2024.



Ian Williams

Chair of the Board of Directors
Lindsay Australia Ltd



152 Postle Street
Acacia Ridge QLD 4110

Locked Bag 2004
Archerfield Qld 4108

P: 07 3240 4900
W: lindsayaustralia.com.au