

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 2024 and describes what Milne has done to minimise the risk of modern slavery occurring in its operations and supply chains.

During 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 the information and updates relating to the same. This statement made on behalf of Milne and all related entities (including parent company Dowford Investments Pty Ltd ACN 093 388 446).

Introduction

This is the fifth Modern Slavery Statement for Milne.

The purpose of this statement is to update what we are doing to minimise the risk of Modern Slavery in our operations and supply chains. Milne remains committed to working with our stakeholders, suppliers, other businesses, and the broader community doing what we can 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 respond to risks that we identify across all aspects of our business.

Modern Slavery is behaviour that can be characterised as serious exploitation. Modern slavery examples can be seen in 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 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 maintains 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 Business

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 (via feed milling). We have developed and adhere to strict guidelines to ensure high welfare, free range premium quality meat from paddock to plate. Our brands include Mt Barker Free Range Farms, Milne

Feeds and Plantagenet Pork. Our sites are in regional and metropolitan Western Australia. We supply our products to consumers in Australia and Internationally.

Milne Agrigroup Operations and Supply Chain Risk

Operations

Being a primary producer means that we directly employ people to work at our sites where our product is manufactured, processed, and packed. All 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 or even modern slavery itself to people working at Milne Operations. In making this assessment we consulted with our recruitment and operations managers, and we all worked to develop policies, procedures and process 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 our operations we conduct desktop reviews and internal audits for compliance (internal and third parties). We prioritise consultation and recognise the right of employees to freely associate with trade unions and other 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 audit and or review the risks to those people and detail that process under 'Suppliers' below.

Suppliers

Milne products are Western Australian grown and made. A portion of our products also contain ingredients sourced from a supplier. Some products are mainly made of third party supplied ingredients and others a small portion or not at all. 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 use goods that we do not sell, such as IT equipment, plant and machinery (and plant and machinery consumables) used in production and PPE like gloves and aprons and safety equipment. We also contract with other third-party suppliers for the provision of services like logistics/transport.

The production of all goods and services are at risk of having practices of Modern Slavery in their supply chain regardless of whether located in Australia or overseas although, some locations and industries are at higher risk than others. We understand some countries do not have modern slavery law or governance requirements. Those countries are at high risk of having modern slavery practices in their supply chain. Milne identified that indirect hire or contract labour has a represents a higher risk having modern slavery practices in their supply chain (as opposed to local direct hire through Milne practices and procedures). In addition, some international countries are at a higher risk of having modern slavery practices in their supply chain so ingredients sourced from overseas may be 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 adapted existing processes with measures 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 conform to Modern Slavery risk management requirements. We continue to review and improve on those performance indicators adding or improving where possible.

Actions Taken to address Risk.

Performance Indicators and Assessment

In this reporting period we reviewed and adjusted how we use our performance indicators to assess the effectiveness of our actions. As part of that review, we have identified some key challenges. For example, while not a large part of our operations some suppliers are one off supplier, and that type of supply may benefit from a different set of performance indicators. This reporting year we implemented some new measures for assessment. The reporting and measurement of these changes is still being assessed. Preliminary review found that some parts are more subjective in nature which has limited value but as a part of an overall procedure it may be a useful process for some suppliers (especially one-off larger supply).

Focus on: Contract Labour (Indirect Hire of staff)

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 we remain committed to continuously improving our internal systems and processes to implement control measures in this key risk area of modern slavery in our operations. In this reporting period, in addition to our already established supplier management measures (which are ongoing) we introduced an additional process of human resources review and assessment of the tasks and roles performed by labour hire or contractors on our sites. This review involved an assessment of the reasons for hire, including reasons for the role/tasks, length of time that the supply has been provided and an assessment of the suitability of the employment basis. Outcomes included changing the basis for hire after finding that a role is a more permanent requirement. This review process will now form part of our processes to be implemented annually and comparing the results for each year will be included in our measurement processes on an ongoing basis.

Policies and Procedures

Milne Agrigroup has policies and procedures in place to support our fundamental commitment to ethical and humane production. For the 2023/2024 reporting period these included:

- Active review and monitoring of our dedicated reporting system that includes a confidential reporting mechanism, updating staff knowledge and information guidelines about the confidential reporting mechanism and increasing publications to increase staff awareness.
- Providing an online anonymous system for reporting and the placement of physical reporting box for those with limited access to online resources.
- Comply with the Milne procedure for the hire of contract labour and any labour supply
 arrangements, including the requirement for the consultation and communication with suppliers
 to work together to reduce and manage the risk to people working at our sites via contract
 labour or labour hire arrangements.
- Policies and procedures to support measures aimed at lowering the risk of modern slavery in our operations and supply chain.
- The continuation of our ongoing process of assessment of our third-party suppliers (which is linked to our quality and purchasing systems). Review and assess current suppliers' compliance with Modern Slavery legislation in Australia (for Australian suppliers only)
- Continuing training and updating training where relevant and required.
- We are a member of Sedex

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:

- Review and where necessary update our process and risk assessment considering all recent reporting of Modern Slavery incidences in Australia and Worldwide (maintain understanding of if or where there is changing global and local risks of modern slavery and keep our response current)
- Maintain and update review and assessment of our suppliers and broader supply chain risks.
 Maintain supplier monitoring reporting processes continual improvement in the process.
- Continue to roll training out to more teams, beyond purchasing and Human Resources and
 Occupational Health and Safety and staff facing administrative roles. 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. We are extending our training to include supervisory staff may meet staff or
 individuals who could be at risk of modern slavery that may not be or is not related to the
 employment relationship (for example forced marriage). Training staff in this way may assist with
 identification and support of persons at risk of modern slavery.
- 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 2023/2024 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 2024











