



Modern Slavery and Human Trafficking Statement 2020



This statement covers the activities of Finasucre Investments (Australia) Pty Limited ACN 062 315 593 (FIA) and its subsidiaries to understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chain.

Modern Slavery and Human Trafficking Statement

Introduction

The Australian Government introduced the *Modern Slavery Act 2018 (the Act)* to support the Australian business community to identify and address their modern slavery risks. The Act was also introduced for companies to maintain, responsible and transparent supply chains.

This is the first Modern Slavery Statement for Finasucre Investments (Australia) Pty Limited (FIA), as required under the *Act*. The reporting period for this statement is 1 April 2019 – 31 March 2020.

The purpose of this statement is to outline our approach to ensure that FIA has vigorous frameworks and processes in place to minimise the risks of modern slavery in our business operations and supply chain.

We acknowledge that slavery and human trafficking can occur in many forms, including slavery, servitude, human trafficking forced labour, child labour and deceptive recruitment processes.

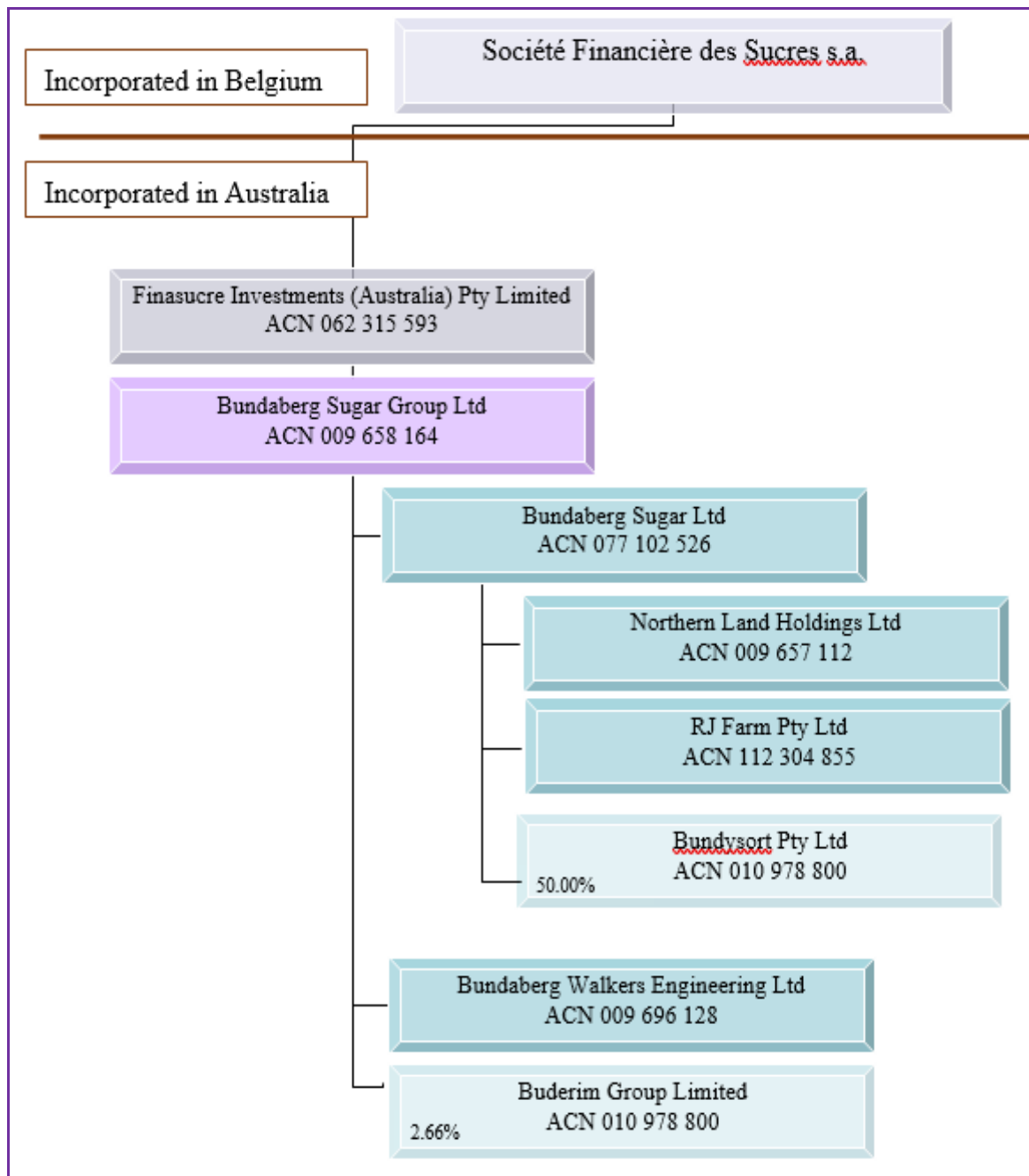
FIA is committed to responsible operations and establishing and adhering to the utmost ethical standards across our group of companies. FIA is committed to comply with the labour rights standards, legislation and statutory requirements. We act ethically and with honesty in all our business dealings. In order to achieve this, we require our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.

Our business

Since our first founding in 1882, FIA has progressed significantly in relation to recognising the inherent dignity of all people, we are committed to respect and promote human rights now and into the future. As a leader in the Australian Sugar Industry we are proud to be a well recognised household name.

FIA is structured as a private company and is managed by a Board of Directors. The diagram below depicts the corporate structure with ownership being 100% unless otherwise noted.

FIA Corporate Structure



Traditionally FIA has been a grower, miller, refiner, and marketer of sugar and related products in Australia and owns and operates a sugar mill and refinery in Queensland. Last season there, were two sugar mills in operation and between them crushed just over 1,095,311 tonnes of sugar cane producing 152,897 tonnes of sugar. Approximately 83% of this sugar is refined and provided to Australian customers for domestic consumption.

The mills produced around 40,000 tonnes of molasses (by-product of sugar cane) and provides this to Bundaberg Molasses at our Oakey manufacturing site. Bundaberg Molasses produce a range of molasses-based supplements and formulated product to the Feed Lot industry. They also supply supplementary paddock feed to dairy and pasture customers via their brand Prolix.

The company's operations also include Bundaberg Walkers Engineering Ltd (BWEL), one of Australia's longest established, heavy engineering and foundry enterprises. Based in Bundaberg, the company generally has a revenue turnover of \$30m supplying domestic sugar mills and exporting sugar milling equipment and knowhow to countries including Thailand, Indonesia and Mexico.

FIA is one of Australia's largest cane growers with up to 500 employees over its range of activities. In addition to growing sugar cane, FIA also grows and harvests a variety of small crops not limited to sweet potatoes, ginger, turmeric, blueberries, pineapples, soy beans etc. The Company is able to rotate these crops to obtain the most sustainable and beneficial use of the land it has invested in, just over 20,000 hectares in the Wide Bay region.

Risks of modern slavery within FIAs Supply Chains

The Global Slavery Index for Australia reports that forced labour exploitation predominantly occurs within certain industries, one of them being the agricultural industry.

To address our labour requirement within this facet of the business, FIA engages workers through a third-party contractor to work in our small crops. These suppliers predominately employ workers, who are within the exploitation risk category. Specifically, individuals who are employed through;

- Working holiday visas;
- Seasonal worker program visas; and
- To a lesser extent, individuals on international student visas.

Actions taken to assess and address risks

During the year the company has identified some risks and prepared this modern slavery statement. Commencing from 2021, FIA will be undertaking a number of initiatives to identify, assess and address our modern slavery risks and to ensure that we maintain responsible and transparent supply chains.

To address the risks of modern slavery within our operations, FIA has created a supplier declaration questionnaire. Suppliers will be required to complete this questionnaire, prior to 27 February 2021 or upon their initial engagement. To ensure ongoing compliance, suppliers will be required to complete the supplier declaration questionnaire on a 2-year basis.

The questionnaire, which is in the form of a statutory declaration, covers topics which can be indicators of modern slavery, such as;

- Ethical trading (freedom of movement, holding of identification documents;
- Provisions around accommodation (compliance with local laws, charges etc.)
- The supply of transport;
- Worker representation (unions);
- Employment conditions (lawful and reasonable deductions); and
- Subcontracted labour.

To become a FIA approved supplier, small crops contractors are required to complete the supplier declaration questionnaire.

After reviewing the completed supplier declaration questionnaire, FIA will determine whether the engagement methods and arrangements the supplier has in place need further investigation, or whether the supplier's responses indicate a minimal risk of modern slavery.

Assessing the effectiveness of our actions

In order to determine the effectiveness and validity of the supplier declaration questionnaire and to lessen our exposure to modern slavery, FIA will assess the effectiveness of our actions to ensure the standards of compliance, quality, reliability, social and ethical responsibilities are met. This will be done by;

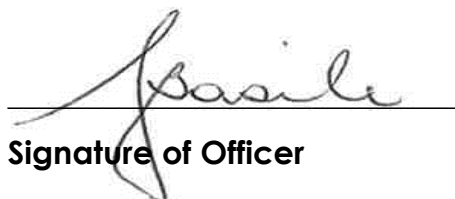
- Conducting random interviews with workers;
- Conducting adhoc exit interviews with workers; and
- Administering a confidential whistle-blower hotline for workers to access.

Consultation with other entities owned by FIA

Finasucre Investments (Australia) Pty Limited submits this report on behalf of the Bundaberg Sugar Group. Consultation has taken place with other entities of the group via discussions at the Bundaberg Sugar Group Board meetings.

This Statement was approved by the Board on behalf of each of the reporting entities on 18 February 2021 and is correct as of that date.

Signed on behalf of the Bundaberg Sugar Group Board of Directors



Signature of Officer

Gaetano Basile

Name of Officer

Director

Position