



Modern Slavery Act Statement

December 2021



We feed the world with purpose, creativity and care

Overview

This statement has been made in accordance with section 16 of the Modern Slavery Act and is published by AgTrade International Pty Ltd (ACN 139 280 461) and its subsidiaries (the “AgTrade Group” or “AgTrade”). AgTrade seeks to be a socially responsible organisation and is committed to preventing and addressing modern slavery in supply chains.

AgTrade is an Australian-owned livestock, genetics and food security group based in Brisbane, Australia. Our vision is to feed the world with purpose, creativity and care. We own and operate a diversified portfolio of agribusinesses developed over almost 50 years. A shared common purpose of all our businesses is to create, build and nurture long-term sustainable and premium export markets for Australian primary producers. We are an important source of farm income for many primary producers and farming families, and contribute to the prosperity of rural communities. We publish a detailed sustainability report to our investors in respect to the social responsibility and governance aspects of our operations, including Modern Slavery Act compliance.

Structure

AgTrade International Pty Ltd is the parent company of the Group which controls a number of wholly-owned subsidiaries, operating as autonomous businesses with equity and debt capital provided by the Group. These businesses operate in accordance with AgTrade Group investment, finance and risk management requirements, including social and environmental responsibility and governance. We have a range of reporting structures and systems in place directed at assuring and supporting effective and pro-active AgTrade oversight.

The key businesses operated by these companies during the 2021 calendar year and for the FY21/22 financial period are:

- An Australian-processed premium beef and protein export business (Paradigm Foods)
- An animal nutrition product business (ThriveAgri); and
- Three businesses operating under the AUSTREX brand
 - Global breeder cattle and genetics
 - Feeder cattle
 - An elite breeding business.

Operations and Supply Chain

The supply chains of our businesses encompass every point from on-farm livestock, to receipt by customer at end destination. The longevity of our business and the strength of our brand relies heavily on assuring the high-quality genetics, origin traceability and animal welfare standards of our product.

Our supply chains typically start on farm (predominantly in Australia and New Zealand) where we source cattle and other livestock, as well as produce such as hay, from primary producers.

The breeding livestock we purchase are agisted on over 40 rural properties across south-eastern Australia; we also maintain our own breeder cattle herd in Tasmania.

To prepare our livestock for either domestic processing or export markets, we contract the services of a range of rural businesses, including feedlots, quarantine facilities, veterinarians and other animal health providers. These services are utilised in locations across Australia and New Zealand.

We contract the services of select Australian abattoirs to process our beef, and specialist sea, land and air transport providers to deliver our livestock to our customers. In the case of our breeder livestock and genetics, we provide our international customers with further post-sale technical support, such as veterinary and other animal husbandry services, in-country.

Our customer-focused business is made possible by our team of approximately 150, headquartered in Brisbane, Australia, but with employees in most States and the Northern Territory. We also employ some offshore team members, predominantly in Indonesia (further details below).

Risks of Modern Slavery Practices

The Company Secretary and Legal Counsel has completed a risk assessment on AgTrade's supply chains to identify possible exposure to modern slavery and has found the risk level to be low. The main points noted in reaching a low overall risk assessment include:

- The positive responses of a number of significant AgTrade suppliers, some of whom have produced their own Modern Slavery Act statements or other assurance materials.
- The predominantly Australia and New Zealand base for AgTrade's cattle procurement and other key supply chains which, according to the latest Global Slavery Index, have a low prevalence of modern slavery.

While risk was assessed to be low overall, some of the possible risks identified in our supply chains arise from the lack of visibility into the operations and supply chains of our suppliers. AgTrade's Board acknowledges good governance leaves no room for complacency and so requires all businesses in the AgTrade Group to demonstrate appropriate vigilance.

To that end, AgTrade has rolled out mandatory training through its online learning portal to educate staff on how to recognise modern slavery and actions to take. All staff are required to complete this training, and it will form part of all staff inductions going forward.

Assessing and Addressing Modern Slavery Risks

Due diligence, systems and related actions

Area	Status and actions
Australian and New Zealand farms and primary producer properties	We share this supplier class in common with other Australian consumer supply chains including supermarkets and abattoirs. We note substantive work undertaken by a number of counterparties in these supply chains and will continue to engage with those fellow offtakers and with industry associations in pursuit of global best practice.
Transport (air, land and sea)	Many of our major air and sea transport providers have provided us with Modern Slavery Act statements or other Board-level assurances. AgTrade continues to engage and communicate with its supplies to encourage them to review their own supply chains and join us in pursuit of global best practice.
Recruitment and Selection Policy	AgTrade gains assurance from our third-party HR Business Partners (part of our annual audit) to ensure our recruitment and selection processes are efficient, robust and delivered in a manner that ensures candidates are treated fairly, equitably and consistent with legislative requirements and stakeholder expectations.
Employment and engagement terms	AgTrade regularly obtains legal and other professional advice in Australia and New Zealand to ensure that employment and other team engagement terms are appropriate. All team members are engaged under employment contracts or negotiated agreements. While most of our approximately 150 team members are located in Australia and New Zealand, we also have a team of 14 in Indonesia. During the year, we obtained external assurance with regard to the appropriateness of those employees' remuneration as an additional routine governance step.
Employee education and awareness	All staff must complete an online learning module on Modern Slavery through the AgTrade Learning Portal. This module forms part of the induction process.

Policies and Procedures

AgTrade has comprehensive policy frameworks and operating procedures in place to ensure that our employees and contractors clearly understand our expectations while also providing them with our commitments to how they will be treated at AgTrade.

Policy/Procedure	Purpose
Code of Conduct	Outlines a minimum set of standards and behaviour required of all AgTrade Employees, Contractors and Directors.
Anti-Bribery Policy	Affirms that AgTrade has never tolerated, and will not tolerate, any form of bribery and corruption within its business.
Anti-discrimination, Bullying and Harassment Policy	Outlines the relevant definitions, principles and obligations in relation to unlawful discrimination, bullying and harassment, as well as AgTrade's expected standard of conduct in these areas.
Whistleblower Policy	Encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving AgTrade and provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

Progress Update

2021 Steps	Actions Taken
Continue to seek Modern Slavery Act assurances and commitments from our suppliers where adjudged appropriate.	AgTrade continues to engage and communicate with its suppliers where appropriate, and pleasingly we have received written modern slavery assurances back from a financially significant subset of set of our suppliers.
Add a modern slavery clause into supplier contracts for products or services with a higher level of modern slavery risk.	Continuous improvement: This is a permanent standing action item to be considered as contracts come up for renewal
Team member training on modern slavery, prioritising those people managing higher risk activities.	Modern Slavery e-learning module now part of mandatory training for all staff and included in on-boarding for all new staff.
Develop and set key performance indicators to measure the effectiveness of our actions to assess and address modern slavery risks.	Critical Result Areas (CRAs) continue to be been set by each business leader.

Measuring Effectiveness

Effectiveness of actions taken will be measured through a range of activities including our risk management and assessment process, policy reviews, supply chain disclosures to the AgTrade Board, site visits and team engagement. AgTrade will continue to monitor our compliance with our overseas workforce obligations, in partnership with our payroll and tax advisory teams located in each jurisdiction.

Consultation with Controlled / Owned Entities

All Australian entities share the same Company Secretary who has been involved in the preparation of this statement.

Our Commitment

AgTrade is committed to working collaboratively with our stakeholders to increase our understanding of modern slavery risks and how we can address them.

This is our Modern Slavery Statement for the year ending December 2021, made pursuant to the Modern Slavery Act (2018). It has been approved by the Board of AgTrade International Pty Ltd.

Signed in accordance with a resolution of Directors.



Justin Slaughter

Managing Director and Chief Executive Officer

