

2023 MODERN SLAVERY STATEMENT

PARAWAY PASTORAL COMPANY PTY LIMITED

INTRODUCTION AND IDENTIFICATION OF REPORTING ENTITY

This statement is published on behalf of Paraway Pastoral Company Pty Limited, ACN 14 122 572 641 of 70 McNamara Street, Orange, New South Wales (**Paraway**). This statement is made by Paraway as a reporting entity pursuant the *Modern Slavery Act 2018* (Cth) for the reporting period from 1 July 2022 to 30 June 2023. Paraway does not own or control any other entities.

Paraway has not identified any instances of modern slavery or human trafficking associated with its own operations or through its supply chain throughout the 2022 financial year. In addition, Paraway has not received any concerns from its staff or contractors regarding modern slavery or human trafficking through the 2022 financial year.

PARAWAY'S STRUCTURE AND OPERATIONS

Paraway is an agricultural company that operates pastoral enterprises across the eastern side of Australia. Those enterprises include beef breeding, growing and grass backgrounding, sheep breeding and growing, wool production, and cropping (for both sale and fodder).

Paraway operates a total of 27 pastoral enterprises and its operations are divided into three regions:

- Northern, consisting of properties in Queensland;
- Central, with properties in northern and Western NSW;
- Southern, including Southern NSW and Victoria.

Collectively the properties have the capacity to carry over 220,000 cattle and 250,000 sheep. Dryland and irrigated cropping exist in each of the regions produce hay, silage and grain crops for external sales and feeding livestock.

Paraway is committed to being a consistent and reliable supplier of quality produce from its pastoral enterprises and operating a sustainable business that targets long term returns whilst effectively managing short term risks. It employs approximately 300 people.

OUR SUPPLY CHAINS

Paraway procures a range of products and services that are necessary to undertake agricultural operations. A significant number of our suppliers' operations are located and based in regional Australia; however, our procurement activities do include purchasing goods and services from suppliers who provide products with overseas components, including equipment and chemicals. The goods and services procured are those ordinarily used in agricultural enterprises and required for animal maintenance and welfare.

RISKS OF MODERN SLAVERY PRACTICES

Due to the nature of our business and our governance model, we consider ourselves to be low risk with respect to modern slavery practices in our operations and supply chains. This was confirmed by a modern slavery assessment that was undertaken during the reporting period, which did not reveal any high-risk suppliers in Paraway's supply chains. That assessment is discussed in further detail below.

Paraway's staff are employed locally, and all directors, management and staff must adhere strictly to Paraway's conduct standards, as set out in its Code of Conduct and other policy documents. As a result, we have identified our own operations handled by staff directly employed by us to be a low modern slavery risk.

Given most of Paraway's suppliers are located regionally, we also believe these suppliers have a lower risk of modern slavery occurring in their supply chains as their operations are Australian-based and they are required to comply with the *Modern Slavery Act 2018* within their own supply chains.

ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS OF MODERN SLAVERY PRACTICES

Modern slavery risk assessment

Over the reporting period Paraway mapped its key suppliers and service providers to enable us to undertake a risk assessment of any modern slavery risks, or potential risks, within our key supplier's operations and supply chains. Paraway has completed this process for its key suppliers and will continue this process over the next year with more of its suppliers. Paraway understands that the environmental, social and governance risks relating to suppliers varies depending on their geographic location and size. The processes and systems that are implemented by Paraway are designed to reflect proportional risks.

The risk assessment process allows for the identification of high-risk suppliers who are either located in or source their goods from high-risk countries, for example, the procurement of machinery from suppliers who have manufacturing plants overseas. Any high-risk suppliers identified through the due diligence process will be requested to complete a Modern Slavery Supplier Questionnaire and allow us to ascertain whether they have implemented adequate steps to mitigate modern slavery risks and whether their supply chains follow an ethical sourcing policy. Paraway has not identified any high-risk suppliers in its review to date.

Internal policies and procedures

Paraway strives to achieve the highest standards of ethical behavior in the conduct of its business activities. It supports and respects the protection of internationally proclaimed human rights. Paraway endeavors to avoid being complicit in human rights abuses and will not tolerate slavery, human trafficking, abusive or unfair treatment in its business or supply chain.

Paraway continues to take steps to ensure that slavery and human trafficking play no part in its business or supply chains by developing applicable policies and practices in relation to corporate responsibility, procurement, and human resources.

As part of our human resources policies and procedures, Paraway seeks to ensure compliance with all relevant local laws and regulations. Paraway has in place procedures to manage employee welfare and endeavor to ensure all employees and contractors are paid at least the minimum entitlements applicable and regularly reviews those procedures.

Governance framework

Paraway is committed to employing corporate governance practices that support our compliance with applicable standards and legislative instruments and align with community expectations. The Paraway Board plays the principal role in the direction of corporate governance. The Board's responsibilities include governing, guiding, and directing Paraway towards the satisfaction of company objectives and protecting the interests of our employees, shareholders and the community. The Board is accountable for ensuring the appropriate management of modern slavery risk, by providing appropriate governance and direction to operational leadership. The operational leadership is represented by the Chief Executive Officer (CEO), the General Counsel and operational General Managers. Each General Manager is responsible for the facilitation of the operational and strategic risk management.

Procurement processes

Paraway seeks suppliers with similar values, ethics, and sustainable business practices, including those relating to human rights. Paraway acknowledges and recognises that the conduct of its suppliers can have a significant impact on Paraway's performance and reputation within the communities that it operates.

Paraway is introducing due diligence requirements for suppliers which highlights the need for suppliers to take steps to avoid or eliminate slavery and human trafficking from their supply chain.

Training

Paraway has delivered training modules for all relevant staff who manage supply relationships to stress Paraway's zero tolerance on slavery and human trafficking. Relevant staff will be required to undertake this training on a regular basis and all new staff undertake training in employee induction. Paraway will publish this statement on its website and make available to all contractors during their induction processes.

Grievance and feedback mechanisms

Paraway has whistleblower and complaints policies which provide employees and contractors an avenue to raise concerns in a confidential manner, including any modern slavery concerns.

Where modern slavery practices are identified in our supply chain or operations, Paraway will work to address these on a case-by-case basis by evaluating the severity of the issue and seeking expert guidance (where appropriate) to determine and then implement a corrective plan of action that is appropriate to the situation. In circumstances where we have reasonable grounds to believe that there

are ongoing modern slavery practices, or failure to adhere to a corrective plan of action, we will not continue to support a supply chain or vendor.

EFFECTIVENESS OF ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

The Paraway Board is responsible for overseeing and advising on:

- Processes used to monitor, communicate, and comply with Paraway's policies, laws, guidelines;
- Employee behaviour with respect to risk and compliance; and
- Reviewing and assessing of the actions taken to assess and address modern slavery risks during each reporting period.

This modern slavery statement was approved by Paraway's Board of Directors in their capacity as principal governing body of Paraway on 15 August 2023 pursuant to s 13 of the *Modern Slavery Act 2018* (Cth).

A handwritten signature in black ink, appearing to read 'Bruce Terry', with a large, sweeping flourish extending to the right.

Bruce Terry

Chairman, Paraway Pastoral

28 August 2023