



Modern Slavery Statement 2021



Our Mission

To provide effective and responsible solutions that enhance human life, through protecting and nurturing the environment, supporting a sustainable future.

01 Purpose

Enhancing human life by protecting and nurturing agriculture and the urban environment.

02 Vision

Be a profitable supplier of choice for the Agriculture, Nurseries, Pest, Turf and Landscape industries.

03 Values

Respect, Achievement, Teamwork, Ownership and Excellence



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Criteria 1: The Reporting Entity

This is a joint modern slavery statement under section 14 of the Modern Slavery Act 2018 (Cth) (the Act) and covers Australian Agribusiness (Holdings) Pty Ltd (Australian Agribusiness) ACN 135 355 958 and its subsidiaries.

Australian Agribusiness recognises that Modern Slavery can occur in many forms, including forced labour, debt bondage, child labour indentured servitude, human trafficking, forced marriage and deceptive recruiting for labour or services (Modern Slavery).

Australian Agribusiness has a zero tolerance for human rights violations including modern slavery and labour rights violations.

We understand that the private sector, along with other stakeholders, plays a key role in the fight against modern slavery and that the Act encourages businesses to assess and address Modern Slavery risks in their operations and supply chain.

This statement outlines our approach to ensuring we have robust processes and frameworks in place to minimise the risk of Modern Slavery in our operations and supply chains.

Business plays an important role in respecting and promoting human rights and eradicating modern slavery. Australian Agribusiness recognises that modern slavery is a growing and complex problem and is best addressed by a collective commitment and responsibility to bring it to an end and we are committed to working with all our stakeholders to fulfil this common goal.

Australian Agribusiness promotes respect, teamwork and ownership across all our operations and partnerships, and is guided by the following principles

1. Supporting the physical safety and health, psychological safety and mental wellbeing of our employees
2. Actively minimising our environmental footprint, including through the reduction of waste and emissions
3. Ensuring respect for the diversity, rights and culture of all individuals
4. Compliance with all applicable employment and human rights laws wherever we do business



Criteria 2: Reporting entity structure, operations and supply chains

Group Structure

Australian Agribusiness Reporting Entities are ultimately owned Australian subsidiaries of CK Life Sciences Int'l (Holdings) Ltd, a company listed on the Hong Kong Stock Exchange. (Stock Code: 0775). Based in Hong Kong, and bearing the mission of improving the quality of life, CK Life Sciences is engaged in the business of research and development, manufacturing, commercialisation, marketing, sale of, and investment in, products and assets which fall into three core categories - nutraceuticals, pharmaceuticals and agriculture-related. CK Life Sciences is a member of the CK Hutchison Group. Australian Agribusiness (Holdings) Pty Ltd is an Australian based integrated manufacturer, distributor and provider of professional products and services to the agricultural, horticultural, turf and pest industries. We provide effective and responsible solutions that enhance human life, through protecting and nurturing the environment and supporting a sustainable future. Having been incorporated in 2016, Australian Agribusiness brings together a number of trusted brands and companies that together share over 100-years of experience. As a parent company to these brands, we exist to provide strategic direction for our two divisions of Crop Solutions, and Professional & Consumer Solutions.

Our Brands

Accensi, a division of Australian Agribusiness, is a leading independent toll manufacturer of agrochemical and crop solution products. With innovative production facilities located in key growing regions around Australia, Accensi provides services for both local and international markets.

Amgrow, with its origins beginning in the early 1900's, Amgrow Home Garden has grown to be one of Australia's largest home garden product suppliers. Over more than a century, Amgrow has grown, diversified, and adapted to become the uniquely diverse sales and distribution business it is today.

Globe Pest Solutions are Australia's leading distributor of specialty products to the professional pest management sector. Holding strategic partnerships with both local and international manufacturers, Globe boasts a broad portfolio of solutions that stretches across all niches of pest management including general insect control, rodent and bird management, termite control systems, and hardware and safety equipment.

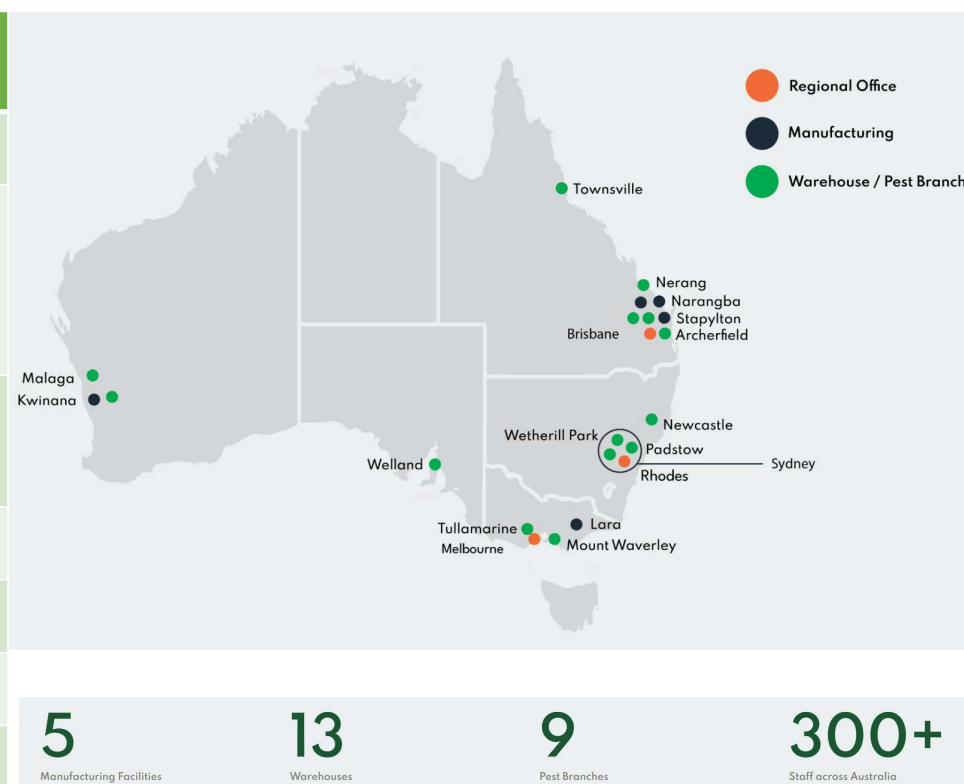
Nuturf and Equipment Solutions, with a proud heritage of innovation and investment in people and products, have been servicing the Australian turf managers for over 50-years. Nuturf and Equipment Solutions are leading manufacturers, innovator and distributor of products, equipment and agronomic services to the professional turf and amenity horticulture industry. Through a national network of qualified and experienced sales specialists and consultants we offer advice, solutions and support in plant nutrition, plant protection, soil agronomy and biology, supporting Australian turf professionals to get the most out of their surfaces.



Criteria 2: Reporting entity structure, operations and supply chains

Operations

Reporting Entity	Effective Percentage held by the Company	Overview
Accensi Pty Limited ABN 94 079 875 184	100	Manufacturing and marketing of plant protection products and soluble fertilisers
Amgrow Pty Limited ABN 81 100 684 786	100	Blending and distribution of fertilisers, manufacturing and distribution of horticultural products for the home gardening market, distribution of pesticides, and distribution of turf management products and provision of related services
Barmac Pty Limited ABN 21 009 674 953	100	Manufacturing and sale of fertilisers, pesticides and related agricultural products, the licensing of registration activities and the importation of finished agricultural goods
Equipment Solutions Pty Limited ABN 76 144 081 265	100	Distribution of professional turf management machinery, hardware, equipment and accessories
Globe Australia Pty Limited ABN 75 001 429 714	100	Distribution of turf fertilisers and chemicals, and professional pest products
NTAC Pty Limited ABN 17 621 752 181	100	Holding land and building
UTR Investments Pty Limited ABN 14 138 086 209	100	Holding land and building



Criteria 2: Reporting entity structure, operations and supply chains

Supply Chains

Australian Agribusiness' Reporting Entities (Australian Agribusiness) procure products and services from a number of countries across the world. These products and services fall into three categories as detailed below.

Products for resale Australian Agribusiness procures a large variety of goods and services for resale in its ordinary course of operations as outlined below.

Type of Goods or Service	Description
Merchandise Goods	Crop protection chemical products, professional turf products, pest control products, fertiliser, seed, turf and agricultural equipment
Professional Services	Professional consulting services for soil and plant analysis
Trade Labour	Installation and maintenance of professional turf including irrigation systems

Products and services for internal use Australian Agribusiness procures goods and services to support its manufacturing and other operations as outlined below.

Type of Goods or Service	Description
Raw Materials/Chemicals	Used in manufacture and formulation of plant nutrition, adjuvants, crop and turf protection products and pest control for sale to wholesalers, distributors and end-users
Professional Services	Professional consulting services for product testing and analysis, agronomic advice, auditors, tax consultants, legal advisors, insurance brokers, environmental consultants, workers compensation advisors, employee training and welfare
Contract Labour	To assist with short term and seasonal labour requirements
Transport	Vehicles, forklifts, mobile plant and equipment, service providers
Office equipment & staff welfare	Coffee, tea, other beverages, cleaning products, office furniture, printing, stationery
Information Technology	Electronics, desktop computers, laptops, landlines, mobile phones, data networks, server and IT system maintenance, software development
Facilities Management and utilities	Site maintenance, cleaning, electricity, gas, water



Criteria 2: Reporting entity structure, operations and supply chains

Other products and services Australian Agribusiness procures goods and services to support distribution of its products as outlined below.

Type of Goods or Service	Description
Network transportation and distribution	Third-party transport service providers for the transportation of finished goods and raw materials to Australian Agribusiness' manufacturing, warehouse and branch locations and customers
Warehousing Services	Third-party storage and management of finished goods
Drum Services	Transportation, cleaning and recycling of drums under the Drum Muster program



Criteria 3: Modern Slavery risks in our operations and supply chains

Risk Assessment

During the Reporting Period, our risk assessments included, but were not limited to, the following:

- Review of the latest advice from government and key industry associations on Modern Slavery control measures.
- A risk-based, assessment of our suppliers taking into account factors such as;
 - Industry risk.
 - Geographic location.
 - Business models.
 - Whether there is any potentially vulnerable groups within our operations or supply chains.
- Constant review of our employee recruitment, training, engagement, and remuneration.
- A review of our ongoing risk management practices including, processes, policies (including but not limited to recruitment, remuneration, discrimination, code of conduct), procedures, legal and statutory obligations.
- A review of working conditions and employee facilities within our operations and supply chain.
- Review of information received through whistle blower channels, customer or supplier complaints, any other grievances.
- Identifying any patterns or lead indicators that could point to Modern Slavery risks within our operations and supply chain.

Potential Risks within our Operations

As a result of our risk assessment, we consider that the risk of Modern Slavery occurring within Australian Agribusiness' operations to be low.

Australian Agribusiness employees operate in Australia only. According to the Global Slavery Index (GSI3) Australia is considered a low prevalence country for Modern Slavery risk. Our staff are provided training in Modern Slavery risks and our ongoing review of remuneration practices, including the introduction of competency frameworks, market benchmarking and independent assessment ensures that our staff are appropriately remunerated.

Where there is a reliance on labour hire for the provision of personnel, Australian Agribusiness minimizes risk through appropriate due diligence and assessment of labour hire suppliers in line with our risk assessment methodology.



Criteria 3: Modern Slavery risks in our operations and supply chains

Potential Risks within our Supply Chain

Certain manufacturing and material supply regions carry a higher risk of Modern Slavery by virtue of the potential prevalence of Modern Slavery in particular countries. Risks also exist in particular industries such as manufacturing and agriculture even in countries considered to have lower risks of Modern Slavery.

Australian Agribusiness recognises that both ourselves and a large number of our direct suppliers rely on global supply chains for the supply of goods and services to us. Given the extensive nature of these supply chains, it is challenging for us to have direct and meaningful visibility across our entire supply chain.

Procurement of Goods and Services Australian Agribusiness recognises that our supply chains are complex and are across many jurisdictions. Modern Slavery risks may potentially arise in the following procurement categories

Category	Description
Merchandise Goods	Merchandise goods are acquired as finished goods from multiple jurisdictions, particularly the United States and China.
Raw Materials/Chemicals	Raw materials/chemicals are acquired indirectly through customers for toll manufacturing and directly for fully formulated manufacturing from multiple jurisdictions, particularly the United States, China, India and the European Union. Australian Agribusiness has four manufacturing plants within Australia (Narangba and Stapylton in Queensland, Lara in Victoria and Kwinana in Western Australia) and has operational control of these facilities and working conditions. Historically, we would periodically travel to overseas suppliers to inspect the operations of our suppliers in a risk-based manner. Due to travel bans arising from the COVID-19 pandemic since early 2020 we have been unable to conduct direct inspections at these sites during the Reporting Period. We recognise that this potentially increases the risk for Modern Slavery to occur unmitigated.
Contract Labour	Contract labour is utilised by the business to support short-term and seasonal requirements. Candidates are sourced through reputable agencies which we have conducted appropriate due diligence and assessment for. Appropriate training including site familiarisation and on-the-job coaching occurs
Transport	Includes the importing, exporting and domestic movement of goods. This is an area where potential Modern Slavery risks may exist and we conduct appropriate due diligence and assessment of suppliers in line with our risk assessment methodology.
Office equipment & staff welfare	Coffee, tea, other beverages, cleaning products, office furniture, printing, stationery



Criteria 3: Modern Slavery risks in our operations and supply chains

Category	Description
Information Technology	Risks with human rights issues associated with the mining and production of minerals such as cobalt and lithium for laptop and mobile phone batteries and the manufacturing of IT hardware are well documented. These risks are common to any company that uses these goods and regardless of their industry or geographic location and is difficult to control Laptops, tablets, mobile phones and other computer hardware is sourced through reputable domestic suppliers. IT service and support is provided internally or through domestic support teams.
Cleaning	Cleaning has been identified as a higher risk industry for Modern Slavery primarily due to the high proportion of vulnerable workers in the industry and because these services are often performed by sub-contractors. As this is an area where potential Modern Slavery risks may exist we conduct appropriate due diligence and assessment of suppliers in line with our risk assessment methodology.
Contract Labour	Labour hired is used seasonally in both production and warehousing and is sourced through reputable labour hire suppliers where we have conducted appropriate due diligence and assessment. All labour hire is fully trained in role requirements, site safety, discrimination and the code of conduct
Transport	Includes the importing, exporting and domestic movement of goods. This is an area where potential Modern Slavery risks may exist and we conduct appropriate due diligence and assessment of suppliers in line with our risk assessment methodology.
Office equipment & staff welfare	Coffee, tea, other beverages, cleaning products, office furniture, printing, stationery
Facilities Management and utilities	Site maintenance, cleaning, electricity, gas, water



Criteria 4: Action taken to address Modern Slavery risks

Australian Agribusiness has undertaken a number of key initiatives to address the potential risk of Modern Slavery in our operations and supply chain. These include:

- The development and implementation of our Modern Slavery and Ethical Sourcing Policy
- The design of a questionnaire to enable us to better assess our suppliers for Modern Slavery risk
- Committing to addressing Modern Slavery risk through further building on, and expanding, the following activities to embed them in Australian Agribusiness' broader risk management frameworks:
 - A preliminary risk review of our key supplier network
 - Commenced a staged roll out of our Modern Slavery supplier questionnaire. This is based on risk-based criteria including Modern Slavery risk, country of origin, the goods and services supplied and our expenditure with the supplier.
 - Completed a review of our remuneration practices, including the introduction of competency frameworks, market benchmarking and independent assessment ensuring that our staff are appropriately remunerated.
 - Commenced developing a Modern Slavery training program applicable to all staff that requires staff to review and understand our Modern Slavery and Ethical Sourcing Policy
 - Commenced a review of our procurement policies and procedures to improve all aspects of risk mitigation and ensure that Modern Slavery is appropriately covered
 - Commenced embedding Modern Slavery in Australian Agribusiness' corporate governance.



Criteria 4: Action taken to address Modern Slavery risks

In Our Operations

Area	Description
Policies & Governance	<p>Modern Slavery and Ethical Sourcing Policy developed and issued</p> <p>Employee Code of Conduct requires that all employees fulfil their ethical responsibilities by:</p> <ul style="list-style-type: none"> • Committing to uncompromising integrity in every aspect of our business • Describing how we will do business and our respect for the rule of law • Guiding employees on how to engage in decision making that demonstrates and sustains our commitment to integrity • Outlining how our commitment supports our stakeholders <p>Competency Framework outlines minimum competencies and requirements for each role and ensures that all employees are remunerated consistently and in accordance with the Framework</p>
Training	<p>To complement our Employee Code of Conduct, we have commenced developing a Modern Slavery training program applicable to all staff that requires staff to review and understand our Modern Slavery and Ethical Sourcing Policy</p> <p>Procurement staff and key management have undergone training in respect of Modern Slavery and the Modern Slavery and Ethical Sourcing Policy</p>
Reporting	<p>A whistle blower phone line and email is available for anonymous reporting and people are encouraged to report inappropriate, unethical or illegal behaviour. All reports are investigated.</p>
Recruitment and Remuneration	<p>Processes and procedures are in place to ensure compliance with all applicable workplace relations laws and regulations. Our recruitment processes are fair and free of any form of discrimination or exclusion and are in accordance with Australian Agribusiness' values.</p>



Criteria 4: Action taken to address Modern Slavery risks

In Our Supply Chain

Area	Description
Due Diligence	<p>Group Procurement and business units follow a risk-based approach when determining the due diligence requirement to conduct on a supplier. This is based on factors including the type of goods or services, country of origin and supplier reputation.</p> <p>Suppliers are expected to adhere to Australian Agribusiness' Modern Slavery and Ethical Sourcing Policy and the minimum standards outlines therein.</p> <p>The staged roll out of the Modern Slavery supplier questionnaire on the basis of risk-based criteria which include Modern Slavery risk, country of origin, country of origin, the goods and services supplied and our expenditure with the supplier.</p>
Modern Slavery and Ethical Sourcing Policy	<p>Modern Slavery and Ethical Sourcing Policy developed and issued containing minimum standards for our suppliers.</p> <p>Should a supplier fail to comply with Modern Slavery and Ethical Sourcing Policy or a supplier is not committed to improving its current practices to ensure compliance we will review our relationship with that supplier. This review may result in the implementation of remedial action by Australian Agribusiness up to and including the immediate termination of our relationship with the supplier.</p> <p>We expect all suppliers of goods and services to comply with our Modern Slavery and Ethical Sourcing Policy, all applicable laws, and regulations. Suppliers are expected as a minimum to;</p> <ul style="list-style-type: none"> • Not use any type of forced or bonded labour and comply with the minimum working age • To comply with with all laws regulating wages, overtime compensation and legally mandated benefit • Ensure working hours must comply with applicable local laws • Provide a workplace free from harassment or abuse and be free of any form of discrimination • Provide grievance mechanisms and recourse • Provide a safe working environment that is without risk to health • Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited.
Supplier Questionnaire	<p>Given the large number of suppliers of goods and services to Australian Agribusiness, a risk-based approach has been adopted to prioritise suppliers considered higher risk based upon criteria including: the geographic location of the supplier, the nature of the goods or services supplied and the our annual expenditure with that supplier. A supplier questionnaire has been developed in accordance with this risk-based approach. Suppliers determined to be a priority have been requested to complete the Modern Slavery questionnaire which is assessed upon completion. We will continue the roll out of the supplier questionnaire and expand its contents over time to cover additional compliance risks, in particular anti-bribery and anti-corruption.</p>
Procurement Contracts	<p>Procurement contracts are review by our legal advisors to ensure that our contract manage supply chain risk appropriately. Where absent from contract, we have developed standard clauses requiring compliance with the Modern Slavery Act 2018 and in the future will be incorporating compliance with our Modern Slavery and Ethical Sourcing Policy.</p>



Criteria 5: Assessing the effectiveness of our actions

Australian Agribusiness is committed to assessing the effectiveness of our measures taken to date and seeking out ways in which we can continually improve upon our modern slavery response. We recognise that these steps are important actions to ensure continuous improvement and that they have a meaningful impact on reducing the risk of modern slavery in our operations and supply chains.

Australian Agribusiness is developing key performance indicators (KPIs) that assist in the monitoring of the effectiveness of its actions to prevent and address the risk of Modern Slavery in our operations and supply chains.

We will continue to collate data and take action where considered appropriate, based on the available information provided by its suppliers through questionnaires, due diligence and direct inspection. We will continue to monitor the level of engagement with suppliers in respect of Modern Slavery and track the completion of corrective and mitigating actions where required.

Australian Agribusiness will continue to regularly review and update controls that will impact on Modern Slavery and the associated risks.

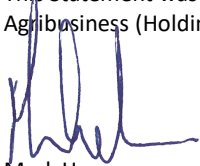


Criteria 6: Consultation and approval

In order to prepare this Statement, we have engaged with each of the Australian Agribusiness reporting entities and consulted with key personnel in each business unit of Australian Agribusiness

This Statement has been reviewed, considered and approved by the directors of each of the Australian Agribusiness reporting entities and key management personnel of Australian Agribusiness.

This Statement was approved by the principal governing body of Australian Agribusiness (Holdings) Pty Limited and signed by Mark Herron, Director and Chief Executive Officer of Australian Agribusiness (Holdings) Pty Limited.



Mark Herron
Director and Chief Executive Officer

Criteria 7: Future actions

As part of its ongoing commitment towards continuous improvement, Australian Agribusiness will continue to develop and improve all of its policies, procedures, requirements, risk assessment and monitoring frameworks including those in respect of Modern Slavery.

Over the course of 2022, we aim to:

- Increase awareness of Modern Slavery risks
- Train and educate employees who are more likely to engage with suppliers from 'higher risk' geographies and sectors;
- Develop and implement a Modern Slavery training program for all employees;
- Further engage with our suppliers to better understand their supply chain risk,
- Review our procurement contracts and documents to ensure that they meet minimum standards related to the mitigation of Modern Slavery risks
- Continue the staged roll out of supplier questionnaires
- Undertake supplier visits in person to conduct direct inspections
- Finalise the implementation of our Competency Framework for employees
- Maintain our current recruitment processes to ensure new employees meet all our employment requirements



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