



Modern Slavery Statement

For the period 1 July 2022 to 30 June 2023

1. INTRODUCTION

This Modern Slavery Statement (“Statement”) for ProTen Pty Limited (“ProTen”) has been prepared in accordance with the Commonwealth Modern Slavery Act 2018 (Modern Slavery Act, 2018). This is a joint statement that has been prepared by and made on behalf of, ProTen and its wholly owned entities, as set out in Appendix 1 of this Statement (the “ProTen Group”). This joint statement covers the period of 1 July 2022 to 30 June 2023.

The ProTen Group is committed to assessing and addressing the risks of modern slavery and human rights within our organisation and throughout our extended supply chain in accordance with our corporate values, its stakeholder expectations, community expectations and the law.

2. WHAT IS MODERN SLAVERY

While there is no globally agreed definition of ‘modern slavery’, the term is widely used to cover a range of practices that use coercion, threats, violence or the abuse of power to exploit and deprive people of their freedom. The Commonwealth’s Modern Slavery Act, identifies the following practices as being types of modern slavery:

- trafficking in persons,
- slavery,
- servitude,
- forced marriage,
- forced labour,
- debt bondage,
- deceptive recruiting for labour or services, and
- child labour (situations where children are subjected to slavery or similar practices or engaged in hazardous work).

3. THE PROTEN GROUP’S STRUCTURE, OPERATIONS AND SUPPLY CHAIN

3.1 Structure

ProTen is a private company domiciled in Australia. All of ProTen’s controlled entities are also incorporated in Australia and operate solely within Australia. The controlled entities are set out in Appendix 1. The company head office is located at Level 11, 99 Mount Street, North Sydney with a regional office in Griffith (NSW) and 48 farms in 13 locations across Australia.

3.2 Operations

ProTen is a leading broiler chicken farm developer and operator in Australia. ProTen owns and operates poultry farms strategically located across Australia. ProTen also leases a free-range chicken farm in WA and a breeder farm in QLD to poultry processors.

ProTen aims to be the market leader in the design, construction, and operation of broiler chicken farms in Australia. ProTen attributes a great deal of its success to the adoption and implementation of a continuous improvement culture that encourages employees and other stakeholders to share new ideas and improved practices. ProTen employs approximately 340 full-time and casual staff within the business across different states in Australia, most of these employees are working in the operation of the farms.

3.3 Supply Chain

The ProTen Group's supply chain includes the products and services listed below. There is a mixture of stable long-term relationships and short term, changeable, supply arrangements.

- processors supplying day old chickens and feed;
- uniforms and Personal Protective Equipment (PPE);
- consulting services (legal, financial, auditing);
- utilities and waste management;
- plant and equipment suppliers and maintenance services (manufacturing, agricultural);
- computer hardware and software;
- travel and accommodation services;
- farm shed construction services (including planning, engineering, marketing, real estate, construction, architectural and professional services);
- offshore manufactured building materials;
- labour hire;
- property cleaning and maintenance; and
- corporate office supplies.



4. THE PROTEN GROUP'S RISKS OF MODERN SLAVERY

4.1 Operations

ProTen operates in the Agricultural sector which falls under the Modern Slavery high-risk sector.¹ ProTen is also in the business of construction (using contract builders) of poultry farms which is approximately 50% of the total spending within its supply chain the construction sector also falls under the Modern Slavery high-risk sector. According to the latest edition of the Global Slavery Index 2023 (GSI), Australia is among the least vulnerable countries to modern slavery in the Asia Pacific and globally, but the GSI still estimates Australia has 41,000 individuals living in Modern Slavery.

As described in the UN Guiding Principles on Business and Human Rights the risk of modern slavery means the potential that ProTen could cause, contribute to, or be directly linked to modern slavery through its operations and supply chains. We recognize this risk exists, given the multifaceted and geographically diverse nature of our business.

The principal risks of modern slavery practices identified for ProTen in the reporting period could arise out of its:

- employment practices (operations and supply chain); and
- procurement practices (supply chain).

4.2 Supply Chain

Our research suggests that high risk areas for ProTen's supply chains include, construction, offshore manufactured building materials, cleaning and labour hire. Accordingly, we have focused on these areas of our supply chain.

We are aware that there could be other risks of modern slavery present in our supply chain, specifically related to the supply chains of electronic equipment. In order to manage these risks, we only work with reputable suppliers and brands.

A secondary assessment was done on organisations that could be deemed as high risk, such as contractors that may hire migrant labour. While we conducted the assessment of these organisations, this was deemed lower risk than initially thought, as our operations are Australia-based and use Australia-based companies.

4.3 Human Resources

ProTen's Human Resource (HR) department is responsible for defining and overseeing the frameworks, behaviours and practices that ensure that the people who work for us prospectively, current and former are treated with respect, fairness and according to all relevant legislation.

Amongst other things, this is articulated in our employment instruments, employment contracts, policies and benefits. As we work for an organisation that is constantly growing, in an industry that is considered in the high-risk sector, these are all regularly reviewed and are subject to robust governance processes that constantly strive to expand our due diligence and remediation efforts in assessing and addressing any internal modern slavery risks. Our HR Policy Framework is the core mechanism for ensuring that we address any modern slavery risks and this is subject to regular scrutiny from our HR and Executive team through to the Board of Directors.

¹ <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

All ProTen employees are entitled to their rights as per their respective employment agreements, subject to any awards, the National Employment Standards and all relevant employment legislation. The HR team contains specific capabilities around employee relations; industrial relations; and employee rights and also uses external experts where needed to ensure ProTen upholds its high standards around managing any risk of this kind.

The diversity of our workforce, the strength that comes from this diversity and an inclusive culture that celebrates and leverages this diversity through inclusive practices are best placed to serve our stakeholders. This is supported by leadership and employee inclusion awareness initiatives and the expectation that our leaders apply constant effort to monitor and ensure non-discriminatory, fair, unbiased, equitable and inclusive outcomes for all people at every stage of their career and life stages with ProTen.

ProTen always aims to do the right thing and has identified some potential risks that could exist in people processes that may affect our employees. Following is a list of non-exhaustive modern slavery risks which we aim to eradicate:

- Forced/bonded labour
- Unfair recruitment practices
- Dangerous or substandard working conditions
- Underpayments
- Unfair or excessive hours of work
- Bullying, discrimination and harassment
- Not providing contracts of employment
- Deceptions regarding conditions of employment
- Suppressing employee rights and entitlements

We are committed to taking action to address modern slavery risks that might exist in our people processes and approaches. Some of the actions we are taking are set in the next section.

5. ASSESSING THE PROTEN GROUP'S MODERN SLAVERY RISK

5.1 Governance and Policies

The following aspects of our governance framework are also relevant to our commitment to human rights which includes several policies that address Modern Slavery either directly or indirectly. Our employee training covers the identification of human rights-related risks and how employees can report suspected breaches of our requirements. Actions taken to mitigate modern slavery risks in our operations and supply chain include:

- regular reviews of our existing policies, procedures, and working documents to ensure they address standards of professional conduct, and responsible business fundamentals, including human rights and ethics;
- inclusion of these policies and procedures in ProTen onboarding process for acknowledgment by each new employee, as well as formal notification to all personnel of any updates made to our suit of policies and procedures;
- utilising modern slavery contractual controls in contracts with suppliers and other third-party business partners that are proportionate to that party's risk profile;
- obtaining high-calibre external legal advice on operational and supplier matters.

We aim to eliminate the risks of modern slavery through robust practices via the following policies and procedures:

5.1.1 Discrimination, Harassment, Bullying and Grievance Policy

- create a working environment that is free from unlawful discrimination, harassment, sexual harassment, bullying, vilification and victimisation and where all workplace participants are treated with dignity, courtesy and respect;
- implement awareness-raising strategies to ensure that all workplace participants know their rights and responsibilities. Among other things, this may include training, providing copies of the policy to employees and discussion at meetings;
- ensure workplace participants are treated fairly based on merit and not based on irrelevant personal characteristics such as their age, sex, race or disability;
- provide a comprehensive procedure for dealing with complaints of harassment, sexual harassment, discrimination, vilification, victimisation and/or bullying if they occur;
- explain the procedure to follow if there is a suspected breach of this policy and encourage reporting of suspected breaches;
- treat all complaints in a sensitive, fair, timely and discreet manner;
- prevent victimisation or reprisals; and
- promote appropriate standards of conduct at all times.

5.1.2 Whistleblower Policy

- how to raise concerns about suspected or actual unethical or unlawful behaviour at work and outlines how ProTen will deal with reports of serious wrongdoing.
- sets out the avenues available to staff to raise concerns regarding any serious wrongdoing (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to victimisation, harassment or discriminatory treatment. The avenues include both internal and external options for escalation

5.1.3 Mental Health and Well-being Policy

- build and maintain a workplace environment and culture that supports mental health and wellbeing and prevents discrimination (including bullying and harassment).
- foster a collaborative and open culture allowing managers and employees to discuss mental health issues.
- support management understanding of their role in managing mental health at work, and the link between performance management and mental health issues.
- reduce the stigma around depression and anxiety in the workplace.
- provide an understanding to employees that early access to the Employee Assistance Program (EAP) can be beneficial in managing mental health issues.
- enable earlier access to the Employee Assistance Program for employees feeling the effects of stress at home and in the workplace to enable improved management of their case.

5.2 Operations

As outlined in section 4.1, ProTen's operations are exposed to high-risk sectors for Modern Slavery (Agriculture and Construction). The Modern Slavery risks in ProTen's operations are managed by the following actions:

- A majority of people working in our operations are directly employed under the respective awards and legislations, on above-award wages.
- All our salaried people are employed directly under the terms of individual employment agreements.
- All employees remain subject to the minimum conditions in the National Employment Standards. These minimum conditions are supported by a range of additional benefits, such as flexible work arrangement policy, parental leave policy, salary packaging policy and service recognition.
- Our recruitment policy has strict governance. Employment decisions are based on the principle of merit, with no instances of forced labour.
- All employees must demonstrate their legal right to work in Australia and our HR department also does a VEVO check to support ease of collection, validation and tracking of working rights on an ongoing basis.
- ProTen engages labour-hire firms to supply supplementary labour in our operations and conducts regular audits of labour-hire companies that provide staff for our operations. To date, we have not found any labour-hire firms with any non-compliance with modern slavery practices.
- Prominent signage has been installed on all of our farms advising people to contact payroll at ProTen Head Office on 02 9458 1700 if they believe they are being underpaid.

5.3 Supply Chain

All material suppliers (>\$60k, 95% of total ProTen purchasing) were assessed to identify and target any potential high-risk suppliers. There are approximately 20% of suppliers that supply 95% of goods and services to ProTen across the entire operations. We assessed each supplier against four key risk factors:

- sector and industry risk;
- product & services risk;
- geographic risk; and
- entity risk.

Out of 796 suppliers, we identified 33 suppliers that were high risk compared to 12 in the last reporting year.

A survey was sent out to any additional high-risk suppliers and most of these were either labour hire or cleaning service providers with specific questions around:

- type of service or product;
- whether the supplier outsources or manufactures within any high-risk countries in order to provide the service or product;
- the type of policies that were in place targeting modern slavery in their supply chain;
- training provided to employees on modern slavery and human trafficking in supply chains;

- types of due diligence that the organisation conducts on their supply chain to address modern slavery;
- any offshore activities in any countries not listed as high risk.

During this process, we identified suppliers providing labour and cleaning services had a high residual risk. Our risk management and operations team were made aware of these suppliers and some of these suppliers either stopped providing their services or ProTen no longer use them. Current suppliers with high residual risks for example labour hire and cleaning services providers go through an audit process where our HR team reviews payslips and working conditions to ensure no non-compliance.

We have an ongoing process to assess our current suppliers as well as any new suppliers for any potential or residual risk. If and when a new supplier is identified as potentially high-risk a survey is sent out and once the response is received, an assessment of residual risk is conducted. Our risk management and operations team will be made aware of any suppliers who have a residual high risk.

6. ASSESSING THE EFFECTIVENESS OF THE PROTEN GROUP'S ACTIONS

The ProTen Group recognises that it will take time and effort globally to address modern slavery and will continue to develop its monitoring plan to identify whether modern slavery occurs within our supply chain. Many businesses within our supply chain and operations are also going through a process of developing programs to mitigate modern slavery risks.

We are committed to continually improving our processes to effect positive change to proactively manage modern slavery risks in our people and supply chain. This is supported by increasing our resources in the HR department and our supplier relationship management program to manage medium to high-risk suppliers.

7. CONSULTATION PROCESS

ProTen prepared this modern slavery statement in consultation with the relevant executives, directors and officers of all the ProTen entities. Externally, we work with supply chain partners, labour providers, customers, industry bodies and other enforcement bodies to ensure the risk of modern slavery is minimised. All ProTen executives and directors were provided with an opportunity to review the statement prior to its approval.

8. OTHER RELEVANT INFORMATION

Many businesses within our supply chain and operations are continuing to evolve programs to mitigate modern slavery risks. Likewise, ProTen's own program will continue to evolve focusing on consistent improvement. We have identified the following areas for development over the next 12 months:

- Further engagement with our suppliers based on their responses to our questionnaire, to both educate and support our suppliers in developing and refining their approach to exposure of identified modern slavery risks.
- The onboarding questionnaires that currently comprise the Supplier Assessment Program will be updated in this period to include a section on the management of human rights, which will assist in the initial risk assessment process during the annual review and before onboarding. Depending on these responses, the supplier may be subject to third-party audit and/or be subject to shorter-term contracts that are subject to more regular review and renewal.

- Suppliers will be onboarded going forward with the increased scrutiny within this process. This is intended as a holistic project, including but not limited to modern slavery, which will drive ethical and sustainable outcomes that are designed to be business as usual under ProTen's ESG activities.
- Supply chain mapping of all suppliers that incorporates the country of all operations (not just the country of incorporation) and consideration of supply chains that extend beyond our direct suppliers.
- Provide ongoing staff training to identify and prevent modern slavery in our business and supply chain.
- Continuous reviewing and overseeing the frameworks, behaviours and practices that ensure that the people who work for us – prospective, current and former – are treated with respect, fairness and according to all relevant legislation. This is to be articulated in our employment instruments, employment contracts, policies and benefits to assess and address any internal modern slavery risks.

9. APPROVAL

This statement is made pursuant to section 13(1) of the Modern Slavery Act (Commonwealth) 2018. It constitutes the statement of the ProTen Board of Directors for the year ended 30 June 2023 and has been approved by the Board of ProTen Pty Limited.



Robyn Clubb
Chairwoman

PROTEN PTY LIMITED - SUBSIDIARIES	ABN	ACN
ProTen Holdings Pty Ltd	98 437 402 706	100 327 357
ProTen Tamworth Pty Ltd	12 109 715 513	109 715 513
ProTen Investment Management Pty Ltd	NA	124 095 030
ProTen Investment Trust	82 526 039 988	NA
ProTen South Australia Pty Ltd	NA	625 942 065
ProTen Broiler Trust	29 490 047 563	NA
ProTen Hanwood and Lethbridge Pty Ltd	NA	636 020 249
ProTen Hanwood and Lethbridge Trust (Formerly Chicken Income Fund)	77 448 559 735	NA
ProTen Custodian Pty Ltd	NA	639 065 866
ProTen Queensland Trust	47 806 108 062	NA
ProTen Western Australia Pty Ltd	NA	642 505 217
ProTen Western Australia Trust	17 707 600 274	NA
ProTen Victoria Pty Ltd	NA	642 438 319
ProTen Victoria Trust	18 422 893 254	NA