



# Summit Rural (WA) Pty Ltd

## Modern Slavery Statement

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) by Summit Rural (WA) Pty Ltd ABN 49 058 794 737 (SRWA) for the period between 1 April 2020 to 31 March 2021.

### **Our stance against modern slavery**

SRWA is committed to conducting business responsibly and ethically and to ensuring that all aspects of our business practices, including our supply chains, are free from any form of slavery. We reject any and all forms of modern slavery which can take the form of unpaid or underpaid servitude, human trafficking and forced labour. SRWA is committed to implementing effective systems and controls to ensure that it does not take place within our own business or through any of our supply chains.


### **Our organizational structure and operations**

SRWA is an importer, manufacturer, and distributor of granular fertilizer within Western Australia, with 5 locations across the state. We supply fertilizer as well as offer a range of services, which includes soil and plant analysis and fuel gauges, amongst others. We are proprietary limited company and do not own or control any other entities and therefore criteria 6 is not applicable.

### **Our supply chain**

We operate an importing and distribution platform with our network of depots across Western Australia. SRWA currently has both domestic and overseas suppliers. They supply raw materials, shipping services, transportation, equipment and services to maintain the depots as well as the usual office related services. Arrangements with suppliers are a mixture of one-off purchases and longer-term contracts.

SRWA recognises that there are parts of our supply chain that may have a higher risk of being directly linked to modern slavery. These include goods and/or services procured by SRWA which



are linked to high risk industries, are high risk products themselves or are in high risk countries. Supplier location is one of the considerations made when sourcing our fertilizer and also one of the higher risk areas regarding modern slavery. We have suppliers located in Asia, the Middle East, North America, and Europe, as well as domestically in Australia.

## **Our operations**


SRWA considers the risk of modern slavery within its operations to be low and there has been minimal impact upon the business by COVID-19. Agriculture and all agricultural input industries (which includes fertilizer) were declared an essential service on 25 March 2020 by David Littleproud, MP, the Minister for Agriculture, Drought and Emergency Management. As such, there are less business interruptions regarding COVID-19 related restrictions. There have been no significant impacts upon the existing supply chain or suppliers, other than increased costs associated with sea freight for imported goods. This is due to basic supply and demand dynamics amidst the COVID-19 global situation.

All employees can raise concerns about modern slavery in a confidential manner. Should an occurrence or potential occurrence of modern slavery be identified, either internally related to employment practice or working conditions, or externally within the supply chain, then appropriate corrective action shall be taken in line with the Company's response plan which forms part of the Company's Modern Slavery Procedure.

## **Our policies and approach to Governance**

SRWA is committed to working towards preventing and mitigating risks of modern slavery in its operations and supply chains. During this financial year the actions taken included:

- Continued to review all 1400 existing suppliers at the time the modern slavery policy was established:
  - risk assessment (based on geographic, product/services and industry specific risk) carried out by appropriate department executive manager
  - further desk top due diligence carried out for those with any risk indicators
  - supplier contacted and initial request for Modern Slavery policy or statement
  - supplier questionnaires sent to those suppliers deemed high risk

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- preparing clauses relating to modern slavery for new contracts with suppliers
  - communication with suppliers, electronically or face to face if possible, to discuss modern slavery as required
  - All new suppliers were reviewed for modern slavery risks, as per the onboarding system, and the same process followed as mentioned above for existing suppliers
  - Reported on modern slavery project status and statistics to executive management team
  - Reported on statistics captured per ERP system on number of new suppliers and number of completed modern slavery reviews
  - Team meeting to discuss/continue review of modern slavery processes and effectiveness

The initial review started in 2020 is nearly completed and all suppliers have now been contacted and desk top due diligence work carried out for each supplier. For those still deemed a higher risk after the desk top due diligence, an additional questionnaire has been sent to the supplier. There are a number of outstanding questionnaires from overseas suppliers and there is ongoing communication. These suppliers cover both product supply and freight services supply. For all other suppliers where the initial review has been completed, there have been no reports of breaches with the Modern Slavery Act.


In addition, the principal objectives of SRWA's Modern Slavery policy are delivered through associated policies and procedures, such as:

- Compliance Policy and Compliance Manual
- Whistleblowing Policy and Whistleblowing Procedure

The policies apply to all people working for or behalf of SRWA in any capacity, including employees, directors, officers, agency workers, contractors, consultants, and any other third-party representatives. SRWA is committed to ensuring all staff are kept up to date with ongoing training and updates in all areas stated above.

### **Assessing effectiveness**

The effectiveness of steps taken to address modern slavery risks in our business and supply chains have been assessed for the current reporting period.

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- Processes for new suppliers when onboarding are working well and have assisted in engagement and awareness of modern slavery issues for both staff and suppliers.
  - Review of existing overseas suppliers has some outstanding questionnaires. Communication regarding this is ongoing.

SRWA continues to have the following procedures in place to measure its effectiveness in ensuring that slavery is not taking place in any of its business or supply chains:

- An annual review of modern slavery statement and policies
- Communication and personal contact, where feasible, with domestic suppliers to ensure their understanding of, and compliance with our expectations
- Communication (electronic only due to COVID-19) with overseas suppliers to ensure their understanding of, and compliance with, our expectations

#### **Plan for remediation**

There were no remediation requirements for this reporting period. SRWA continues to consider the remediation processes.

#### **Our ongoing commitment**

Over the next year SRWA will focus on:

- Completion of obtaining completed questionnaires from overseas suppliers
- Establish a modern slavery clause suitable for insertion into contracts if required
- Review and update the Modern Slavery Policy and Procedure documents as required
- Ensure all relevant staff are fully trained on areas relating to Modern Slavery as required

This statement was approved by the Board of Summit Rural (WA) Pty Ltd on 9 September 2021



Masafumi Tokui, Chairperson, 16 September 2021