



Modern Slavery Policy

Purpose

Modern Slavery is a crime and violation of human rights and is defined under the Australian *Modern Slavery Act 2018 (the Act)* as including eight types of serious exploitation:

- trafficking in persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; and
- the worst forms of child labour which means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

The purpose of this Policy is to:

- prevent, detect and respond with mitigating controls to the risk of Modern Slavery occurring within Southern Australian International Livestock Services Pty Ltd (SAILS), its supply chain or in any other business relationships;
- demonstrate SAILS commitment to only doing business with those who fully comply with the Act; and
- ensure compliance with the Act (as may be amended from time to time).

Scope

This policy applies to all persons working for and with SAILS or on its behalf in any capacity, including employees, directors, officers, volunteers, interns, external consultants, third-party representatives, and business partners.

Policy Statement

SAILS has a zero-tolerance approach to Modern Slavery.

SAILS is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in its own business operations or supply chains.

SAILS is also committed to ensuring there is transparency in its approach to tackling Modern Slavery throughout its business and supply chains, consistent with SAILS's disclosure obligations under the Act.

The prevention, detection and reporting of Modern Slavery in any part of SAILS business and supply chains is the responsibility of all those working for it or under its control.

Employees who also include contractors, are encouraged to raise concerns with their manager or Director Governance, about any likely Modern Slavery breaches in any parts of SAILS's supply chains or business, at the earliest possible stage.

SAILS expects the same high standards from all of its contractors, suppliers and other business partners. SAILS's contracting processes will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect suppliers to hold their own suppliers to the same high standards.

Policy Program

SAILS Modern Slavery program contains the following elements:

1.Policies

SAILS currently operate the following policies that support awareness of acceptable practice and behaviour; and the reporting mechanisms to raise concerns of inappropriate behaviour:

- Whistleblowing Policy
- Staff Personal and Professional Employee Code of Conduct.

2.Procedures

SAILS will meet the requirements under the Modern Slavery Act in three ways:

Procurement of goods and services (Procurement Policy and Procedure)

The procurement framework is the key mechanism whereby suppliers are engaged by SAILS. The procurement framework provides for due diligence on these suppliers and their compliance with the Act. Procuring goods and services will, as far as reasonable, be conducted in a way as to ensure that SAILS sources goods and services from entities that comply with their obligations under the Act. The extent of the due diligence conducted in the procurement process will depend on the types of goods or services being sourced, and the geographical region they are being sourced from.

Some examples of the due diligence that may be conducted include requesting:

- self-assessment/attestation that the supplier complies with various provisions in the Act;
- a copy of the supplier's most recent Modern Slavery statement(if applicable);
- details of structure and operations of their supply chain; and/or
- details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain. If a proposed contract is included as part of the procurement, consideration must be given to a provision ensuring compliance with the Act.

Contract management and monitoring key suppliers/offshore partners

The adoption of anti-slavery wording in contracts to cover compliance with the Act. The obligations in the clause to include:

- Obligation to comply with the Act;
- Requirements to take reasonable steps to ensure that there is no modern slavery in the contractors supply chains or any subcontractor's supply chains; and
- Requirement to notify SAILS if the supplier becomes aware of any actual or suspected breach of the Act.

SAILS will work collaboratively with key suppliers/business partners to identify and manage modern slavery risks and develop commercial and actionable solutions.

Supply Chain Risk Assessment

SAILS has assessed the risk of modern slavery in our operations and supply chain as low. Legislative and industrial frameworks govern and regulate SAILS employment conditions and all employees are employed under modern awards, individual employment agreement or employment contract that exceeds minimum employment conditions. These instruments contain protective measures to ensure we comply with our industrial relations obligations which include preventing modern slavery practices.

Our supply chain is principally based in Australia where we only source animals from farming businesses bound by Australian labour laws. Our greatest risk is the use shipping companies with vessels flagged in foreign countries. All of the shipping companies we engage have Modern Slavery policies within their businesses that they comply with and make available to their customers.

Consultation

SAILS controls the entity "SAILS Rural Holdings Unit Trust". This entity is not engaged in operations or trading activity as a holding trust and is therefore not exposed to the risks of modern slavery.

Statement Preparation, Endorsement and Approval

The Act requires that an annual statement be prepared and approved for each financial year where the Company has a revenue of at least \$100 million. Where required, the annual statement will be approved by the Board and signed by a member of the Board.

Board Approval and Signature

This statement was approved by the Board of Southern Australian International Livestock Services Pty Ltd (SAILS) in their capacity as principal governing body of Southern Australian International Livestock Services Pty Ltd (SAILS) on 7th December 2023.

This statement is signed by Andy Ingle in his role as Managing Director of Southern Australian International Livestock Services Pty Ltd (SAILS) on 7th December 2023.



Andy Ingle
Managing Director of Southern Australian International Livestock Services Pty Ltd (SAILS)

7th December 2023