

# Modern Slavery Statement

**Reporting Period:** FY2025 - 1 July 2024 to 30 June 2025

**Entity:** ProTen Pty Ltd (ABN: 80 109 715 488)

*This Statement has been approved by the Board of ProTen Pty Ltd on Monday 8 December 2025.*

*This statement is signed by James Wentworth as Chief Executive Officer on 8 December 2025.*

## 1. Introduction - Criteria 1 – Identify the reporting Entity

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 FY2025 - 1 July 2024 to 30 June 2025.

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.

The 7 mandatory criteria require every statement to:

1. identify the reporting entity
2. describe the reporting entity’s structure, operations and supply chains
3. describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
4. describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
5. describe how the reporting entity assesses the effectiveness of these actions
6. describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement), and
7. provide any other relevant information.

## 2. Criteria 2 – describe the reporting entity’s structure, operations and supply chains

### 2.1. 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 NSW and there are 2 regional offices located in Griffith, NSW and Adelaide, SA.

ProTen owns and operates 720+ poultry sheds across over 62 broiler farms strategically located in New South Wales, Victoria, South Australia, Western Australia and Queensland. Our farms have the capacity to produce over 174 million broiler chickens annually, contributing approximately 25% of Australia’s total broiler chicken production.

### 2.2. 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 & breeder 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.

### 2.3. Our People

ProTen's leadership structure comprises a Board of Directors supported by the Chief Executive Officer (CEO) and a Senior Leadership Team overseeing key business functions, including Operations, Production, Finance, Human Resources, Safety, and Compliance. This team provides strategic oversight and ensures the effective management of ProTen's farming operations across Australia.

As at the time of preparing this report, ProTen employs approximately **393 employees** across multiple states, with the majority working directly in operational roles on our farms. Our workforce is made up of:

- **Full-time employees:** 274 (70%)
- **Part-time employees:** 7 (2%)
- **Casual employees:** 111 (28%)

ProTen's employees are distributed across Australia as follows:

- **New South Wales:** 201
- **Queensland:** 29
- **South Australia:** 60
- **Victoria:** 46
- **Western Australia:** 34

ProTen continues to foster a diverse workforce. At the time of reporting, our gender representation is:

- **Male:** 295 (75%)
- **Female:** 98 (25%)

In addition to our directly engaged workforce, ProTen supplements its labour needs through reputable, approved labour hire providers, particularly during peak operational periods or when specialised skills are required.

ProTen remains committed to providing a safe, inclusive, and supportive workplace and continues to uphold a culture that values fairness, diversity, and the wellbeing of all employees.

### 2.4. Our Supply Chain

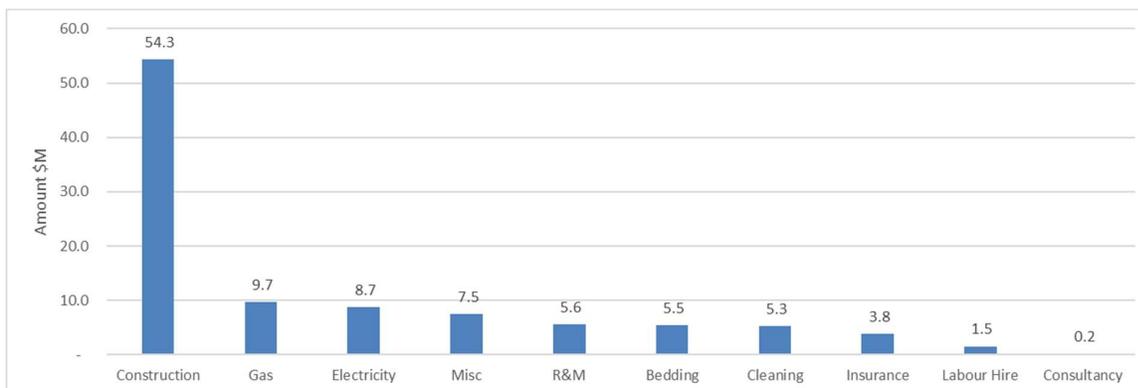
The ProTen Group's supply chain consists of a combination of long-term, stable supplier relationships and shorter-term, flexible arrangements. During the reporting period, ProTen engaged with a diverse range of suppliers across Australia and internationally, covering both products and services critical to our operations.

Key supply chain categories include:

- Processors supplying day-old chickens and feed
- Uniforms and Personal Protective Equipment (PPE)
- Consulting services, including legal, financial, auditing, planning, engineering, marketing, real estate, construction, architectural, and other professional services
- 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
- Offshore manufactured building materials
- Labour hire
- Property cleaning and maintenance
- Corporate office supplies

The majority of ProTen's suppliers are based in Australia and have been part of our supply chain for multiple years, with many relationships maintained over a decade. A small number of suppliers are located internationally, primarily providing building materials or specialized equipment.

All suppliers are expected to comply with ProTen’s approved supplier process, which includes adherence to our standards for ethical business practices and legal compliance. These processes are part of ProTen’s ongoing efforts to manage supply chain risks and ensure responsible sourcing of products and services.



### 3. Criteria 3 – describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

#### 3.1. Operations

ProTen operates in the agricultural sector, which is recognised as a higher-risk industry for modern slavery. In addition, ProTen undertakes construction of poultry farms through contract builders, representing approximately 54% of total supply chain spend; the construction sector is also classified as high-risk under the Modern Slavery framework.

While Australia is considered among the least vulnerable countries globally—according to the **Global Slavery Index 2023**, it is estimated that approximately 41,000 people in Australia are living in modern slavery—ProTen acknowledges that the risk of modern slavery exists. Consistent with the **UN Guiding Principles on Business and Human Rights**, this risk reflects the potential that ProTen could cause, contribute to, or be directly linked to modern slavery through its operations and supply chains.

Within ProTen’s operations, the principal risks of modern slavery identified during the reporting period are related to:

- **Employment practices** – including recruitment, engagement, and ongoing management of staff both directly and through labour hire arrangements.
- **Procurement practices** – including sourcing of goods and services across a geographically and operationally diverse supply chain.

#### 3.2. Supply Chain

ProTen’s supply chain comprises a range of products and services essential to its operations, including high-risk categories such as construction, offshore-manufactured building materials, cleaning, and labour hire. These areas have been prioritised for risk assessment and management during the reporting period.

Additional potential risks may exist in other supply chain categories, such as electronic equipment. To mitigate these risks, ProTen engages only with reputable suppliers and established brands.

A secondary review was undertaken of suppliers and contractors that could be considered higher-risk, such as organisations employing migrant labour. This review determined that, due to ProTen’s Australian-based operations and use of Australian suppliers, the actual risk was lower than initially anticipated.

ProTen is also aware of other forms of labour exploitation that, while not constituting modern slavery, can indicate risk within operations and supply chains. These include:

- Forced or bonded labour
- Unfair recruitment practices
- Dangerous or substandard working conditions
- Underpayments or wage violations
- Unfair or excessive working hours
- Bullying, discrimination, and harassment
- Failure to provide employment contracts
- Misrepresentation of employment conditions
- Suppression of employee rights and entitlements

ProTen is committed to understanding, preventing, and addressing these risks as part of its broader approach to ethical employment and responsible supply chain management. Actions taken to mitigate these risks are outlined in the following section.

#### **4. Criteria 4 – describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes**

##### **4.1. Governance and Policies**

ProTen maintains a robust governance framework to address human rights and modern slavery risks across its operations and supply chain. Several policies and practices directly or indirectly support the prevention of modern slavery, and annual employee training covers the identification of human rights-related risks and reporting mechanisms for suspected breaches.

Key actions to mitigate modern slavery risks include:

- Regularly reviewing policies, procedures, and operational documents to ensure alignment with ethical business practices, human rights, and responsible conduct.
- Implementing modern slavery contractual controls with suppliers and third-party partners, proportionate to the party's risk profile.
- Seeking high-quality external legal advice on operational and supplier matters where appropriate.
- Participating in customer modern slavery audits and assessments to ensure continuous compliance and improvement.

##### **4.2. Human Resources**

ProTen's Human Resources (HR) department oversees frameworks, behaviours, and practices to ensure all employees—prospective, current, and former—are treated with respect, fairness, and in compliance with relevant legislation.

Our HR Policy Framework underpins ProTen's approach to managing modern slavery risk, ensuring employment instruments, contracts, policies, and benefits are aligned with ethical and legal standards. This framework is reviewed regularly by HR, the Executive team, and the Board of Directors to expand due diligence and remediation measures.

All employees are entitled to their rights under employment agreements, awards, the National Employment Standards, and relevant legislation. HR staff possess expertise in employee relations, industrial relations, and employee rights and engage external experts as required to ensure compliance with high standards. ProTen also promotes workforce diversity and an inclusive culture, supported by leadership and employee inclusion training. Leaders are expected to monitor and ensure fair, equitable, and non-discriminatory outcomes for employees throughout their careers.

Key HR Policies Supporting Modern Slavery Risk Management:

- **Discrimination, Harassment, Bullying, and Grievance Policy:** Ensures a workplace free from discrimination, harassment, bullying, or victimisation, with clear procedures for reporting and addressing breaches.

- Whistleblower Policy: Provides avenues for raising concerns about unethical or unlawful behaviour without fear of retaliation.
- Mental Health and Wellbeing Policy: Supports employee wellbeing, fosters an open culture, and provides early access to the Employee Assistance Program (EAP) for mental health support.

#### 4.3. Operations

ProTen's operations are primarily in high-risk sectors for modern slavery (Agriculture and Construction).

Risk management measures include:

- Inclusion of modern slavery in the Board Risk Register, reviewed periodically.
- Direct employment under relevant awards and legislation, with above-award wages where applicable.
- Employment contracts for salaried staff, ensuring compliance with National Employment Standards.
- Additional benefits such as flexible work arrangements, parental leave, salary packaging, and service recognition.
- Merit-based recruitment practices, with no instances of forced labour.
- Verification of legal work rights through VEVO checks.
- Prominent farm signage advising employees on how to report suspected underpayments.

#### 4.4. Supply Chain

ProTen assessed its material suppliers to identify and address high-risk suppliers. Approximately 20% of suppliers provide 91.5% of goods and services across ProTen's operations.

Suppliers were assessed against four key risk factors:

- Sector and industry
- Products and services
- Geographic location
- Entity-specific risk

Out of 809 suppliers, **12 were identified as high-risk** during the reporting period, down from 16 in the previous year. High-risk suppliers primarily included labour hire and cleaning service providers.

High-risk suppliers underwent a detailed survey covering:

- Type of service or product provided
- Outsourcing or manufacturing in high-risk countries
- Policies addressing modern slavery in their supply chain
- Employee training on modern slavery and human trafficking
- Due diligence processes
- Offshore activities outside of identified low-risk regions

Following assessment, some suppliers ceased providing services or no longer used high-risk labour. Remaining high-risk suppliers undergo audits to review payslips and working conditions, ensuring compliance with legal and ethical standards.

ProTen maintains ongoing monitoring of all suppliers and conducts assessments of new suppliers for potential modern slavery risks. Any supplier identified as high-risk is flagged to the Finance and Operations teams, and residual risk is continually reviewed.

### 5. Criteria 5 – describe how the reporting entity assesses the effectiveness of these actions

#### 5.1. Measuring Effectiveness

ProTen recognises that addressing modern slavery is an ongoing process that requires continuous monitoring and improvement. To assess the effectiveness of our actions, ProTen:

- Monitors compliance with policies, procedures, and employment frameworks through the HR team and Executive oversight.
- Reviews supplier relationships, particularly medium- to high-risk suppliers, to ensure alignment with modern slavery expectations and ethical business practices.

- Uses monthly statutory declarations, annual audits, and direct engagement to assess labour hire providers, verifying working conditions, payslips, and adherence to Australian employment laws.
- Maintains ongoing evaluation of operations to identify potential labour exploitation risks and ensures employees are aware of reporting mechanisms and support resources.

Through these measures, ProTen aims to detect potential modern slavery risks early and take appropriate actions to mitigate them.

## 5.2. Future Commitments and continuous improvement

ProTen is committed to continuously improving its approach to preventing and addressing modern slavery. Key focus areas for the upcoming reporting period include:

- Ongoing training programs on modern slavery risk identification and mitigation.
- Ongoing engagement with suppliers to communicate expectations regarding social compliance and modern slavery, including periodic review of the supplier onboarding process and review of onboarding questionnaires. High-risk suppliers may be subject to third-party audits or shorter-term contracts with more frequent review.
- Ongoing audits of labour hire providers to ensure compliance with legal and ethical standards.
- Continued refinement of employment policies and operational procedures to strengthen protections for employees and promote responsible business practices throughout the supply chain.
- ongoing review of employment frameworks, behaviours, and practices to ensure all employees- prospective, current, and former-are treated with respect, fairness, and according to relevant legislation.

Through these initiatives, ProTen seeks to proactively manage modern slavery risks and foster ethical, fair, and safe working environments for all employees and contractors, while supporting its suppliers in developing responsible practices and mitigating potential risks.

## 6. Criteria 6 – describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)

This Modern Slavery Statement was prepared in consultation with the relevant executives, directors, and officers of all ProTen entities. Externally, ProTen engages with supply chain partners, labour providers, customers, industry bodies, and other relevant stakeholders to ensure that the risk of modern slavery is identified and minimised.

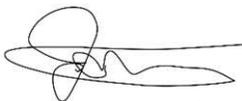
Relevant stakeholders were provided with the opportunity to review the statement prior to its approval by the Board. Ongoing review and continuous improvement of modern slavery practices are conducted through a consultative process across all functions of the business.

## 7. Criteria 7 – provide any other relevant information.

All relevant information has been provided under each of the above criteria

## 8. Approval.

This Modern Slavery Statement has been reviewed and approved by the Board of Directors of ProTen Group on Monday 8 Decemebr 2025 and has been signed by James Wentworth as Chief Executive Officer.



James Wentworth  
CEO - ProTen