

Modern Slavery Statement
For the period 1 July 2021 to 30 June 2022

1. INTRODUCTION

This is the first Modern Slavery Statement (“Statement”) that ProTen Pty Limited (“ProTen”) has 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 2021 to 30 June 2022. The ProTen Group is committed to assessing and addressing the risks of modern slavery and human rights within its organisation and throughout its extended supply chain in accordance with its corporate values, its stakeholder expectations, community expectations and the law.

2. THE PROTEN GROUP’S STRUCTURE AND OPERATIONS

ProTen is a leading broiler chicken farm developer and operator in Australia. ProTen owns and operates poultry farms strategically located in New South Wales, Victoria, South Australia, Western Australia and Queensland. 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. There are approximately 300 workers within the business across over 50 sites within Australia.

3. 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
- the worst forms of child labour (situations where children are subjected to slavery or similar practices or engaged in hazardous work).

4. THE PROTEN GROUP’S 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;
- consulting services (planning, engineering, marketing, real estate, construction, architectural and professional services);
- labour hire;
- property maintenance; and
- corporate office supplies.

Our research suggests that high risk areas for ProTen's supply chains include 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 Australian-based and use Australian-based companies.

5. ASSESSING THE PROTEN GROUP'S MODERN SLAVERY RISK

All material suppliers (>\$43k, 95% of total ProTen purchasing) were assessed in the first instance to identify and target any potential high-risk suppliers. We assessed each supplier against four key risk factors:

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

Out of 634 suppliers, we identified 12 suppliers that were high risk.

A survey was created that was sent out to all high-risk suppliers 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.

Once the responses were received, we determined whether any supplier had a high residual risk. Our risk management and operations team were made aware of these suppliers and most of these suppliers stopped providing their services and are no longer used.

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 may occur within the supply chain. Many businesses within our supply chain and operations are also going through a process of developing programs to mitigate modern slavery risks.

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. ProTen conducts regular audits of labour hire companies who provide staff to ProTen.

ProTen has a number of policies that address Modern Slavery either directly or indirectly including Procurement Policy, Whistleblower Policy and Discrimination Harassment Bullying and Grievance Policy.

7. CONSULTATION PROCESS

ProTen prepared this modern slavery statement in consultation with the relevant executives, directors and officers of all the ProTen entities. All 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
- Where appropriate seek to include clauses dealing with Modern Slavery in contracts with at-risk suppliers
- Incorporating further controls within our supplier operations processes to ensure that ProTen and its suppliers enhance the effectiveness of our modern slavery risk assurance program. This includes 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 staff training to identify and prevent modern slavery in our business and supply chain.
- Defining 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 our benefits in an effort 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 2022 and has been approved by the Board of ProTen Pty Ltd.



Robyn Clubb
Chairwoman

Appendix 1 – The ProTen Group

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