

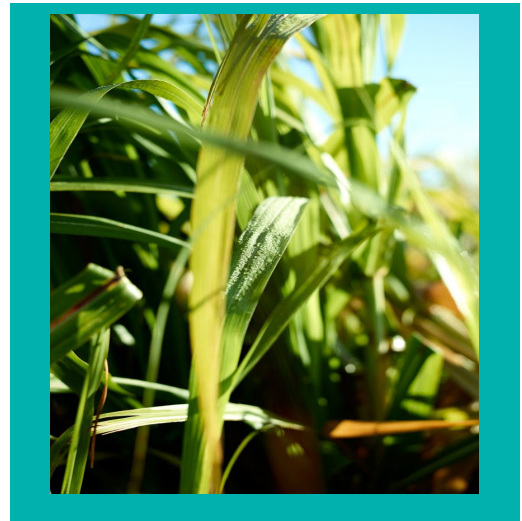
# Modern Slavery Statement



*This statement covers the activities of Finasucre Investments (Australia) Pty Limited ACN 062 315 593 (FIA) and its subsidiaries to understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chains.*

## Introduction

The Australian Government's Modern Slavery Act 2018 aims to assist Australian businesses in identifying and addressing modern slavery risks. This statement covers the reporting period from 1 April 2022 to 31 March 2023 and outlines FIA's approach to minimising modern slavery risks within our operations and supply chains. We recognise that modern slavery takes various forms, including slavery, servitude, human trafficking, forced labour, child labour, and deceptive recruitment processes.



FIA is committed to ethical standards and compliance with labour rights regulations. We conduct our business dealings with integrity and honesty. To achieve this commitment, we require our suppliers to adhere to all applicable modern slavery laws, including those prohibiting human slavery, slavery-like practices, human trafficking, and child labour. We are dedicated to implementing measures that ensure our supply chains remain transparent and free from modern slavery.

## Our Business

Founded in 1882, FIA has a rich history of progress in recognising the inherent dignity of all individuals. Our commitment to respecting and promoting human rights remains steadfast, both now and in the future. As a leading entity in the Australian Sugar Industry, we take pride in our companies being well-recognised household names and employers.

Traditionally, FIA has played key roles as a grower, miller, refiner, and marketer of sugar and related



products in Australia. We own and operate a sugar mill and refinery in Queensland, which in the last season crushed over 1 million tonnes of sugar cane, yielding over 135,000 tonnes of sugar. Approximately 82% of this sugar is refined and provided to Australian customers for domestic consumption. Additionally, our mill produces around 35,000 tonnes of molasses, a by-product of sugar cane, which is supplied to Bundaberg Molasses at our Oakey manufacturing site. Bundaberg Molasses manufactures a range of molasses-based supplements and formulated products for the feedlot industry. This business unit also supplies

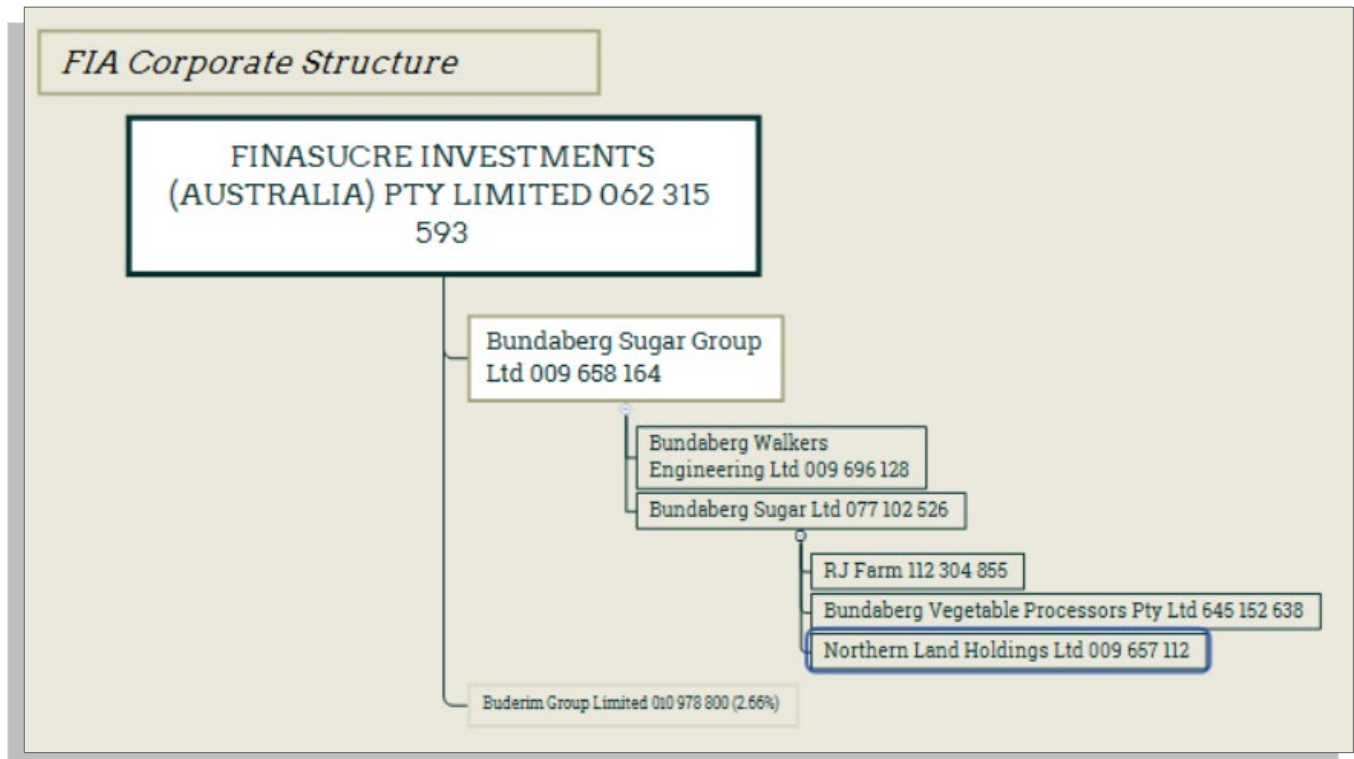
supplementary paddock feed to dairy and pasture customers under the brand Prolix.

Additionally, FIA's operations include Bundaberg Walkers Engineering Ltd, a long-standing heavy engineering and foundry enterprise based in Bundaberg. With an annual



revenue turnover of approximately 30 million AUD, this unit supplies domestic sugar mills and exports sugar milling equipment and expertise to countries such as Thailand, Indonesia, and Mexico.

FIA is structured as a private company and is managed by a Board of Directors. The diagram below depicts the corporate structure with ownership being 100% unless otherwise noted.



FIA is one of Australia's largest cane growers with up to 350 employees over its range of activities. In addition to growing sugar cane, during the reporting period, FIA has grown and harvested a variety of small crops including sweet potatoes, ginger and soybeans etc. The Company is able to rotate these crops to obtain the most sustainable and beneficial use of the land it has invested in, just over 420 hectares in the Wide Bay region.

FIA proudly ranks among Australia's largest cane growers, employing up to 350 dedicated personnel across our diverse range of activities. Beyond our core sugar cane cultivation, during the reporting period, FIA has demonstrated versatility by expanding into the cultivation and harvesting of various small

crops, including sweet potatoes, ginger, soybeans, and more. This strategic diversification allows us to optimise land usage and promote sustainability in the land.

## Our Modern Slavery Risks

The Global Slavery Index for Australia (2023) highlights the prevalence of forced labour exploitation in several industries, with the agricultural sector being particularly high-risk. According to the report, Pacific migrants arriving through labour mobility schemes often face exploitation in rural areas, enduring wage theft and unsafe working conditions. These workers rely on fair treatment from their visa-sponsoring employers, making them more vulnerable to abuse. Moreover, the lack of regulation concerning employer deductions from workers' wages for transport and accommodation can lead to debt bondage. Unfortunately, workers often do not report these issues due to various barriers, including fear and insecurity.

To address labour shortages in our farming operations, FIA has directly and indirectly engaged workers who fall into this exploitation risk category. This includes individuals employed through Seasonal Worker Program visas (Pacific migrants), Working Holiday visas, and, to a lesser extent, International Student visas. Additionally, we engage farming labour through third-party labour hire companies. Notably, we also directly employ Pacific migrants under the Pacific Australia Labour Mobility Scheme (the Scheme). During the reporting period, these employees have been engaged in both farming and refining areas of our business.







## Actions taken to assess and address risks

### *Within our Operations*

In order to maintain our status as an approved employer under the Scheme, FIA diligently undertakes a range of assurance activities. These activities serve the dual purpose of ensuring our compliance with Scheme obligations and upholding the workplace rights and protections of the workers participating in the Scheme. These are the same rights and protections equivalent to those enjoyed by Australian workers.

Our scheme assurance activities include monthly audits aimed at verifying several key aspects;

- ▶ Ensuring that wage deductions are accurate in strict accordance with the Schemes guidelines
- ▶ Confirming that minimum net pay guarantees are consistently met
- ▶ Verifying that the minimum guaranteed hours of work per week are consistently provided to our workers

Additionally, FIA has designed and implemented a comprehensive welfare and wellbeing plan tailored specifically for this program. This plan includes a rigorous review of accommodation and transportation provided to our workers. To ensure the well-being of our employees, our dedicated Wellbeing Officer conducts regular in-person meetings to address any concerns workers may have regarding their employment, living conditions, or overall welfare.

Also, we believe in transparency and open communication. Our workers have transparent access to unions and the Fair Work Ombudsman, ensuring that they have the knowledge to access external parties should they feel FIA is not satisfactorily addressing any issues that may arise during their employment.



## Risks within Supply Chains

To proactively address the risks of modern slavery within our supply chains, FIA employs a rigorous supplier declaration/questionnaire process. Labour hire suppliers are mandated to complete this questionnaire upon their initial engagement with our company. To ensure ongoing compliance, suppliers are required to re-complete the declaration every two years.

The supplier declaration questionnaire is a comprehensive assessment tool that delves into various aspects that can serve as indicators of modern slavery. These include;

- ▶ Employment conditions, ensuring that lawful and reasonable deductions are in place
- ▶ Ethical trading practices, including the freedom of movement for workers and the handling of identification documents
- ▶ Provisions related to accommodation, such as compliance with local laws and transparent charges
- ▶ Aspects concerning the supply of transport for workers
- ▶ Worker representation, including engagement with unions
- ▶ Use of subcontracted labour

Before becoming an approved supplier for FIA, labour hire contractors must complete this extensive questionnaire. Upon receiving the completed declaration, FIA conducts a thorough review to determine whether the supplier's engagement methods and arrangements warrant further investigation or whether the responses indicate a minimal risk of modern slavery.

This comprehensive approach underscores our commitment to ethical sourcing and the diligent mitigation of modern slavery risks within our supply chains.

## Assessing the effectiveness of actions

FIA maintains an unwavering commitment to monitoring and ensuring the effectiveness of the initiatives outlined in this statement, as well as broader activities across our business that may impact labour rights standards, legislation, and statutory requirements. This commitment is upheld through a range of mechanisms, including robust governance structures, ongoing monitoring processes, and well-defined grievance management procedures.

To proactively ensure compliance with legislative changes throughout the year, we conduct a comprehensive gap analysis against our current policies and practices. Identified compliance gaps are promptly addressed through a review and update of the relevant processes, authorised by our Chief Executive Officer.

Independent bodies have assessed the effectiveness of our actions through a series of external audits, with FIA being certified under the Bonsucro standard since 2014. This standard, exclusive to the Sugar Industry, incorporates key principles related to social and human rights, labour rights, and occupational safety and health standards.

During the reporting period, FIA underwent a monitoring visit facilitated by the federal governments, Department of Employment and Workplace Relations (DEWR). This audit resulting in zero reported non-conformance issues with FIA's compliance under the Scheme.



To further assess the effectiveness and validity of our actions, and to reduce our exposure to modern slavery risks, FIA employs various methods, including:

- ▶ Conducting random interviews with workers
- ▶ Implementing a grievance management procedure
- ▶ Conducting ad-hoc exit interviews with workers
- ▶ Providing resources that enable workers to contact external parties if they wish to raise a concern

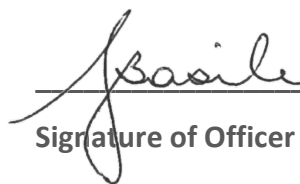
Additionally, on an ad-hoc basis our company conducts periodic reviews of supplier labour invoices against worker timesheets to ensure alignment of information and promptly identify any anomalies requiring corrective action.

## Consultation with other entities owned by FIA

Finasucre Investments (Australia) Pty Limited submits this report on behalf of the Bundaberg Sugar Group. Consultation has taken place with other entities of the group via discussions at the Bundaberg Sugar Group Board meetings.

This Statement was approved by the Board on behalf of each of the reporting entities on 27 September 2023 and is correct as of that date.

**Signed on behalf of the Bundaberg Sugar Group Board of Directors**



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Signature of Officer

Gaetano Basile

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Name of Officer

Director

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Position