MODERN SLAVERY
STATEMENT 2020-21

Reporting period: 1 July 2020 - 30 June 2021

Prepared pursuant to the Modern Slavery Act 2018 (Cth)

AUSTRALIAN GRAIN EXPORT PTY LTD

ABN 92 073 563 185 | ACN 073 563 185

Contents

About this Statement

This Modern Slavery Statement is made by Australian Grain Export Pty Ltd (ABN 92 073 563 185, ACN 073 563 185) (Australian Grain Export or AGE) for the financial year from 1 July 2020 to 30 June 2021.

The Statement describes AGE's structure, operations and supply chains; the modern slavery risks relevant to those operations and supply chains; the actions taken during 2020-21; how AGE assessed the effectiveness of those actions; and the consultation process relevant to the reporting period.

Basis of preparation
This Statement has been prepared to address AGE's 2020-21 reporting period using contemporaneous records. AGE's evidence base includes its first Modern Slavery Statement submitted in March 2021. That statement related to the financial year ended 30 June 2020; only controls described as current or ongoing during 2020-21 are relied on for this Statement.

Message from the Managing Director

Australian Grain Export recognises its responsibility to conduct business ethically and with respect for human rights. Modern slavery can occur in complex supply chains, including in agriculture, transport and logistics, international shipping and the manufacture of goods used by businesses.

This Statement presents AGE's 2020-21 position based on contemporaneous records. By March 2021, AGE had documented a Board-overseen risk assessment process, review of higher-risk suppliers, ongoing supplier conversations and policies relevant to employees and service providers. Measures introduced after 30 June 2021 are not attributed to this reporting period.

AGE is committed to strengthening its understanding of modern slavery risks, improving supply-chain visibility and building proportionate governance, due diligence, reporting and remediation processes over successive reporting periods.

Tim Martin

Managing Director
Australian Grain Export Pty Ltd

1. Reporting Entity, Structure and Operations

1.1 Reporting Entity

Australian Grain Export Pty Ltd is an Australian grain accumulation, trading and export business operating within the Australian agricultural supply chain. The reporting period covered by this Statement is 1 July 2020 to 30 June 2021.

Reporting entity	Australian Grain Export Pty Ltd
ABN	92 073 563 185
ACN	073 563 185
Reporting period	1 July 2020 - 30 June 2021
Principal governing body	Board of Directors

1.2 Organisational Structure

During the 2020-21 reporting period, AGE's principal operational sites were located at Dublin, South Australia, and Rupanyup, Victoria, with a corporate office in Adelaide, South Australia.

AGE maintains a permanent workforce and engages additional casual employees to support peak harvest operations. AGE also trades grain from other Australian regions and, where grain is not handled through AGE-operated facilities, uses third-party providers for receival, storage, handling, transport and port-related activities.

1.3 Operations

AGE's principal activities during the reporting period included the accumulation, storage, handling, trading and export of Australian grain and pulse commodities. Core commodities included:

- Wheat
- Barley
- Lentils
- Faba beans
- Field peas
- Chickpeas
- Lupins

AGE connects Australian growers and grain suppliers with domestic and international markets. Its activities include grain receival, storage and handling at its operational sites, commercial trading activities, coordination of road and rail movements, use of third-party storage and handling infrastructure, and coordination of port and ocean freight services for export.

2. Our Supply Chains

AGE's supply chain supports the accumulation, storage, handling, trading and export of agricultural commodities. The principal categories of goods and services relevant to the 2020-21 business model were:

Supply-chain category	Description
Grain and agricultural commodities	Australian-grown grain and pulse commodities sourced from growers and other participants in the Australian grain market.
Grain receival, storage and handling	AGE-operated facilities at Dublin and Rupanyup, supplemented by third-party storage and handling facilities where required.
Transport and logistics	Road freight, rail freight and associated logistics services used to move commodities between growers, storage facilities, AGE sites and ports.
Ports and ocean freight	Port, terminal, freight-broker, shipping line and related services used to export grain to international customers.
Operational goods and equipment	Tarpaulins, bunker and site consumables, equipment, replacement parts, information technology equipment and other operational supplies.
Technical and professional services	Maintenance, repairs, engineering, technical, administrative and professional services.

2.1 Geographic Reach and Third Parties

AGE's commodities are predominantly Australian-grown. However, the supply chain extends beyond AGE's own sites through third-party grain handlers, storage providers, road and rail operators, port and terminal providers, freight brokers and shipping lines. AGE may also purchase products from Australian suppliers whose manufacturing supply chains extend overseas.

2.2 Supply-chain Overview

Australian growers / grain suppliers → AGE or third-party storage → Road / rail logistics → Port / terminal → Ocean freight → International customer

AGE generally has greater visibility over its own operations and direct Australian suppliers than over workers and employment practices deeper in outsourced or international supply chains. This difference in visibility is relevant to AGE's assessment of modern slavery risk.

3. Identifying Modern Slavery Risks

Modern slavery has the meaning given by the Modern Slavery Act 2018 (Cth) and encompasses serious forms of exploitation including slavery, servitude, forced labour, trafficking in persons, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

AGE recognises that modern slavery risk concerns the risk to people, not merely risk to the business. In considering where exposure may arise, AGE has regard to the nature of the industry, workforce vulnerability, subcontracting, geographic reach, the complexity of the supply chain and the degree of visibility over employment conditions.

3.1 Risk in AGE's Own Operations

AGE's directly controlled operations are predominantly Australian. Direct management of employees and facilities provides greater visibility over employment arrangements than AGE has in deeper tiers of its supply chain. Nevertheless, seasonal and casual work associated with grain harvest can create worker vulnerability if appropriate employment and workplace controls are not maintained.

Potential areas requiring attention include recruitment practices, payment and employment conditions, working hours during peak periods, treatment of casual workers, workplace conditions and access to mechanisms for raising concerns.

3.2 Agriculture and Grain Procurement

Agriculture is a relevant risk area because farms and agricultural businesses can use seasonal, temporary, migrant, contracted or subcontracted labour. AGE does not control the employment arrangements of independent growers or businesses further within those suppliers' operations. Potential risks include forced labour, deceptive recruitment, debt bondage and other serious labour exploitation.

3.3 Storage, Handling, Transport and Logistics

AGE relies on third-party grain handlers, storage providers and transport operators. Risks may be more difficult to identify where service providers use subcontractors or temporary labour and where AGE has limited visibility beyond its direct contractual counterparty. Road freight, rail movements, warehousing and other logistics services therefore represent areas requiring proportionate due diligence.

3.4 Ports and Ocean Freight

International shipping creates additional complexity. Shipping lines, brokers, agents, port operators, vessel crews and subcontractors may operate across multiple jurisdictions with differing labour protections and enforcement. AGE's ability to directly control those employment arrangements is limited, creating potential direct linkage to modern slavery risks through business relationships.

3.5 Equipment, Electronics and Other Goods

AGE purchases equipment, replacement parts, information technology equipment and other operational goods. Even where purchased from Australian suppliers, finished products or components may be manufactured through multi-tier overseas supply chains. Potential exposure can arise in raw-material extraction, component manufacturing and assembly, particularly where production occurs in higher-risk jurisdictions or where supply-chain visibility is limited.

3.6 Professional and Technical Services

Maintenance, engineering, technical, administrative and professional services generally present a lower relative exposure than labour-intensive or internationally connected supply chains, but subcontracting and ancillary services can still create modern slavery risk.

3.7 Summary of Key Risk Areas

Area	Potential modern slavery risk	AGE relationship / visibility
Direct workforce	Seasonal and casual work; recruitment, hours, conditions and ability to raise concerns.	Greater direct visibility and control.
Growers / agriculture	Seasonal, temporary, migrant or subcontracted labour; limited visibility into supplier employment practices.	Primarily linked through procurement relationships.
Third-party storage / handling	Contracted or subcontracted labour; reduced oversight beyond the immediate provider.	Linked through service providers.
Road / rail logistics	Subcontracting, contracted labour and reduced visibility into lower-tier providers.	Linked through logistics providers.
Ports / ocean freight	International labour, multiple jurisdictions, vessel crews and subcontracting.	Linked through shipping, freight and port relationships.
Equipment / electronics	Overseas manufacturing and deeper-tier component supply chains.	Linked through procurement of finished goods.
Professional / technical services	Generally lower relative exposure; subcontracting can increase risk.	Linked through service providers.

3.8 Risk Priorities

The areas warranting particular attention during 2020-21 were agriculture and grain procurement; outsourced storage, handling and transport; ocean freight and international logistics; and manufactured goods with complex or international production chains. These areas combine worker vulnerability, subcontracting, international exposure or reduced visibility beyond AGE's direct suppliers.

4. Actions Taken During the Reporting Period

4.1 Evidence Base for 2020-21

Contemporaneous evidence

AGE's first Modern Slavery Statement was submitted in March 2021. Although that statement related to the preceding financial year, it recorded that AGE's supply-chain risk assessment process was continuing, that supplier conversations remained ongoing and that relevant policies were maintained and reviewed. This Statement relies only on those current or ongoing controls as evidence for 2020-21, not on actions expressly attributed to the earlier reporting period.

This approach relies on controls evidenced as current or ongoing during 2020-21. Measures introduced after 30 June 2021 are addressed in subsequent reporting periods and are not attributed to this period.

4.2 Risk Assessment and Due Diligence

By March 2021, AGE had documented that it had conducted a risk assessment of its operations and supply chain, including review of suppliers considered more likely to present modern slavery risk. The process was described as continuing under direct Board oversight. International logistics was identified as a particular area of higher potential risk because labour conditions may fall outside Australian legal protections.

The same contemporaneous record states that discussions internally and with suppliers remained ongoing as part of continued risk monitoring.

4.3 Governance, Policies and Response

AGE's March 2021 statement records that its Employee Handbook and Code of Conduct, Chain of Responsibility requirements and Work Health and Safety policies formed part of the governance framework relevant to employees and service providers. It also records that AGE maintained and reviewed policies with the aim of reducing modern slavery risk and setting expectations for those working with the business.

The statement further records that suspected breaches of conduct standards or company policies relating to modern slavery were to be investigated by senior management. Depending on the circumstances, consequences could include employee disciplinary action or termination, or discontinuance of a third-party contractor's services.

4.4 Reporting Basis

The actions described above are limited to controls evidenced as current or ongoing during 2020-21. Measures introduced after 30 June 2021 are addressed in subsequent reporting periods and are not attributed to this reporting period.

5. Assessing the Effectiveness of Our Actions

During 2020-21, AGE assessed implementation through ongoing risk review, supplier conversations, policy review and management response to identified issues. The framework at that stage did not use formal quantitative key performance indicators, so effectiveness is described qualitatively.

5.1 Position During the Reporting Period

AGE's March 2021 statement describes continuing risk assessment and supplier conversations, policy review and management response to breaches. These activities provided AGE with practical indicators that its modern slavery controls were being implemented during the reporting period.

The available evidence supports that risk assessment, supplier engagement, policy review and management-response controls were operating during the period. AGE therefore assesses effectiveness by reference to those implementation indicators rather than a quantified year-end score.

5.2 Indicators of Implementation

The records identify several practical indicators of implementation:

- continuing review of operations, supply chains and higher-risk suppliers;
- ongoing internal and supplier conversations about identified risks;
- maintenance and review of employee and service-provider policies;
- senior-management investigation of relevant policy or conduct breaches;
- the ability to discipline employees or discontinue contractor services where warranted;

Together, these indicators provide evidence that AGE's modern slavery framework was operating during 2020-21. Quantitative completion percentages and outcome metrics were not part of the documented framework for that period, so no quantitative effectiveness result is stated.

6. Consultation Process

AGE did not own or control other entities during the 2020-21 reporting period. Accordingly, there were no controlled entities with which AGE was required to consult for the purposes of section 16(1)(f) of the Modern Slavery Act 2018 (Cth). AGE nevertheless maintained internal and supplier engagement relevant to modern slavery risk during the period.

Relevant engagement during the reporting period included:

ongoing internal discussion of modern slavery risks and the operation of AGE's risk assessment process;

ongoing supplier conversations concerning identified supply-chain risks; and

Board and senior-management oversight of the risk assessment and response framework.

This engagement supported AGE's ongoing review of modern slavery risks and controls during the reporting period.

7. Continuous Improvement and Future Priorities

AGE's records from 2020-21 show an emerging modern slavery framework with Board oversight, supply-chain risk assessment and policy-based controls. The same records also identify areas where the framework required further development, particularly reporting mechanisms, third-party assurance and evidence of effectiveness.

Priority	Intended direction
Governance and oversight	Maintain clear responsibility and Board oversight for modern slavery risk and compliance.
Supplier due diligence	Continue risk assessment and supplier review, with particular attention to international logistics and other higher-risk relationships.
Third-party standards	Review policies applying to third parties and strengthen evidence that relevant expectations are communicated and monitored.
Reporting mechanisms	Improve mechanisms that allow employees and other stakeholders to identify and raise modern slavery concerns.
Training and awareness	Develop structured awareness and role-specific training for employees involved in supplier and logistics relationships.
Remediation	Build on management escalation and contractual consequences with a clearer person-centred remediation process.
Effectiveness	Introduce measurable indicators and retain evidence showing whether due diligence, reporting and other controls are operating as intended.

AGE will continue to distinguish between measures actually implemented during a reporting period and future commitments or later improvements.

8. Approval and Signature

Approval by Principal Governing Body

This Modern Slavery Statement was approved by the Board of Directors of Australian Grain Export Pty Ltd, being AGE's principal governing body for the purposes of the Modern Slavery Act 2018 (Cth).

Board approval date: 2 September 2026

Signature of Responsible Member

Signed for and on behalf of Australian Grain Export Pty Ltd by:

Signature: ____

Name: Tom Reddecliffe

Position: Chief Financial Officer

Entity: Australian Grain Export Pty Ltd

Date: 2 September 2026

Annexure - Mandatory Reporting Criteria

This annexure identifies where Australian Grain Export Pty Ltd addresses the mandatory reporting criteria in section 16 of the Modern Slavery Act 2018 (Cth).

Mandatory requirement	Location in this Statement
16(1)(a) - Identify the reporting entity.	Pages 3-4
16(1)(b) - Describe the reporting entity's structure, operations and supply chains.	Pages 4-5
16(1)(c) - Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Pages 6-7
16(1)(d) - Describe actions taken to assess and address those risks, including due diligence and remediation processes.	Page 8
16(1)(e) - Describe how the reporting entity assesses the effectiveness of those actions.	Page 9
16(1)(f) - Describe the process of consultation with any entities the reporting entity owns or controls.	Page 10
16(1)(g) - Include any other information the reporting entity considers relevant.	Page 10
Section 13(2)(c) / 16(2)(a) - Principal governing body approval.	Page 11
Section 13(2)(d) - Signature of a responsible member.	Page 11