



MODERN SLAVERY STATEMENT 2023-24

Reporting period: 1 July 2023 - 30 June 2024

Prepared pursuant to the Modern Slavery Act 2018 (Cth)

AUSTRALIAN GRAIN EXPORT PTY LTD

ABN 92 073 563 185 | ACN 073 563 185

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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 2023 to 30 June 2024. From 17 February 2023, AGE's controlled group structure included Integra Foods Pty Ltd, a dormant holding company and subsidiary of AGE, and Integra Foods Australia Pty Ltd (ABN 12 665 877 832), a subsidiary of Integra Foods Pty Ltd and the operating entity of the Integra Foods business. During the 2023-24 reporting period, Integra Foods Australia Pty Ltd's Dublin plant remained in the commissioning phase and had not commenced normal commercial production.

The Statement describes AGE's structure, operations and supply chains, including the position of its controlled entities during the reporting period; the risks of modern slavery practices across AGE and its controlled entities; the actions taken during the reporting period to assess and address those risks; how AGE assessed the effectiveness of those actions; and the consultation process across the group.

Basis of preparation

This Statement has been prepared to address AGE's 2023-24 reporting period using contemporaneous records, including Modern Slavery Policy & Guidelines Version 1.2 dated 4 August 2023, employee training records dated 11 October 2023, Management Review minutes dated 21 November 2023 and the 2022-23 Modern Slavery Statement approved on 17 August 2023. Corporate structure and entity status have been confirmed by management for the reporting period. Actions undertaken after 30 June 2024 are not attributed to 2023-24.

Message from the Managing Director

Australian Grain Export recognises its responsibility to conduct business ethically and with respect for human rights across its own operations and supply chains and those of entities it owns or controls. Modern slavery risks can arise through complex supply chains, particularly in agriculture, outsourced storage and handling, transport and logistics, international shipping, commissioning and technical contracting, and the manufacture of goods used by businesses.

By 2023-24, AGE had a documented modern slavery framework including Modern Slavery Policy & Guidelines, Board oversight, supply-chain risk assessment and supplier engagement measures, employee awareness activity and reporting arrangements for concerns. Training records dated 11 October 2023 record that modern slavery content in the Employee Handbook was covered with employees, and Management Review minutes dated 21 November 2023 record discussion of the Modern Slavery Policy. During the reporting period, Integra Foods Pty Ltd was a dormant holding company within the AGE group, while Integra Foods Australia Pty Ltd was the operating entity of the Integra Foods business and its Dublin plant remained in the commissioning phase through 30 June 2024.

AGE remains committed to proportionate, risk-based due diligence and to improving supply-chain visibility, supplier engagement, 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 2023 to 30 June 2024.

Reporting entity	Australian Grain Export Pty Ltd
ABN	92 073 563 185
ACN	073 563 185
Reporting period	1 July 2023 - 30 June 2024
Principal governing body	Board of Directors
Controlled entities	Integra Foods Pty Ltd - subsidiary of AGE; dormant holding company during the reporting period Integra Foods Australia Pty Ltd (ABN 12 665 877 832) - subsidiary of Integra Foods Pty Ltd; operating entity of the Integra Foods business

1.2 Organisational Structure

During the 2023-24 reporting period, AGE's principal operational sites were located at Dublin, South Australia, and Rupanyup, Victoria, with a corporate office in Adelaide, South Australia. From 17 February 2023, AGE's controlled group consisted of Australian Grain Export Pty Ltd as the parent, Integra Foods Pty Ltd as a dormant holding company and subsidiary of AGE, and Integra Foods Australia Pty Ltd as a subsidiary of Integra Foods Pty Ltd and the operating entity of the Integra Foods business.

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 receipt, storage, handling, transport and port-related activities. Integra Foods Pty Ltd was dormant and did not conduct separate operating activities. During the 2023-24 reporting period, Integra Foods Australia Pty Ltd's Dublin plant remained in the commissioning phase as it prepared for plant-based ingredient production and had not commenced normal commercial production.

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 receipt, 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.

During 2023-24, AGE's controlled group included Integra Foods Pty Ltd as a dormant holding company and Integra Foods Australia Pty Ltd as the operating entity of the Integra Foods business. Integra Foods Australia Pty Ltd's Dublin plant remained in the commissioning phase and had not commenced normal commercial production. Commissioning activities related to preparation of the facility for the manufacture of plant-based faba ingredients, including protein concentrate, starch concentrate and flour.

2. Our Supply Chains

AGE's supply chain supports the accumulation, storage, handling, trading and export of agricultural commodities. Integra Foods Pty Ltd was a dormant holding company and did not have a separate operating supply chain. During the 2023-24 reporting period, the reporting scope also included the commissioning-related supply-chain activities of Integra Foods Australia Pty Ltd. The principal categories of goods and services relevant to the 2023-24 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 receipt, 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.

During the 2023-24 reporting period, Integra Foods Australia Pty Ltd's relevant supply-chain activities were primarily commissioning-related. Relevant categories included plant and equipment suppliers, engineering and technical contractors, installation and maintenance services, operational inputs used for commissioning, and associated logistics. As normal commercial production had not commenced by 30 June 2024, its operating supply chain was still developing during the reporting period.

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, its controlled entities 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. The assessment also considered the status and activities of AGE's controlled entities during the reporting period.

3.1 Risk in AGE's Own Operations

AGE's directly controlled operations were predominantly Australian. Integra Foods Pty Ltd was a dormant holding company and did not have a separate operational workforce. Integra Foods Australia Pty Ltd's commissioning activities at Dublin formed part of AGE's controlled group during the reporting period. 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, commissioning activities and contractor engagement 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, contractor labour 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 / controlled operations	Seasonal and casual work; recruitment, hours and conditions; commissioning and contractor labour at Integra Foods Australia Pty Ltd; ability to raise concerns.	Greater direct visibility and control; Integra Foods Pty Ltd was dormant.
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

AGE's contemporaneous 2023 policy identified international logistics as a particular higher-risk area because labour conditions may fall outside Australian legal protections. It also identified country risk and the possibility that cost or delivery pressures could unintentionally influence supplier labour conditions. Consistent with AGE's broader supply chain, agriculture and grain procurement, outsourced storage and transport, international freight and complex manufactured goods remain areas requiring proportionate attention. Integra Foods Australia Pty Ltd's commissioning activities and associated contractors, equipment suppliers, technical services and developing supply chain were also relevant to AGE's risk assessment during the reporting period.

4. Actions Taken During the Reporting Period

4.1 Policy, Governance and Risk Assessment

During 2023-24, AGE operated under Modern Slavery Policy & Guidelines Version 1.2, dated 4 August 2023, which assigns Board oversight for identifying, analysing and responding to modern slavery risks. Management Review minutes dated 21 November 2023 record discussion of the Modern Slavery Policy. AGE's controlled group included Integra Foods Pty Ltd as a dormant holding company and Integra Foods Australia Pty Ltd as the operating entity of the Integra Foods business, with the Dublin plant remaining in the commissioning phase through 30 June 2024.

The Policy records that AGE conducted a risk assessment of its operations and supply chain to identify entities more likely to present modern slavery risk. The assessment recognised that AGE was more likely to be directly linked to modern slavery through business relationships than to cause modern slavery within its own operations, and identified international logistics as a particular area of higher potential risk.

4.2 Supplier Due Diligence and Engagement

AGE's documented due diligence approach during the reporting period included analysis of supply-chain operations, identification of key supply-chain entities where modern slavery risk may arise, and engagement with supply-chain contractors.

- the Policy records that AGE had forwarded its Modern Slavery Policy & Guidelines to supply-chain contractors and requested acknowledgement of receipt;
- the Policy established a follow-up process for higher-risk third parties associated with offshore labour or higher-risk countries, under which those parties were to receive the Policy & Guidelines and be asked to respond regarding modern slavery practices;
- the Policy states that all new entities entering the supply chain are provided the Policy & Guidelines prior to engagement; and
- the Policy records ongoing supplier conversations as part of continuing risk monitoring.

These measures formed AGE's documented supplier due diligence framework during 2023-24.

4.3 Internal Controls, Awareness and Reporting

The Policy & Guidelines operated alongside AGE's Employee Handbook, Code of Conduct, Chain of Responsibility and Work Health and Safety policies. Training records dated 11 October 2023 show that employees were taken through modern slavery content in the Employee Handbook. AGE also documented review of supply-chain and engagement processes and Director awareness of modern slavery obligations.

AGE's 2022-23 Modern Slavery Statement, approved on 17 August 2023, records an implemented Whistleblower Policy and confidential channels for employees to raise modern slavery concerns. These arrangements remained part of AGE's compliance framework during 2023-24.

During the 2023-24 reporting period, Integra Foods Australia Pty Ltd remained in the commissioning phase and had not commenced normal commercial operations. The employee training conducted on 11 October 2023 is reported as an AGE workforce action. Training undertaken after 30 June 2024 is reported in the subsequent reporting period.

4.4 Remediation and Response

AGE's Policy & Guidelines require relevant breaches to be investigated by the Compliance Officer, with disciplinary action for employees or discontinuance of supplier or contractor services where appropriate.

The Policy dated 4 August 2023 recorded no identified risks requiring action beyond the supplier engagement measures described in the Policy. No confirmed modern slavery incident requiring specific remediation was identified in the records for the reporting period.

4.5 Reporting Basis

AGE reviewed contemporaneous policy, training, management review and supplier governance records relevant to the 2023-24 reporting period. The actions and outcomes reported in this Statement are those supported by the records for the period. Quantitative results are stated only where they can be supported, and activities undertaken in later reporting periods are not attributed to 2023-24.

5. Assessing the Effectiveness of Our Actions

By 2023-24, AGE had documented goals and monitoring methods intended to support assessment of the effectiveness of its modern slavery framework. The Policy & Guidelines describe effectiveness assessment as an ongoing and evolving process and provide for actions to be strengthened or new actions introduced where required. These measures applied to AGE's modern slavery framework during the reporting period, with the status and activities of controlled entities considered in proportion to their operations.

5.1 Documented Measures

Measure	Documented evaluation approach
Staff awareness	Target of 90% awareness, evaluated through issue of the Modern Slavery Policy & Guidelines to staff, with annual monitoring by the Compliance Manager.
Supply-chain review	Target of 90% review, evaluated through the Supply Chain Register, with annual monitoring by the Compliance Manager.
Director awareness	All Directors to understand their obligations, evaluated through management meetings, with annual monitoring involving the Compliance Manager and Directors.

5.2 Effectiveness Assessment During 2023-24

The documented measures demonstrate that AGE had established a structured approach to effectiveness assessment. The employee training record dated 11 October 2023 and the Management Review minutes dated 21 November 2023 provide specific evidence that workforce awareness and management review activities were implemented during the reporting period. Supplier engagement, policy distribution, supply-chain review and management oversight also provided mechanisms through which AGE could assess implementation of its controls.

The 11 October 2023 training formed part of AGE's pre-harvest workforce training program and included the modern slavery content contained in the Employee Handbook. The training record demonstrates implementation of AGE's workforce-awareness activity during 2023-24. AGE's Policy also established measurable staff-awareness and supply-chain review targets, providing a basis for annual effectiveness assessment. Future reporting will continue to record completion results against these measures as supporting data is consolidated. Integra Foods Pty Ltd was dormant during the reporting period, while Integra Foods Australia Pty Ltd remained in the commissioning phase through 30 June 2024.

5.3 Continuous Review

AGE recognises that effectiveness cannot be assessed solely by the absence of identified incidents. Future assessments should combine implementation measures with evidence of supplier engagement, concerns raised and resolved, corrective actions, changes in identified risk and progress against agreed improvement actions across AGE and any controlled entities.

6. Consultation Process

From 17 February 2023, AGE's controlled group structure included Integra Foods Pty Ltd, a dormant holding company and subsidiary of AGE, and Integra Foods Australia Pty Ltd, a subsidiary of Integra Foods Pty Ltd and the operating entity of the Integra Foods business. Both entities are included in the consultation process described below for the purposes of section 16(1)(f) of the Modern Slavery Act 2018 (Cth).

AGE consulted relevant management responsible for AGE, Integra Foods Pty Ltd and Integra Foods Australia Pty Ltd to confirm the group structure, the dormant status of Integra Foods Pty Ltd, the commissioning status of Integra Foods Australia Pty Ltd, and the operations and supply-chain relationships relevant to the reporting period.

The consultation process included:

- confirming the group structure in place from 17 February 2023 and the dormant status of Integra Foods Pty Ltd during the reporting period;
- confirming Integra Foods Australia Pty Ltd's role as the operating entity of the Integra Foods business and its commissioning status through 30 June 2024;
- reviewing the Modern Slavery Policy & Guidelines Version 1.2 dated 4 August 2023, the employee training record dated 11 October 2023, the Management Review minutes dated 21 November 2023 and the 2022-23 Modern Slavery Statement approved on 17 August 2023;
- reviewing available records describing the commissioning of the Dublin facility, its intended faba-processing activities and relevant commissioning-related supply-chain categories;
- considering workforce, supplier, contractor, reporting and remediation risks relevant to AGE and to Integra Foods Australia Pty Ltd's commissioning activities; and
- providing relevant group management with an opportunity to review and confirm the information presented.

This consultation ensured that the Statement reflects the structure and activities of AGE's controlled entities during the 2023-24 reporting period.

7. Continuous Improvement and Future Priorities

AGE's 2023-24 records demonstrate progress in formalising its modern slavery framework. Future reporting and due-diligence processes will explicitly cover AGE and its controlled entities, with the level of review proportionate to each entity's operations and risk profile. Further improvement will focus on strengthening evidence, consistency and risk-based due diligence across the group.

Priority	Intended direction
Supplier due diligence	Maintain a documented risk-based supplier review process across AGE and controlled entities and retain evidence of acknowledgements, responses and follow-up actions.
Supplier questionnaire	Verify and, where appropriate, complete implementation of a proportionate questionnaire process for AGE and controlled-entity suppliers and contractors presenting higher potential risk.
Risk-based escalation	Define clear triggers for enhanced due diligence where geography, labour model, subcontracting or other indicators increase modern slavery risk.
Training and awareness	Maintain staff awareness across AGE and controlled entities and develop role-specific training for employees involved in procurement, trading, logistics, compliance and supplier management.
Reporting and remediation	Maintain confidential reporting channels and strengthen a person-centred remediation process for any identified concern.
Effectiveness evidence	Record annual results across AGE and controlled entities against defined measures, including supplier review coverage, staff awareness, concerns raised, corrective actions and management review outcomes.

AGE will continue to report transparently on measures actually implemented during each reporting period and distinguish completed actions from future commitments.

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