



Summit Rural (WA) Pty Ltd

Modern Slavery Statement

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) by Summit Rural (WA) Pty Ltd ABN 49 058 794 737 (SRWA) for the financial year ending 31 March 2020.

Our stance against modern slavery

SRWA is committed to conducting business responsibly and ethically and to ensuring that all aspects of our business practices, including our supply chains, are free from any form of slavery. We reject any and all forms of modern slavery which can take the form of unpaid or underpaid servitude, human trafficking and forced labour. SRWA is committed to implementing effective systems and controls to ensure that it does not take place within our own business or through any of our supply chains.

Our organizational structure and operations

SRWA is an importer, manufacturer, and distributor of granular fertilizer within Western Australia, with 5 locations across the state. We supply fertilizer as well as offer a range of services, which includes soil and plant analysis and fuel gauges, amongst others.

This year SRWA employed 90 people across our 5 locations, the majority of which are full time, permanent employees as well as casuals. SRWA will also engage the professional services of contractors who have unique knowledge or skills to support specific project activities, including engineering firms and information technology experts.

Our supply chain

We operate an importing and distribution platform with our network of depots across Western Australia. SRWA currently has both domestic and overseas suppliers. They supply raw materials, shipping services, transportation, equipment and services to maintain the depots as well as the usual office related services. Arrangements with suppliers are a mixture of one-off purchases and longer term contracts.



SRWA recognises that there are parts of our supply chain that may have a higher risk of being directly linked to modern slavery. These include goods and/or services procured by SRWA which are linked to high risk industries, are high risk products themselves or are in high risk countries. Supplier location is one of the considerations made when sourcing our fertilizer and also one of the higher risk areas regarding modern slavery. We have suppliers located in Asia, the Middle East, North America, and Europe, as well as domestically in Australia.

Our operations

SRWA considers the risk of modern slavery within its operations to be low and there has been minimal impact upon the business by COVID-19 with all suppliers remaining the same. All employees can raise concerns about modern slavery in a confidential manner. Should an occurrence or potential occurrence of modern slavery be identified, either internally related to employment practice or working conditions, or externally within the supply chain, then appropriate corrective action shall be taken in line with the Company's response plan which forms part of the Company's Modern Slavery Procedure implemented this year.

Our policies and approach to Governance

SRWA is committed to working towards preventing and mitigating risks of modern slavery in its operations and supply chains. During this financial year SRWA introduced Modern Slavery Policy and Procedure documents. Actions taken included:

- Established a modern slavery working group
- Reviewed Modern Slavery Act guidelines
- Training provided on modern slavery policy and procedures was given to all executive management and relevant staff
- Started project to review all existing suppliers:
 - risk assessment (based on geographic, product/services and industry specific risk) carried out by appropriate department executive manager
 - further due diligence carried out for those with any risk indicators
 - supplier questionnaires sent to those suppliers deemed high risk
 - Prepared clauses relating to modern slavery for new contracts with suppliers

- Communication with suppliers, electronically or face to face if possible, to discuss modern slavery as required
- Adopted procedure for onboarding new supplier, to include modern slavery review
- ERP system amended to assist with modern slavery reporting/tracking
- Reported on modern slavery project status and statistics to executive management team

Presently SRWA is continuing its full review for all suppliers. Results so far:

Supplier category	Total No. Suppliers	Review completed	% Review completed
Domestic	1103	860	78
Overseas	47	44	94

All suppliers where review is completed have no indicators of issues with modern slavery. Communication with suppliers is ongoing for those not yet completed. It is anticipated that the remaining suppliers will be finished in the first half of 2021.


In addition, the principle objectives of SRWA's Modern Slavery policy are delivered through associated policies and procedures, such as:

- Compliance Policy and Compliance Manual
- Whistleblowing Policy and Whistleblowing Procedure

The policies apply to all people working for or behalf of SRWA in any capacity, including employees, directors, officers, agency workers, contractors, consultants, and any other third-party representatives. SRWA is committed to ensuring all staff are kept up to date with ongoing training and updates in all areas stated above.

Assessing effectiveness

The effectiveness of steps taken to address modern slavery risks in our business and supply chains will be better assessed in the next reporting period when SRWA has the benefit of reviewing the impact of processes put in place. However, certain processes now put in place such as the additional requirements for new suppliers to be set up, has ensured engagement and awareness of modern slavery issues for both staff and suppliers.



Going forward, SRWA has the following performance indicators in place to measure its effectiveness in ensuring that slavery is not taking place in any of its business or supply chains:

- An annual review of modern slavery statement and policies
- Communication and personal contact, where feasible, with domestic suppliers to ensure their understanding of, and compliance with our expectations
- Communication (electronic only due to COVID-19) with overseas suppliers to ensure their understanding of, and compliance with, our expectations

Plan for remediation

No remediation requirements for this reporting period, however SRWA will consider the remediation processes more fully next year.

Our ongoing commitment

Over the next year SRWA will focus on:

- Compile and track any modern slavery issues
- Completion of review of existing suppliers
- Send a letter outlining SRWA Modern Slavery stance to all suppliers
- Review and update the Modern Slavery Policy and Procedure documents as required
- Ensure all relevant staff are fully trained on areas relating to Modern Slavery as required

This statement was approved by the Board of Summit Rural (WA) Pty Ltd on 4th December 2020



Masafumi Tokui, Chairperson, 4th December 2020