



FINANCIAL YEAR 2024

# Modern Slavery Statement

Ameropa Australia Pty Ltd

ACN 009 504 394



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# Introduction

Ameropa Australia Pty Ltd (trading as Impact Fertilisers and Brown's Fertilisers) is committed to corporate social responsibility and to acting ethically and with integrity in all our business dealings and relationships; and to implementing and enforcing effective systems and controls to mitigate modern slavery in our business and supply chains.

This Statement sets out all the steps and measures we are putting in place to reach this goal.

Jim Mole

**Chief Executive Officer**





# Ameropa Australia Pty Ltd ACN 009 504 394

## Modern Slavery Statement

This Statement is made in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) (Act). This Statement describes the modern slavery risks in the operations and supply chain of Ameropa Australia Pty Ltd (ACN 009 504 394) ("Ameropa", "us", "we" or "our") and the actions taken to assess and address those risks during the 2024 financial year (which ended on 31 December 2024).

Criteria required under the Act	Page reference in this statement
<i>Identify the reporting entity</i>	4
<i>Describe the reporting entity's structure, operations, and supply chain</i>	4/5/6
<i>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls</i>	7/8
<i>Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes</i>	8/9/10
<i>Describe how the reporting entity assesses the effectiveness of these actions</i>	12/13
<i>Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)</i>	n/a

## Our Structure, Operations and Supply Chains

Ameropa is a wholly owned subsidiary of TIPA Holding AG and part of the Ameropa Group, a global business with its Head Office located in Binningen, Switzerland.

Ameropa Group is a privately owned international agribusiness, specialising in the trading and distribution of fertiliser, food, and feed products.

Ameropa is a privately held company incorporated in Australia and registered in Tasmania, Australia. Ameropa does not own or control any other entities.

Ameropa currently has 195 employees, with approximately 36 based at the Melbourne Head Office.

Of this number, 21 are professionals, 46 are managers, 23 are administrators or clerical staff, 83 are operators, 11 are technical trades people and 11 are in sales roles.

Employees based at our Hobart manufacturing plant are covered by the Ameropa Australia Enterprise Agreement.

Operational, transport and selective administrative employees are covered by relevant industrial awards.

Ameropa employs a number of foreign citizens who have working rights in Australia.

Ameropa distributes fertiliser products within Australia through its brands 'Impact Fertilisers' and 'Brown's Fertilisers'.

## **Impact Fertilisers**

Impact Fertilisers is a wholesale distribution business, which sells its products and services through an extensive dealer network in Eastern Australia. There are nine Impact Fertilisers' distribution depots on the mainland of Australia and seven depots in Tasmania, providing a convenient dispatch footprint for wholesale customers. Our infrastructure also includes a Single Super Phosphate manufacturing plant in Hobart, Tasmania.

Impact Fertilisers supplies dealers with a wide range of quality fertiliser products that the dealers on-sell to Australian growers. Our products include Urea, Single Super Phosphate, Mono-Ammonium Phosphate, DiAmmonium Phosphate, Muriate of Potash, and Sulphate of Ammonia, together with a range of specialty products designed to improve farming productivity even further such as: ZincStar®, and N-Protect®.

Impact Fertilisers offers blending services and can provide product as bulk or bagged, depending on the depot of dispatch.

## **Brown's Fertilisers**

Brown's Fertilisers (Brown's) is a retail and fertiliser spreading business. Brown's has been operating in North East Victoria and the South and West Gippsland areas for over 35 years. Brown's has three depots across Gippsland, a depot in Northeast Victoria and their own small fleet of trucks.

Services include soil testing and agronomy; fertiliser and lime spreading; compost and manure spreading; fertiliser bins; bulk and 25kg bags and bulk cartage.

## **Supply Chain**

Ameropa's largest category of spending was on fertiliser.

The categories of products and services that contribute to our products for sale include:

- Procurement of raw materials from overseas and shipping those products to Australia;
- Shipborne product dispatch and storing it;
- Wholesale and retail distribution of products;
- Distribution of products to customers;
- Manufacture of products; and
- Agronomy and spreading services.

The categories of products and services that contribute to our office operations include:

- IT hardware and software
- Corporate merchandise
- Office furniture and fit outs
- Leases

- Utilities
- Food and beverages
- Commercial vehicles
- Warehouse vehicles and machinery

## Key Areas of Focus in 2024

In 2023, Ameropa updated its Supplier Code of Conduct and its Modern Slavery Policy.

Key initiatives in the 2024 financial year included:

### 1. Modern Slavery Questionnaire to Suppliers and Supplier Code of Conduct

Ameropa continues to assess and monitor its suppliers in relation to potential modern slavery risks. The technology service provider we work with provides an online platform which we use to manage the distribution and assessment of a Modern Slavery Questionnaire (Questionnaire). The platform has been created in collaboration with an international law firm and provides a modern slavery risk assessment tool that we rely on to conduct our supplier due diligence each year.

The platform has an underlying risk algorithm which provides an overall modern slavery risk rating based on the answers provided by suppliers who complete the Questionnaire. The algorithm draws upon international databases, including the US Department of Labor List of Goods Produced by Child Labor or Forced Labor, World Bank Governance Indicators, Global Slavery Index, and International Work Group for Indigenous Affairs.

We use the platform as a sieve to assist us in adopting a pragmatic approach to identifying the suppliers that we need to focus on for further engagement.

The suppliers who were sent the Questionnaire in 2024 were provided a copy of the revised Supplier Code of Conduct and confirmation was sought in relation to their compliance with that code.

### 2. Internal Training, Awareness and Policies

Ameropa maintains a focus on training and collaboration to improve awareness and knowledge amongst our team members.

Our onboarding training process involves new employees undertaking e-learning modules in a broad range of workplace and legal areas that reflect our workplace policies including specific modern slavery training to ensure all new employees and contractors are educated on modern slavery.

In addition to this, our existing employees and contractors are required to refresh their knowledge of key internal policies annually, including the Whistleblower Policy, the Modern Slavery Policy, our Code of Conduct and Conflict of Interest Policy and provide confirmation that they have read the policies and will comply with them.

### **3. Contract clauses**

Ameropa has clauses that contractually require suppliers to comply with our modern slavery obligations, Anti-Bribery and Corruption laws and Supplier Code of Conduct.

These clauses are incorporated in our standard purchase order terms and conditions and standard works agreement and are included in supplier contracts when feasible. These contractual clauses demonstrate to our suppliers the importance Ameropa places on minimising the risk of modern slavery in our supply chains.

### **4. Following up with moderate or high-risk suppliers**

We reviewed the Questionnaire results from 2024 and identified the suppliers requiring further engagement. We focussed on the suppliers that received a moderate or high-risk rating to assess the responses and to conduct desktop due diligence of their supply chain where necessary. As part of this engagement process, we wrote to the suppliers to request further information or to request documentary evidence of their modern slavery risk mitigation practices.

By embarking on this process, Ameropa aims to take an informed risk-based approach with these suppliers, work collaboratively with them to assess their supply chain risks and take steps to implement appropriate actions to mitigate modern slavery risks.

## **Risks of Modern Slavery in our Operations and Supply Chains**

As Ameropa's operations are only in Australia, the country risk is considered to have lower prevalence of, and vulnerability to, modern slavery according to the Global Slavery Index. But we do not equate low risk with no risk and take measures as outlined in this Statement to ensure that our employees are trained on the red flags for modern slavery and that we, as an employer, comply with all applicable industrial relations and human rights laws

Ameropa sources products from Australian and international suppliers. In the case of international purchases, Ameropa obtains products via a related entity, Ameropa Asia Pte Ltd, as well as several other overseas suppliers (some of our top product suppliers are listed in the table below).

Procuring supplies from other countries inherently involves some modern slavery risk in Ameropa's direct (tier 1 suppliers) and indirect supply chain (tier 2+ suppliers). Further complexity exists beyond the first tier as it becomes increasingly difficult to obtain transparency in a long and complex supply chain.

In 2025, Ameropa is aiming to conduct a review into parts of its tier 2 supply chain with the support of Ameropa Asia to ensure that these suppliers align with Ameropa's ethical standards and to assess potential modern slavery risks.



Having conducted our review of the Questionnaire results, combined with our management of business and commercial relationships, we remain of the view that the risk of Ameropa having caused or contributed to modern slavery is low.

We have outlined below the location of some of our key overseas suppliers, the products or services we source from these suppliers, whether they supply to us directly or indirectly and our view of the potential modern slavery risks that are inherent based on the sourcing country and sector.

SOURCING COUNTRY	INHERENT RISKS	EXAMPLE OF PRODUCT/ SERVICE	DIRECT OR INDIRECT SUPPLY
Canada	Fair working conditions and training	Muriate of Potash	Direct dealing with Ameropa
China	Forced labour, fair working conditions	Urea, Rock Phosphate, Ammonium Phosphates, Surveying, and Inspection services	Dealing via Ameropa Asia
India	Migrant labour exploitation, bonded labour, Forced Labour	FIBC Packaging	Dealing with an Australian based supplier
Indonesia	Migrant labour exploitation, bonded labour	Urea	Dealing via Ameropa Asia
Malaysia	Forced labour, bonded labour, migrant labour exploitation	Urea	Dealing via Ameropa Asia
Saudi Arabia	Migrant labour exploitation, bonded labour, forced labour	Urea, Ammonium Phosphates, Sulphur	Dealing via Ameropa Asia
South Korea	Fair working conditions	Sulphur	Dealing with an Australian based supplier
Taiwan	Fair working conditions, forced labour	Sulphate of Potash	Direct dealing with Ameropa
Togo	Migrant labour exploitation, forced labour	Rock Phosphate	Direct dealing with Ameropa

## The actions we take to assess and address these risks

There are several actions that Ameropa has taken during the 12-month reporting period to assess and address the risks of modern slavery in Ameropa's operations and supply chains.




### 1. Supplier Due Diligence

By way of overview, the Questionnaire we issue to suppliers contains approximately 19 questions designed to assess the modern slavery risks in our suppliers' business and supply chains. The responses to the questions are weighted based on data analytics driven by global indices on modern slavery and human rights risks. The scoring focuses on five areas:



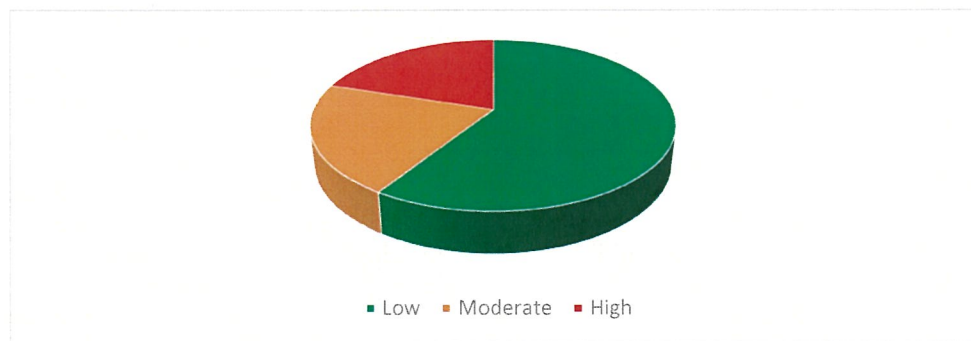
- 1) Jurisdiction (where a supplier operates and sources from)
- 2) Policies, processes, and systems (risk mitigating controls)
- 3) Activity (inherent industry risk)
- 4) Workforce profile (utilisation of potentially vulnerable workers)
- 5) Human rights (training, audits, and assessments on human rights)

Upon completion of the Questionnaire, the suppliers were allocated an overall risk rating between 1 to 10 with 1 presenting a lower modern slavery risk and 10 presenting a higher risk of modern slavery.

 Green	Score of 1 to 4
 Amber	Score of 5 to 7
 Red	Score of 8 to 10

During the Report Period, we observed an increase in the percentage of suppliers that completed the Questionnaire in comparison to 2023. The breakdown of the ratings allocated to suppliers that completed the Questionnaire are shown in the pie chart below. In summary:

- 1) The risk rating average was moderate. The Questionnaire was revised to include additional conditional questions including in relation to responsible sourcing practices where high-risk minerals are used and sourcing from the Xinjiang region which triggered a higher risk rating for some suppliers which increased the overall average to moderate in 2024.
- 2) We sought to engage with 15 suppliers following the review of the Questionnaire responses. Five of the suppliers had their risk rating scaled down following the clarification of incorrect responses. One supplier ceased to be a supplier during 2024. We await further responses from the remaining suppliers.
- 3) All suppliers agreed to comply with our Supplier Code of Conduct.
- 4) Four suppliers disclosed that they were the subject of a negative human rights audit, which we are following up to find out more information regarding the audit findings.



## 2. Modern Slavery Focus

Ameropa's Executive Leadership Team (ELT) has maintained a focused approach to modern slavery risks. In addition to the preparation of an Ameropa Modern Slavery Statement, the

ELT works to assess modern slavery risks in Ameropa operations and supply chain to find ways to reduce or mitigate these risks and to develop practices to enhance Ameropa's response to modern slavery.

### **3. Our Policies**

Ameropa has a longstanding set of policies in place that contribute to reducing the risk of modern slavery. These policies are reviewed annually and updated if necessary.

In addition to Ameropa's Modern Slavery Policy and the Supplier Code of Conduct, our other policies include an Anti- Bribery and Corruption Policy (currently under review), Whistleblower Policy, Discrimination, Harassment and Bullying Policy, Grievance Resolution Policy, and Counselling and Disciplinary Policy, employee Code of Conduct and Conflict of Interest Policy.

At Ameropa, we value education and transparency and each of our employees is made aware of the expectation that they will be familiar with and comply with all relevant policies.

Compliance education and training for all employees includes review, acknowledgement of understanding and signing off on the Code of Conduct, Conflict of Interest, Modern Slavery and Whistleblower Policies on an annual basis.

Policy notifications clearly outline the key elements of policies when they are issued; Managers are instructed to inform employees under their supervision and discuss the contents of policies in team meetings, and Quarterly Company communications briefings highlight the issue of any new or changed policies that are stored on the Ameropa intranet, accessible to all employees.

We believe that strong internal policies and systems are a key aspect of how we manage and mitigate the risk of modern slavery in our operations and supply chains.

### **4. Employee Education and Compliance**

Throughout this reporting period, Ameropa has taken steps to increase employee awareness and engagement regarding modern slavery through its Modern Slavery Policy, which was updated in 2023, distributed to all employees and is available to all employees on our intranet and through our employee education program.

Ameropa has robust employee policies and procedures in place with respect to the hiring of employees, to ensure that slavery, forced labour and unethical hiring practices are not occurring in Ameropa's hiring process or employment relationships.

### **5. Managing supplier contracts**

In 2024, we were not made aware of any relevant breaches by any of our suppliers. However, if a supplier were to be found in breach of the terms stipulated in their contract with us in relation to modern slavery, we would respond in a manner consistent with the United Nations Guiding Principles on Business and Human Rights.



## The Objectives for 2025

The ELT has set out the objectives below that it intends Ameropa to meet by the end of the 2025 financial year in relation to our modern slavery mitigation measures.

### 1. Continue due diligence activities

In 2024, Ameropa sent an updated Questionnaire to suppliers with whom it spends over \$20,000 annually or they are below that threshold but deemed a high-risk supplier e.g. cleaners.

The list of those receiving the updated Questionnaire in 2025 will include:

- new suppliers,
- suppliers that have already answered an earlier version of the Questionnaire in 2023 (to ensure that we have up to date knowledge of their operations); and
- those suppliers who have thus far not responded to the Questionnaire in 2023 and 2024.

We will follow up with those suppliers from the second half of 2024 who were assessed at high risk and seek assurances about their operations from a modern slavery risk management perspective.

If, during this process, Ameropa discovers that a supplier is non-compliant with our Supplier Code of Conduct or does not present adequate measures to mitigate modern slavery risks in their operations or supply chain, Ameropa will seek to work with the supplier to take appropriate steps to remedy this issue. If this supplier demonstrates an unwillingness to cooperate, Ameropa will consider ceasing its commercial relationship with the supplier and replace the supplier with a supplier that meets Ameropa's expectations regarding ethical behaviours.

We plan to conduct further engagement with the suppliers identified as having high and moderate risk of modern slavery in their supply chains and identifying the areas of their business that requires alignment with our standards.

### 2. Management of pre-qualification for new suppliers

We are aiming to be introducing a broader due diligence check for new suppliers in 2025 and take stronger measures to ensure that suppliers complete satisfactory responses to the Questionnaire and agree to our Supplier Code of Conduct.

### 3. Continue training and awareness building

Specific modern slavery training and updated information will continue to be provided annually to ensure all employees and contractors are continually educated on modern slavery and its potential risks.

### 4. Work towards assessing modern slavery risks in Ameropa's indirect supply chain

Ameropa is committed to making inroads into investigating aspects of our supply chain

beyond the first tier with the assistance of Ameropa Asia Pte Ltd.

## **5. Reporting concerns**

Ameropa promotes all individual concerns to be raised via our complaints and grievance process as set out in our Whistleblower Policy. Ameropa is committed to addressing any concerns and taking appropriate action where necessary. Employees receive an annual reminder to refresh their knowledge of the Whistleblower Policy and provide confirmation that they have read the policy and will comply with it.

In 2025 we will be publishing our updated Anti-Bribery and Corruption Policy and Whistleblower Policy on Ameropa, Brown's Fertilisers and Impact Fertilisers websites.

This allows community members and other interested stakeholders, such as our suppliers, to raise issues directly with our local operations managers.

We will review any complaints and grievances and aim to resolve any issue as soon as possible. We will also continue to send communications to all employees about modern slavery risks to increase awareness and inform them of the pathways available to them for reporting concerns.

## **How we assess the effectiveness of the actions we take to address the risks of modern slavery**

The effectiveness of the measures Ameropa takes to address the risks of modern slavery are assessed by Ameropa through the following means:

### **1. Responsibility and accountability for modern slavery Issues**

The ELT and the General Managers acknowledge that it is their responsibility to assist in assessing and addressing modern slavery risks in Ameropa's operations and supply chain. Modern slavery is discussed in ELT meetings. Going forward we will continue to gather, collate and act where appropriate based on information provided by our suppliers through our Questionnaire.

### **2. Supply chain mapping and risk assessment continued in 2024.**

Modern slavery issues will be communicated and integrated into risk management program under our Risk Management framework and reviewed and monitored.

Building on this, the responses to our 2024 Questionnaire will enable us to identify areas of risk and enable us to consider improvements to our risk profile and identify areas of improvement and the possibility of engagement with medium and high-risk suppliers to minimise risks.

### **3. Awareness**

Through our Modern Slavery Policy, training, ongoing risk assessment, and other communications, we have established an increasing awareness of modern slavery risks and the importance of mitigating those risks across our organisation. Ameropa will continue to use these tools to improve our modern slavery processes and ensure all stakeholders in



connection with Ameropa's services work collaboratively mitigate modern slavery risks.

#### **4. Our Grievance Resolution Policy and Whistleblower Policy**

These policies are available to report modern slavery concerns. Assessments of the number and nature of any complaints and grievances will be conducted to determine the effectiveness of actions taken to address modern slavery risk.

### **Statement Approval**

Ameropa does not own or control any other entities, therefore it did not consult with any other entities in the preparation of this Statement.

This Statement was approved by the Board of Ameropa.

Signed,



**Jim Mole**  
**Director and Chief Executive Officer**  
**Ameropa Australia Pty Ltd**

*25/6/2025*  
Date