

ETG Australia Modern Slavery Statement



1. Introduction

Export Trading Group (“ETG”) recognises that modern slavery remains a global challenge and that businesses operating across extended supply chains have an important role in addressing it. As one of the world’s largest agricultural and supply chain organisations, we acknowledge that our operations connect us to groups and individuals whose vulnerability to exploitation may be heightened by socio-economic conditions, geographic isolation, or structural inequities within global agricultural systems.

This modern slavery statement, made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) (“Act”), is a joint Statement covering Export Trading Group Australia Pty Ltd (ACN 168 116 041) (“ETGA”) and ETG Processing Pty Ltd (ACN 633 731 772) (“ETGP”) (collectively, “ETG Australia”, the “Reporting Entities”, “we” or “our”) / (the “Statement”).

This Statement outlines the actions taken by ETG to identify, assess and address modern slavery risks across our operations and supply chains, including the activities of ETG Australia. reflects our continued commitment to align with international human rights standards, including the ILO Core Conventions, the UN Guiding Principles on Business and Human Rights, and relevant OECD sectoral guidance.

The Statement has been reviewed and approved by the Chief Sustainability Officer of ETG. The Statement was then reviewed and approved by the Australian Management Team for adoption in Australia.

2. Our structure, operations and supply chains

ETG is a diversified global agribusiness with integrated activities spanning origination, processing, exports, imports, manufacturing, logistics and distribution. Across more than 40 countries, ETG manages a portfolio of agricultural commodity businesses that include grains, pulses, nuts, sugar, fibres, edible oils, inputs distribution, and packaged consumer foods.

Our supply chains are broad and diverse. They include smallholder farmers, cooperatives, input suppliers, logistics providers, engineering and technical service companies, third party labour-brokers, and manufacturers of equipment, packaging and machinery.

The Group is governed through a consolidated global structure. Oversight for sustainability and human rights rests with the ETG Board, supported by the Group Chief Sustainability Officer and the Sustainability Steering Committee, oversight the group Sustainability Steering Committee is comprising the Group CEO, the Chief Sustainability Officer, senior vertical leadership, EHS leads, and risk and compliance representatives. Sustainability, EHS, supply chain and human rights specialists sit within the Group Sustainability function



and work alongside business verticals to embed policies and implement monitoring processes.

The ETG Sustainability & CSR Policy outlines expectations on labour practices, environmental management, responsible sourcing and community engagement.

ETG Australia's operations include procurement, storage, transport and sale of agricultural commodities; distribution of agricultural inputs; and partnerships with logistics, warehousing and processing service providers. Our engagement with farmers, transport operators, technical contractors and warehousing services creates supply chain relationships that require consistent oversight and due diligence.

3. Our approach to Modern Slavery risks in our operations and supply chains

ETG's assessment of modern slavery risks draws on internal due diligence, our Environmental and Social Management System (ESMS), country and commodity risk data, and engagement with suppliers and operational teams.

ETG undertakes structured assessments to identify modern slavery risks across both operational and supply chain contexts. Within Australia, our directly employed workforce is low-risk due to strong labour regulation and formal employment arrangements. Elevated risks, however, exist in areas involving subcontracted labour, such as seasonal site work, cleaning, security and logistics operations.

More substantial risks appear in global sourcing regions where ETG interacts with smallholder farmers, intermediaries and manufacturers. Risks in these regions include informal labour arrangements, recruitment practices that create indebtedness, absence of formal contracts, inadequate monitoring, and limited grievance access. These patterns mirror global modern slavery risk indicators across agricultural supply chains.

4. How ETG identifies and addresses Modern Slavery risks

ETG continues to strengthen its due diligence and monitoring processes across several operational and supply chain areas. Our approach is grounded in the ETG Sustainability & CSR Policy and the human rights commitments set out for the Group.

Our ESMS (Environmental Social Management System) is a global governance framework that integrates ESG, human rights and labour standards into operational decision-making. The ESMS provides structured processes for risk screening, escalation and monitoring across the business.

Our group-wide policies prohibiting forced labour, bonded labour, child labour and unethical recruitment, include:

- The Sustainability & CSR Policy,
- Human Rights commitments in our various sourcing guidelines



- ETG Group Code of Conduct,
- ETG Supplier Code of Conduct,
- ETG Sustainable Sourcing Policy
- Internal and External grievance procedures

These are further guided by local and regional regulatory and compliance requirements as well as our commitment and alignment with various international Environmental Safe guards such as the IFC Performance Standards, ILO convention. We regularly review and update our policies to reflect the changing landscape, with input from in-house experts and external stakeholders.

Supplier and stakeholder expectations

Supplier expectations are communicated through ETG's Supplier Code of Conduct and related policies. Suppliers engaged during the period were assessed against these expectations, and those in higher-risk categories were subject to enhanced due diligence.

Supplier onboarding includes labour-related screening self-assessments and acceptance of ETG Supplier Code of Conduct, with higher-risk suppliers subject to additional assessments where required. Supplier self-assessments are applied in relevant categories to assess best practice in labour related issues such recruitment, wage practices, working conditions, local labour law regulatory compliance document handling, and subcontracting arrangements.

ETG's continued implementation and review of our ESMS, provides structured guidance for evolving risk identification, site assessments, escalation and corrective action planning. Operational teams are supported by the Group Sustainability team (includes EHS) and commodity sustainability heads and specialists to observe labour conditions during visits and engagements with logistics partners, suppliers and community stakeholders.

ETG is also engaged with smallholder farmers and community groups through our various outreach and farmer extension services, in various sourcing regions. Our extensive farmer outreach programmes include and are not limited to raising awareness of labour standards, child labour prevention and responsible recruitment practices. These programmes aim to address underlying socio-economic vulnerabilities that can lead to any potential exploitation and assesses potential risks and opportunities for mitigation in these supply chains.

5. Assessing the effectiveness of our actions

ETG assesses the effectiveness of its modern slavery actions through a combination of quantitative metrics and qualitative insights. These include supplier coverage under the Supplier Code of Conduct, self-assessments and due diligence completed for high risk activities and commodities, corrective action progress, EHS inspection outcomes, and internal sustainability reporting.



ETG Modern Slavery Statement

ETG continues to improve its internal systems by enhancing traceability tools, establishing stronger data capture for supplier assessments, and increasing oversight of labour providers in higher-risk markets.

6. Consultation with controlled entities

This Statement was prepared through consultation across ETG's Australian operations, Group Sustainability Committee, Group HR and Group Sustainability department. ETG's vertically integrated governance model ensures consistent application of policies and processes to all controlled entities.

The Australian management team will continue to review the effectiveness of the controls in place to manage modern slavery risks in its supply chain and make any necessary improvements when required. Future training to educate the business regarding mitigation of modern slavery risks will continue.

7. Approval

This Modern Slavery Statement was approved by the Chief Sustainability Officer of Export Trading Group on December 2nd 2025. The Australian Management team has review and approved the policy subsequently on December 5th December 2025. The Management team contains key personnel including the Australian Directors and form the principal governing body of Export Trading Group Australia and its subsidiaries.

Signed:

A handwritten signature in blue ink, appearing to read 'Cassandra Tipler', is written over a horizontal line.

Cassandra Tipler

Country Head and Chief Financial Officer

Director of Export Trading Group Australia Pty Ltd