

Isis Central Sugar Mill Co. Ltd – Modern Slavery Statement



Introduction

Isis Central Sugar Mill Co. Ltd. ACN 009 657 078, an unlisted public company, is a mandatory reporting entity subject to the *Modern Slavery Act 2018* (Act). The Act requires reporting entities subject to the Act, to produce an annual modern slavery statement – this is our first submission. This statement is for financial year 1 June 2023 to 31 May 2024 and is due on 30 November 2024.

This statement outlines how we identify and manage the risks of modern slavery in our operations and supply chains.

Mandatory Criteria

This statement addresses the seven criteria under the Act:

1. Identify the reporting entities
2. Describe the reporting structure, operations and supply chain
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entities
4. Describe the actions take to assess and address these risks including due diligence and remediation processes
5. Describe how the reporting entities assess the effectiveness of the actions
6. Describe the consultation processes for the reporting entities
7. Provide any other relevant information

Reporting Entities

This statement is made on behalf of Isis Central Sugar Mill Co. Ltd., the reporting entity, and its related entities:

- ICSM Investments Pty Ltd ACN 600 373 617;
- Isis Central Sugar Mill Plantations Pty Ltd ACN 156 215 388; and
- Isis Cane Services Pty Ltd ACN 113 959 078,

(collectively, **ICSM**).

These related entities have nil or limited operations. ICSM Investments Pty Ltd owns small parcels of land that rail line is built on or for easements. Isis Central Sugar Mill Plantations Pty Ltd owns cane farmland that is leased to farmers supplying sugar cane to ICSM. Isis Cane Services Pty Ltd leases a small number of farms which it sub-leases to cane growers. For this financial year, it also operated one small cane farm.

ICSM is headquartered at Kevin Livingston Drive, Isis Central, QLD. 4660

ICSM's History

In 1894, Isis Central Sugar Mill Co. Ltd. was registered as a company and the first sugar cane crush commenced on Tuesday 7 September 1897. Many changes to farming, milling and the economy have occurred over the intervening years, but our business remains central to the community. We are a proud, locally owned company that pride ourselves on the efficient and reliable operation of our sugar mill and delivering a sustainable service to our grower-supplier shareholders.



Our Operations

Our core business is the primary processing of sugar cane using traditional mechanical and chemical transformation methods. We manage the logistics of moving cane from farm to the Mill via both a fleet of trucks and using cane rail bins on a private rail network. ICSM owns the locomotives, rolling stock and rail track. The fleet of trucks and the drivers that we use to deliver cane to the Mill are supplied by contractors. Part of the logistics management is outsourced.

At present, there are approximately 200 growers supplying sugar cane to the Mill and the cane is harvested from an area of approximately 16,600 hectares. All the cane is delivered to the Mill over 153 kilometres of narrow gauge (610mm) railway. The Mill has, in a single season, processed 1,505,400 tonnes of cane for the production of 223,874 tonnes of raw sugar.



Our products include raw sugar, molasses and electricity (made from renewable sugarcane bagasse) through our commercial arrangement with Sustainable Energy Infrastructure (**SEI**), delivering dispatchable base load power to the grid.

Raw sugar is exported via the port of Bundaberg through a marketing arrangement with Queensland Sugar Limited.

Molasses is a co-product from milling sugar cane and is sold domestically as a livestock feed.

Mill mud and ash are other by-products that are used for fertiliser and sold back to farmers in a cyclical process.

Our Supply Chains

ICSM's main suppliers are farmers supplying sugar cane to the Mill. Our other suppliers are of services and products, including:

- Trucks and drivers that deliver cane to the Mill
- Logistics management
- Milling equipment
- Chemicals for processing sugar cane

- Freight of mill mud and sugar
- IT hardware
- Uniforms and PPE

We do not import anything from overseas and only directly buy from Australian suppliers.

Our People

We employ more than 200 people in our business during the crushing season from June to November, in both permanent and seasonal employment, with reduced numbers during the maintenance season of approximately 190. Salaried roles make up 37 of those jobs with the balance being wages positions. Contractors are engaged on commercial terms as required with their employees adhering to all ICSM policies. No labour hire firms are used.

The roles encompass the full range of positions required to run a manufacturing and transport business including human resources, engineering, operations, accounting, trades, administrative, purchasing, information technology, processing and management.

Identifying Modern Slavery Risks

ICSM is currently in the early stages of developing a framework to assess and address our modern slavery risks.

We consider the risks of modern slavery to be relatively low within our operations due to the legislative framework within which we operate, and the policies and management procedures we have in place for our workers and contractors.

Our assessment of our operations is guided by the experience of our long-serving staff with a detailed knowledge of our business.

We have reviewed our suppliers at a high level to identify which suppliers may be a higher risk due to its sector and/or the region in which it operates. This review was informed by staff awareness discussions to draw together the relevant people and knowledge on these risks.

We consider that the risks of modern slavery in our supply chains to be relatively low due to our suppliers being based in Australia a low-risk region. However, we recognise that within our supply we have suppliers from particularly high-risk sectors being the agricultural, chemical and garment sectors. We also recognise that our risk of modern slavery practices increases where our suppliers utilise third party suppliers which

ICSM does not have oversight over. We have not identified any suppliers from high-risk countries.

Actions to Address Modern Slavery Risks

We consider that ICSM addresses modern slavery risks through complying with legislative frameworks and through our internal policies and procedures. These frameworks, policies and procedures include our:

- Code of Conduct for workplace behaviour
- Whistleblower and Employee Assistance Programs
- Enterprise Bargaining Agreements
- Internal and External Audit of payment systems
- Adherence to National Employment Standards, including confirming working rights of prospective employees

The Board of Directors and management have received briefings on the company's obligations regarding modern slavery.

We also performed an internal audit of our Payroll systems to confirm accurate payments were made to employees in accordance with our Enterprise Bargaining Agreements and contractual obligations. Our accounts and corporate practices are externally audited in accordance with Australian Securities and Investments Commission's requirements for a public company.

Assessing the Effectiveness of Actions Taken

ICSM's assessment of the effectiveness of the above actions is limited to the feedback received in discussions with our relevant people, management and Board of Directors.

For the next reporting period, ICSM intends to undertake a review by senior management to assess the appropriateness and effectiveness of the response to modern slavery.

Consultation with Owned Entities

The ICSM entities have the same Directors and are managed by the same staff. As a result, consultation has occurred within ICSM through its shared directors and management.

Other Relevant Information

In the year ahead, we are considering:

- how best to engage with our suppliers to understand their risks, including by:
 - conducting an internal review of the areas of risk, control measures and reporting with members of human resources, purchasing and department managers; and
 - programming engagement with suppliers during the year regarding requested responses,
- what are appropriate control measures to implement to mitigate modern slavery risks, in particular implementing an appropriate supplier code of conduct to capture modern slavery matters.

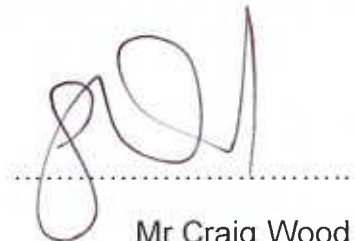
This statement was approved by the Board of Directors of the reporting entity and its related entities covered by this statement on 24 October 2024.



Mr Shaun Tobin

CHAIRMAN

Dated: 31-10-24



Mr Craig Wood

CHIEF EXECUTIVE OFFICER