



## 2025 Modern Slavery Act Statement

Australian Agricultural Company Limited

ACN 010 892 270

&

A.A. Company Pty Ltd

ACN 010 317 067

23 September 2025



# 2025 AACo Modern Slavery Act Statement

## Introduction

This Modern Slavery Act Statement (**Statement**) has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**) for the period 1 April 2024 to 31 March 2025.

This Statement outlines practices of Australian Agricultural Company Limited (**AACo**) which identify, manage, and address modern slavery risks in its operations and supply chain, and provides an update on AACo's intentions for the coming reporting period.

The numbered sections of this Statement correspond with each of the reporting criteria under the Act.

## Criteria 1: Reporting entities

This Statement covers AACo and each of its controlled entities (**AACo Group**). The reporting entities included in this statement are:

- **Australian Agricultural Company Limited** (ACN 010 892 270)
- **A.A. Company Pty Ltd** (ACN 010 317 067)

In addition, AACo owns, controls, and operates various subsidiary entities who are non-reporting entities under the Act, a full list of which can be found in the most recent AACo 2025 Annual Report available at [aaco.com.au](http://aaco.com.au).

This Statement has been prepared for AACo Group as a whole. Where this Statement refers to "AACo" it is a reference to the AACo Group.

## Criteria 2: AACo's structure, operations, and supply chain

### Structure

AACo is a public company listed on the Australian Stock Exchange with 20 wholly owned and controlled subsidiary entities as of 31 March 2025. The majority of the controlled entities are incorporated in Australia and operate solely within Australia. One controlled subsidiary incorporated in Australia has operations in Singapore, and four others are incorporated and operating in the United States of America. The primary functions of these foreign entities are to employ sales and marketing personnel and to perform treasury functions relating to the sale of products in their respective jurisdictions.

The reporting entities identified under Criteria 1 have the following functions:

- Australian Agricultural Company Limited is the listed parent entity and head of the AACo Group
- A.A. Company Pty Ltd is a trading entity

### Team

AACo maintains a diverse and inclusive workplace, recognising that its global workforce contributes to its success. As of 31 March 2025, AACo and its subsidiary entities collectively employed a total of 511 employees. This workforce includes 457 permanent employees and 54 temporary employees, which includes casual workers and employees on temporary contracts. Most of AACo's employees are based across its locations in Australia, with 16 workers operating remotely in international markets including the United States of America (USA) and Singapore.



Over the reporting period, AACo has employed 56 workers under Australian visas. As an approved sponsor, AACo adheres to various obligations in respect of visa workers, such as providing equivalent terms and conditions of employment, providing a reasonable standard of accommodation, and avoiding discriminatory recruitment practices. To assist with fulfilling these obligations, AACo partners with a trusted external adviser who specialises in immigration. This advisor is a Registered Migration Agent (RMA) operating under the Australian Government's Code of Conduct for RMAs. AACo's support of visa employees is a component of its broader strategy to attract and retain top talent from around the world.

## AACo Operations

AACo is a fully integrated branded beef business with three principal activities:

- Sales and marketing of high-quality branded beef into global markets;
- Production of beef including breeding, backgrounding and feedlotting; and
- Ownership, operation and development of pastoral properties.

As of 31 March 2025, AACo managed operations across a vast expanse of 6.5 million hectares, overseeing approximately 456,000 head of cattle across 19 owned cattle stations, 3 leased stations, 2 owned feedlots, 2 owned farms and 1 leased farm, located throughout Queensland and Northern Territory.

Beyond the Australian operations, AACo has established sales and marketing activities in Singapore, South Korea, Europe, the UAE and the USA. AACo activities in these regions are focused on the sale and marketing of products within these key international markets.

## AACo's Supply Chain

AACo boasts an extensive supply chain. Typically, AACo cattle are raised on grass for approximately 15 months before being finished on grain for around 300 days, after which they undergo processing and distribution.

During the reporting period, AACo engaged a network of 1,814 direct suppliers, the majority of whom are based in Australia. These suppliers, ranging from small family-owned businesses to large multinational corporations, provide goods and services essential to AACo operations, including equipment, machinery, vehicles, fencing, trucking, and contract mustering and farming services. AACo also have established partnerships with Australian suppliers of grain and feed, meat processing services, cold storage companies, logistics and shipping companies and freight forwarders.

While the majority of AACo's procurement activities are concentrated in Australia, AACo also sourced goods and services from 18 other countries during the reporting period, including from the USA, Canada, Hong Kong, Singapore, South Korea, the Philippines, Thailand, Sri Lanka, Israel, the UAE, the Netherlands, Italy, Spain, France, Switzerland, Ireland, and the UK. These international suppliers deliver a range of goods and services, including administration, sales, marketing, and distribution functions, for branded beef to global markets, as well as various back-office functions.

In the final stages of AACo's supply chain are their distribution partners, which play an important role in delivering AACo products to end consumers. During the reporting period, AACo, through these distributors, sold high-quality branded beef to restaurant customers both domestically and internationally, with key markets including South Korea, the USA, Canada, the Netherlands, the UK, Germany, Switzerland and Ukraine.



### Criteria 3: Risks of modern slavery practices in AACo's operations and supply chain

The latest available 2023 edition of the Global Slavery Index (GSI) reports that Australia has a relatively low prevalence of modern slavery. However, globally, the agriculture sector is considered high-risk due to its reliance on low-skilled, seasonal and migrant workers. In this context, AACo recognizes the risk that it could cause, contribute to or be otherwise directly linked to modern slavery practices. Set out below is an explanation of how these risks relate to AACo's operations and supply chain, and how AACo seeks to mitigate such risks.

#### Risk in AACo operations

AACo is aware of potential modern slavery risk factors within its operations. These risks are influenced by several factors inherent to AACo's industry and operating model:

1. **Remote Locations:** Workers located in isolated areas have increased exploitation vulnerability due to the challenges in getting consistent oversight of activities. Due to the remote locations of AACo's stations the Company is responsible for the provision of accommodation for workers and their families. In this way AACo is directly responsible for the living conditions of employees.
2. **Seasonal Workforce Demand:** The nature of AACo's business entails seasonal employment, leading to fluctuations in workforce demand and the use of temporary and casual labour, which can be more susceptible to modern slavery practices.
3. **Migrant Workers:** The employment of workers under Australian visa arrangements, who may depend on their employer for both legal status and livelihood, poses a higher risk for exploitation and modern slavery.

While acknowledging these risk factors, we assess that the risk of AACo causing, contributing to or being directly linked to modern slavery is low, based on the employment practices and legal frameworks in place, as well as ongoing efforts to continually improve the AACo employee experience.

While acknowledging these risk factors, we assess that the risk of AACo causing, contributing to or being directly linked to modern slavery is low. In making this assessment we consider the employment practices and legal frameworks in place, as well as ongoing efforts to continually improve the AACo employee experience.

The overwhelming majority of AACo's workforce is based in Australia with minimal reliance on employees working on Australian visas, as outlined under Criteria 2.

AACo enters into individual employment contracts with employees in Australia and internationally which establish clear employment terms and conditions in compliance with applicable labour laws and regulations in each jurisdiction. AACo's employment terms and conditions are underpinned by the Fair Work Act and the National Employment Standards.

At AACo, employees are valued and their wellbeing is prioritised as part of AACo's commitment to ethical employment practices. AACo has management practices in place to monitor and uphold its commitment to fair employment conditions, employee well-being, and diversity and inclusion.



## Risk in AACo's supply chain

AACo's supply chain also carries potential risks related to modern slavery. These risks are primarily associated with specific product and service categories, as well as the geographical locations of some of AACo's suppliers:

1. **High-Risk Product Categories:** Certain categories, such as electronics, petroleum products, and garments, are recognised by the GSI and other sources as having higher risks for modern slavery due to the nature of their production processes and labour practices.
2. **Supplier Geographical Locations:** Engaging suppliers from international markets with higher incidences of modern slavery can expose AACo to risks of being directly or indirectly linked to unethical labour practices through such third-party suppliers' activities.

The following are specific measures AACo implemented to mitigate these risks and uphold ethical practices:

- Due diligence is undertaken on new suppliers and distributors prior to being onboarded with AACo. Counterparties are required to respond to AACo's onboarding questionnaire, which includes questions which are used to highlight modern slavery risk and requires them to complete a modern slavery attestation. Contractors undertake an onboarding program which supports understanding and following relevant AACo policies and procedures, including in relation to management of modern slavery risks in AACo's supply chain and operations.
- AACo's procurement model for raw materials such as grain, fuel and other inputs is based on long-term relationships with predominantly Australian suppliers who have passed through AACo's due diligence process. For instance, supplements used in AACo's proprietary lick block formula are sourced from Australian suppliers, with the exception of molasses which is sourced from a long-term supplier located in Vietnam.

## Criteria 4: Actions taken to assess and address modern slavery risks

AACo's approach to assessing and addressing modern slavery risk is guided by its Modern Slavery Working Group, chaired by the Company Secretary and General Counsel. Members of the Group include leaders from the Finance, Legal, Risk, Compliance, Shipping & Logistics, and People & Culture teams. The Working Group meets at minimum annually to explore strategies for further embedding better practice into AACo's operations and enhancing AACo's modern slavery risk controls.

### Actions taken to assess modern slavery risks

AACo implemented a number of activities to facilitate the assessment of modern slavery risk in its operations and supply chain:

#### Employee Training and Awareness

AACo focuses on training and raising awareness about modern slavery issues to foster conditions within AACo where employees can identify and report potential risks, allowing AACo to effectively assess the extent of these risks within AACo's organisation and supply chain.

AACo's employees complete an online training module designed to improve their understanding of how to identify and report suspected instances of modern slavery. This comprehensive module concludes with an



assessment to measure respondents' knowledge and understanding of the concepts presented. All Executives and Senior Leaders have completed this training, underscoring their commitment and acknowledgement of the importance of this training. The training has a 97.5% completion rate among the broader business.

All people managers across the business are required to complete an annual online module on sexual harassment. The training includes an overview of the identification of sexual harassment behaviours, its prevalence, why it is under-reported as well as how to respond when allegations of inappropriate workplace behaviours are reported.

### **Grievance platform**

AACo's *Speak Up* initiative empowers employees to report any work-related grievances, encompassing a wide range of issues including health and safety concerns, allegations of discrimination, harassment, sexual harassment and bullying. 'Speak Up' provides a dedicated online platform and hotline for anonymous reporting, eliminating perceived or actual barriers that might deter employees from feeling safe when raising concerns. The platform also serves as a repository for data and analytics, enabling real-time insights to support ongoing monitoring and review of modern slavery risks. 'Speak Up' is featured on AACo's official website, advertised internally in both paper and electronic format (featured on AACo's intranet page) and reference to 'Speak Up' is included in annual employee training.

### **Whistleblower platform**

AACo's *Speak Up* initiative is complemented by a secure whistleblower platform supported by 'Your Call' platform. The 'Your Call' platform provides employees and other stakeholders with a secure and anonymous means of raising concerns without fear of repercussions, while also enabling management to conduct investigations while safeguarding the whistleblower's anonymity. Employees are made aware of the platform and its hotline during their onboarding process and through recurring annual staff training. 'Your Call' is also featured on AACo's official website, AACo's intranet page and advertised internally in both electronic and paper-based format.

AACo also engaged a third-party provider to conduct a Whistleblower training for the executive team and people managers. The training covered how to identify when a complaint may be a Whistleblower complaint and how to action a Whistleblower complaint.

### **Modern slavery risk assessment for suppliers**

AACo undertakes an annual third-party supported modern slavery risk assessment across all material suppliers. During the reporting period, AACo had 1,814 direct suppliers which were subject to this assessment. Based on the results of this assessment, no AACo suppliers were identified as high-risk, and the substantial majority were assessed as having a low or very low risk of modern slavery within their operations.

Palm oil is a commodity which carries with it a heightened risk of modern slavery in its supply chain due to primary producers largely being in Malaysia and Indonesia. AACo had previously used palm oil in its cattle feed and lick block formulas. AACo had sourced palm oil from a reputable Australian supplier. In the last reporting year, AACo has phased out the use of palm oil in its supply chain, with its last delivery of palm oil dated in July 2024.



## Actions taken to address Modern Slavery Risks

### Internal Policies

While AACo's rigorous employment practices are an effective preventative measure for modern slavery risk, residual risk is mitigated by a suite of internal policies, which are designed to safeguard employees and actively encourage them to raise any concerns they may have. AACo regularly reviews its policies, procedures, and working documents to appropriately address standards of professional conduct and responsible business fundamentals, including human rights and ethics.

Policy	Purpose
Modern Slavery Policy	AACo's Modern Slavery Policy affirms AACo's commitment to contribute to ending all forms of modern slavery. This policy provides a structure for the Company's approach to reducing the risk of modern slavery practices within its operations and supply chains.
Code of Conduct	AACo's Code of Conduct provides a framework to help maintain high standards of individual behaviour in alignment with AACo's values. Under the Code, everyone at AACo, including employees, contractors, board members, consultants, volunteers, and casual or temporary workers, are expected to uphold the AACo values and conduct themselves in accordance with the highest ethical standards, including by respecting human rights and working to mitigate the risks of modern slavery practices in AACo's operations and supply chain.
Risk Management Policy	AACo's Risk Management Policy recognises AACo's exposure to risks, including modern slavery risk, establishes that "risk management is everybody's business" at AACo, and champions effective risk management as a strategic strength of AACo. Modern slavery risks identified in AACo's operations or supply chain will be managed in accordance with this Policy.
Whistleblower Policy	AACo's Whistleblower Policy details the mechanism through which a report of wrongdoing (including in respect of any modern slavery risk) can be made and describes the comprehensive protections and support available for whistleblowers, including assurance that any report would be kept confidential and investigated fairly.
Respecting Each Other Policy	AACo's Respecting Each Other Policy is a workplace behaviour policy that clearly outlines AACo's zero-tolerance approach to any form of bullying, harassment, sexual harassment, discrimination, or vilification. This policy provides clear definitions and examples of each of these behaviours and offers information on grievance escalation processes.
Recruitment & Selection Policy	AACo's Recruitment and Selection Policy supports the appointment of the most qualified individuals to each role. This policy aligns with Equal Opportunity Legislation and strives to eliminate any unfair discrimination and bias in AACo's recruitment and selection process.

### Supplier onboarding

AACo has a new suppliers onboarding and due diligence process which includes a modern slavery declaration confirming that they are not engaging in modern slavery practices, that they are meeting their reporting requirements, and that they have implemented policies and processes to mitigate modern slavery





risk. Additionally, they must inform AACo of any modern slavery incident and provide any necessary information to verify compliance with AACo's standards.

Where initial due diligence identifies risk factors (such as a major supplier in an industry flagged as higher risk) then AACo will engage in direct discussion with that supplier to understand initiatives and actions taken to prevent modern slavery risks.

### Supplier engagement

Based on the results of the annual third-party modern slavery risk assessment, where suppliers are identified as being potentially high-risk, AACo engage with them directly to understand their stance and approach to managing modern slavery risk. No suppliers were flagged as high risk in the current year risk assessment.

### Reporting

During the reporting period, AACo did not identify any instances of modern slavery in its supply chain or operations. Consequently, no remediation actions were required or took place.

AACo recognises that transparent reporting is fundamental in addressing modern slavery risks within its operations and supply chain. AACo's actions in this regard include:

1. **Annual Modern Slavery Act Statements:** AACo annually publishes a Modern Slavery Act Statement that details AACo's commitment to combat modern slavery, the steps taken to assess and mitigate risks, and the progress made during the reporting period. These statements align with statutory obligations and provide stakeholders with a clear understanding of its efforts.
2. **Board and committee oversight:** the Board and the Audit and Risk Management Committee play a crucial role in overseeing the reporting on modern slavery risks. It monitors the information presented in AACo's Modern Slavery Act Statements is consistent with AACo's actions and reflects the integrity of its efforts.

### Actions planned for FY26

In the next reporting period, AACo intends to build upon progress made in previous reporting periods through the following actions:

Action	Description
<b>Human Resources Information Systems (HRIS) project</b>	AACo has commenced the implementation of a new HRIS. The new system will improve verifiable data trails to demonstrate AACo's commitment to transparency, worker wellbeing, and responsible employment practices.
<b>Procurement and Contract Management project</b>	AACo has initiated a project to uplift procurement practices and embed greater governance across operations. Integration of the MDS Live assessment and questionnaire tool will be within scope to enhance supplier due diligence and monitoring. These improvements will increase accountability in procurement activities and deliver greater transparency across the AACo's supply chain.





## Criteria 5: Assessing the effectiveness of AACo's actions

AACo strives to ensure that its actions in identifying and managing modern slavery risks are both impactful and subject to continuous improvement. AACo assesses the effectiveness of its actions by:

1. Tracking AACo's actions and outcomes to consider whether actions are not only implemented but also addressing the targeted risks.
2. AACo compares its actions with those being deployed by AACo's peers and others in the market and periodically seeks external advice to refine AACo's strategies and stay aligned with best practices.

### Progress Update on FY25 Initiatives

In its FY24 Modern Slavery Act Statement, AACo outlined its initiatives for the FY25 reporting period. AACo is pleased to provide an update on its progress against these initiatives:

Action	Progress
<b>Live modern slavery assessments when onboarding suppliers and distributors and supplier questionnaires</b>	AACo has procured licensing for a third-party provider to enable its supplier onboarding team to conduct Live Assessment of prospective suppliers at the onboarding stage. The Company is in the process of embedding this tool into the existing supplier onboarding process.
<b>Review of AACo Code of Conduct</b>	<p>At the time of this report, AACo's Code of Conduct has been refreshed and submitted to the Board for approval, with expectation it will be fully rolled out with the implementation of HRIS.</p> <p>The updated Code of Conduct affirms AACo's commitment to ethical employment practices, ethical sourcing, supply chain transparency, and the expectation that all employees, contractors and suppliers:</p> <ul style="list-style-type: none"><li>• Uphold human rights and fair labour practices in accordance with AACo's Modern Slavery Policy and the Modern Slavery Act 2018 (Cth);</li><li>• Report any concerns regarding exploitation, forced labour, child labour, or unethical workplace practices; and</li><li>• Ensure that business dealings align with AACo's commitments to ethical sourcing and supply chain transparency.</li></ul>

## Criteria 6: Consultation process

This Modern Slavery Act Statement has been made on behalf of AACo and its 20 controlled entities, including A.A. Company Pty Ltd which is also a reporting entity. AACo has entities which are incorporated in the USA and Singapore. The controlled entities in the USA and Singapore are predominantly used for sales and marketing purposes. AACo's controlled entities are administered by the same teams, processes, policies used by the parent entity. Hence, they are also captured by the MDS live assessment.

AACo's controlled entities are wholly owned and controlled by AACo. Accordingly, AACo did not consider that formal consultation with its controlled entities was necessary or useful in preparing this Modern Slavery Act Statement. AACo and its controlled entities are treated as one operational entity from a corporate governance perspective and each of the controlled entities is covered by AACo's policies, procedures, and systems, including those relating to human resources, contracts and contractor management, and procurement



### **Criteria 7: Provide any other relevant information**

Relevant additional information has been included within each of the criteria above.

### **Criteria 8: Approval**

This Modern Slavery Act Statement was approved by the Board of AACo on behalf of both reporting entities covered by this statement, AACo and A. A. Company Pty Ltd, on ***23 September 2025***.

David Harris

Managing Director & Chief Executive Officer

### **Registered Office**

Level 1, Tower A, Gasworks Plaza, 76 Skyring Terrace, Newstead QLD 4006