



MODERN SLAVERY STATEMENT 2021-22

Reporting period: 1 July 2021 - 30 June 2022

Prepared pursuant to the Modern Slavery Act 2018 (Cth)

AUSTRALIAN GRAIN EXPORT PTY LTD

ABN 92 073 563 185 | ACN 073 563 185

Contents

About this Statement	3
Message from the Managing Director	3
1. Reporting Entity, Structure and Operations	4
2. Our Supply Chains	5
3. Identifying Modern Slavery Risks	6
4. Actions Taken During the Reporting Period	8
5. Assessing the Effectiveness of Our Actions	9
6. Consultation Process	10
7. Continuous Improvement and Future Priorities	10
8. Approval and Signature	11
Annexure - Mandatory Reporting Criteria	12

About this Statement

This Modern Slavery Statement is made by Australian Grain Export Pty Ltd (ABN 92 073 563 185, ACN 073 563 185) (Australian Grain Export or AGE) for the financial year from 1 July 2021 to 30 June 2022.

The Statement describes AGE's structure, operations and supply chains; the modern slavery risks relevant to those operations and supply chains; the actions taken during 2021-22; how AGE assessed the effectiveness of those actions; and the consultation process relevant to the reporting period.

Basis of preparation

This Statement has been prepared to address AGE's 2021-22 reporting period using contemporaneous records. These include Australian Border Force feedback received in August 2021, internal management correspondence responding to that feedback, Employee Handbook Version 5 updated in October 2021, a Work Health and Safety Policy dated 1 November 2021, and related Chain of Responsibility and transport-provider documents.

Message from the Managing Director

Australian Grain Export recognises its responsibility to conduct business ethically and with respect for human rights. Modern slavery can occur in complex supply chains, including in agriculture, transport and logistics, international shipping and the manufacture of goods used by businesses.

During 2021-22, AGE took identifiable steps to strengthen its modern slavery framework. Following Australian Border Force feedback on its first statement, senior management reviewed the reporting requirements and progressed modern slavery controls through the Employee Handbook, Work Health and Safety and Chain of Responsibility documentation, reporting protections and supply-chain assurance tools.

AGE is committed to strengthening its understanding of modern slavery risks, improving supply-chain visibility and building proportionate governance, due diligence, reporting and remediation processes over successive reporting periods.

Tim Martin

Managing Director
Australian Grain Export Pty Ltd

1. Reporting Entity, Structure and Operations

1.1 Reporting Entity

Australian Grain Export Pty Ltd is an Australian grain accumulation, trading and export business operating within the Australian agricultural supply chain. The reporting period covered by this Statement is 1 July 2021 to 30 June 2022.

Reporting entity	Australian Grain Export Pty Ltd
ABN	92 073 563 185
ACN	073 563 185
Reporting period	1 July 2021 - 30 June 2022
Principal governing body	Board of Directors

1.2 Organisational Structure

During the 2021-22 reporting period, AGE's principal operational sites were located at Dublin, South Australia, and Rupanyup, Victoria, with a corporate office in Adelaide, South Australia.

AGE maintains a permanent workforce and engages additional casual employees to support peak harvest operations. AGE also trades grain from other Australian regions and, where grain is not handled through AGE-operated facilities, uses third-party providers for receipt, storage, handling, transport and port-related activities.

1.3 Operations

AGE's principal activities during the reporting period included the accumulation, storage, handling, trading and export of Australian grain and pulse commodities. Core commodities included:

- Wheat
- Barley
- Lentils
- Faba beans
- Field peas
- Chickpeas
- Lupins

AGE connects Australian growers and grain suppliers with domestic and international markets. Its activities include grain receipt, storage and handling at its operational sites, commercial trading activities, coordination of road and rail movements, use of third-party storage and handling infrastructure, and coordination of port and ocean freight services for export.

2. Our Supply Chains

AGE's supply chain supports the accumulation, storage, handling, trading and export of agricultural commodities. The principal categories of goods and services relevant to the 2021-22 business model were:

Supply-chain category	Description
Grain and agricultural commodities	Australian-grown grain and pulse commodities sourced from growers and other participants in the Australian grain market.
Grain receipt, storage and handling	AGE-operated facilities at Dublin and Rupanyup, supplemented by third-party storage and handling facilities where required.
Transport and logistics	Road freight, rail freight and associated logistics services used to move commodities between growers, storage facilities, AGE sites and ports.
Ports and ocean freight	Port, terminal, freight-broker, shipping line and related services used to export grain to international customers.
Operational goods and equipment	Tarpaulins, bunker and site consumables, equipment, replacement parts, information technology equipment and other operational supplies.
Technical and professional services	Maintenance, repairs, engineering, technical, administrative and professional services.

2.1 Geographic Reach and Third Parties

AGE's commodities are predominantly Australian-grown. However, the supply chain extends beyond AGE's own sites through third-party grain handlers, storage providers, road and rail operators, port and terminal providers, freight brokers and shipping lines. AGE may also purchase products from Australian suppliers whose manufacturing supply chains extend overseas.

2.2 Supply-chain Overview

Australian growers / grain suppliers → **AGE or third-party storage** → **Road / rail logistics** → **Port / terminal** → **Ocean freight** → **International customer**

AGE generally has greater visibility over its own operations and direct Australian suppliers than over workers and employment practices deeper in outsourced or international supply chains. This difference in visibility is relevant to AGE's assessment of modern slavery risk.

3. Identifying Modern Slavery Risks

Modern slavery has the meaning given by the Modern Slavery Act 2018 (Cth) and encompasses serious forms of exploitation including slavery, servitude, forced labour, trafficking in persons, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

AGE recognises that modern slavery risk concerns the risk to people, not merely risk to the business. In considering where exposure may arise, AGE has regard to the nature of the industry, workforce vulnerability, subcontracting, geographic reach, the complexity of the supply chain and the degree of visibility over employment conditions.

3.1 Risk in AGE's Own Operations

AGE's directly controlled operations are predominantly Australian. Direct management of employees and facilities provides greater visibility over employment arrangements than AGE has in deeper tiers of its supply chain. Nevertheless, seasonal and casual work associated with grain harvest can create worker vulnerability if appropriate employment and workplace controls are not maintained.

Potential areas requiring attention include recruitment practices, payment and employment conditions, working hours during peak periods, treatment of casual workers, workplace conditions and access to mechanisms for raising concerns.

3.2 Agriculture and Grain Procurement

Agriculture is a relevant risk area because farms and agricultural businesses can use seasonal, temporary, migrant, contracted or subcontracted labour. AGE does not control the employment arrangements of independent growers or businesses further within those suppliers' operations. Potential risks include forced labour, deceptive recruitment, debt bondage and other serious labour exploitation.

3.3 Storage, Handling, Transport and Logistics

AGE relies on third-party grain handlers, storage providers and transport operators. Risks may be more difficult to identify where service providers use subcontractors or temporary labour and where AGE has limited visibility beyond its direct contractual counterparty. Road freight, rail movements, warehousing and other logistics services therefore represent areas requiring proportionate due diligence.

3.4 Ports and Ocean Freight

International shipping creates additional complexity. Shipping lines, brokers, agents, port operators, vessel crews and subcontractors may operate across multiple jurisdictions with differing labour protections and enforcement. AGE's ability to directly control those employment arrangements is limited, creating potential direct linkage to modern slavery risks through business relationships.

3.5 Equipment, Electronics and Other Goods

AGE purchases equipment, replacement parts, information technology equipment and other operational goods. Even where purchased from Australian suppliers, finished products or components may be manufactured through multi-tier overseas supply chains. Potential exposure can arise in raw-material extraction, component manufacturing and assembly, particularly where production occurs in higher-risk jurisdictions or where supply-chain visibility is limited.

3.6 Professional and Technical Services

Maintenance, engineering, technical, administrative and professional services generally present a lower relative exposure than labour-intensive or internationally connected supply chains, but subcontracting and ancillary services can still create modern slavery risk.

3.7 Summary of Key Risk Areas

Area	Potential modern slavery risk	AGE relationship / visibility
Direct workforce	Seasonal and casual work; recruitment, hours, conditions and ability to raise concerns.	Greater direct visibility and control.
Growers / agriculture	Seasonal, temporary, migrant or subcontracted labour; limited visibility into supplier employment practices.	Primarily linked through procurement relationships.
Third-party storage / handling	Contracted or subcontracted labour; reduced oversight beyond the immediate provider.	Linked through service providers.
Road / rail logistics	Subcontracting, contracted labour and reduced visibility into lower-tier providers.	Linked through logistics providers.
Ports / ocean freight	International labour, multiple jurisdictions, vessel crews and subcontracting.	Linked through shipping, freight and port relationships.
Equipment / electronics	Overseas manufacturing and deeper-tier component supply chains.	Linked through procurement of finished goods.
Professional / technical services	Generally lower relative exposure; subcontracting can increase risk.	Linked through service providers.

3.8 Risk Priorities

The areas warranting particular attention during 2021-22 were agriculture and grain procurement; outsourced storage, handling and transport; ocean freight and international logistics; and manufactured goods with complex or international production chains. These areas combine worker vulnerability, subcontracting, international exposure or reduced visibility beyond AGE's direct suppliers.

4. Actions Taken During the Reporting Period

4.1 Evidence Base and Response to Regulatory Feedback

Contemporaneous evidence

In August 2021, Australian Border Force advised AGE that its first Modern Slavery Statement required stronger coverage of actions and due diligence, effectiveness assessment and consultation. Internal correspondence shows the feedback was circulated to Directors and senior management, responsibility for strengthening the framework was discussed, and integration into AGE's Chain of Responsibility documentation was specifically identified as a priority.

The records that followed during 2021-22 show that AGE progressed this work. The strongest dated evidence is Employee Handbook Version 5, updated in October 2021, and the Work Health and Safety Policy dated 1 November 2021. Related Chain of Responsibility and transport-provider documents also contain modern slavery controls and support the actions described in this Statement.

4.2 Governance, Workforce Controls and Awareness

Employee Handbook Version 5 requires management to ensure staff and contractors are aware of relevant policies, procedures and legislation, expressly noting modern slavery. It requires employees and contractors to comply with the Code of Conduct and provides for reporting of unacceptable conduct. The Handbook also contains a dedicated Modern Slavery Policy and Guidelines section intended to address modern slavery in AGE's supply chain, provide awareness and encourage proactive reporting of suspected acts.

The Handbook states that whistleblowers reporting negative conduct, including modern slavery concerns, will be protected and supported. The Work Health and Safety Policy dated 1 November 2021 also states AGE's commitment to implementing its Modern Slavery Policy and Guidelines within the business and supply chain and provides that the policy is to be made available to workers and supply-chain entities.

4.3 Supply-chain Due Diligence and Assurance Tools

AGE's Chain of Responsibility documentation includes modern slavery requirements directed at supply-chain relationships. Historical transport-provider documents include an agreement requiring providers to confirm that their activities and those within their customer base do not give rise to modern slavery practices, to notify and correct non-compliance, and to manage subcontracted work in accordance with AGE requirements. The agreement also provides for AGE to conduct a second-party audit where required.

A related Transport Provider Evaluation form includes checks for return of the provider agreement, receipt of WHS and Chain of Responsibility policies, communication and correction of non-compliance, and whether modern slavery practices were checked with no concerns identified. These documents demonstrate that supplier-assurance mechanisms were designed into AGE's framework.

4.4 Reporting and Response

The 2021-22 framework provided internal reporting protections through the Employee Handbook and consequences for breaches through AGE's Code of Conduct and related policies. Supplier documentation also provided mechanisms to notify and correct non-compliance and to evaluate providers where required. These controls form part of the actions reported for the period.

5. Assessing the Effectiveness of Our Actions

The 2021-22 records demonstrate a clear process of identifying gaps, reviewing the framework and embedding additional controls. AGE assessed effectiveness through management review of regulatory feedback, integration of modern slavery requirements into workforce policies, and the development of supplier-assurance mechanisms.

5.1 Evidence of Review and Improvement

Australian Border Force feedback received in August 2021 identified areas requiring stronger treatment in AGE's reporting. Internal correspondence shows Directors and senior management considered that feedback and discussed assigning responsibility for systems, policies, education and practical implementation. By October-November 2021, modern slavery requirements were expressly incorporated into the Employee Handbook and Work Health and Safety documentation, with related controls reflected in supply-chain documents.

This sequence provides evidence that AGE used identified gaps to improve its framework during the period and progressively embedded modern slavery requirements into workforce and supply-chain controls.

5.2 Indicators of Implementation

The records identify several mechanisms used to monitor implementation and effectiveness:

- management and Board consideration of regulatory feedback and identified reporting gaps;
- integration of modern slavery obligations into employee conduct and policy documentation;
- protected internal reporting and whistleblowing arrangements for modern slavery concerns;
- transport-provider declarations concerning modern slavery practices and subcontracted work;
- provider evaluation criteria covering agreements, policies, non-compliance and modern slavery checks;
- the ability to investigate breaches and apply employee or contractor consequences where appropriate.

Together, these mechanisms show that AGE had developed practical ways to monitor implementation during 2021-22. Quantitative year-end measures were not yet embedded across the framework, so this Statement focuses on the documented controls, review activity and assurance mechanisms in place during the period.

6. Consultation Process

AGE did not own or control other entities during the 2021-22 reporting period. Accordingly, there were no controlled entities with which AGE was required to consult for the purposes of section 16(1)(f) of the Modern Slavery Act 2018 (Cth). Separate from that statutory requirement, Australian Border Force feedback was circulated among Directors and senior management and informed work to strengthen the modern slavery framework.

Relevant internal consultation and review during the reporting period included:

consideration of the August 2021 Australian Border Force feedback by Directors and senior management;

discussion of responsibility for systems, policies, education and practical implementation;

integration of modern slavery requirements into the Employee Handbook and Work Health and Safety Policy; and

development of related Chain of Responsibility and transport-provider assurance tools.

This internal consultation supported AGE's review and strengthening of the modern slavery framework during 2021-22.

7. Continuous Improvement and Future Priorities

AGE's 2021-22 records show meaningful development of its modern slavery framework, particularly in policy integration, reporting protections and supply-chain assurance tools. The key next step was to move from documented controls to consistently retained evidence of implementation and effectiveness.

Priority	Intended direction
Governance and oversight	Maintain Board and management oversight and retain evidence of annual review of modern slavery risks and actions.
Supplier due diligence	Apply a documented, risk-based review process to suppliers and service providers, focusing on higher-risk labour and logistics relationships.
Supplier assurance	Retain signed provider declarations, completed evaluations, follow-up records and any second-party audit evidence.
Training and awareness	Record staff communication and training, with role-specific content for employees who manage suppliers, transport and logistics.
Reporting mechanisms	Maintain protected reporting channels and retain records of concerns, investigations and outcomes.
Remediation	Develop a clearer person-centred response process in addition to disciplinary and contractual consequences.
Effectiveness	Introduce measurable annual indicators covering supplier review, awareness, concerns raised, corrective actions and management review.

AGE will continue to distinguish completed actions from intended improvements and to strengthen the evidence retained for supplier due diligence, training, reporting, remediation and annual effectiveness review.

8. Approval and Signature

Approval by Principal Governing Body

This Modern Slavery Statement was approved by the Board of Directors of Australian Grain Export Pty Ltd, being AGE's principal governing body for the purposes of the Modern Slavery Act 2018 (Cth).

Board approval date: 2 September 2026

Signature of Responsible Member

Signed for and on behalf of Australian Grain Export Pty Ltd by:

Signature: 

Name: Tom Reddecliffe

Position: Chief Financial Officer

Entity: Australian Grain Export Pty Ltd

Date: 2 September 2026

Annexure - Mandatory Reporting Criteria

This annexure identifies where Australian Grain Export Pty Ltd addresses the mandatory reporting criteria in section 16 of the Modern Slavery Act 2018 (Cth).

Mandatory requirement	Location in this Statement
16(1)(a) - Identify the reporting entity.	Pages 3-4
16(1)(b) - Describe the reporting entity's structure, operations and supply chains.	Pages 4-5
16(1)(c) - Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Pages 6-7
16(1)(d) - Describe actions taken to assess and address those risks, including due diligence and remediation processes.	Page 8
16(1)(e) - Describe how the reporting entity assesses the effectiveness of those actions.	Page 9
16(1)(f) - Describe the process of consultation with any entities the reporting entity owns or controls.	Page 10
16(1)(g) - Include any other information the reporting entity considers relevant.	Page 10
Section 13(2)(c) / 16(2)(a) - Principal governing body approval.	Page 11
Section 13(2)(d) - Signature of a responsible member.	Page 11