



FINANCIAL YEAR
2021

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 ensure Modern Slavery is not taking place anywhere in our own business or in any of our 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 under the *Modern Slavery Act 2018* (Cth) (**Act**). It sets out the risks of Modern Slavery in the operations and supply chain of Ameropa Australia Pty Ltd (ACN 009 504 394) (“Ameropa”, “us” or “we”), an entity registered in Tasmania, Australia, and actions we have taken to address and remediate such risks during the 2021 financial year.

Ameropa is a reporting entity for the purposes of the Act for the financial year 2021 (which ended on 31 December 2021). It does not own or control any other entities and this statement is submitted on behalf of Ameropa as the only reporting entity.

Our Structure, Operations and Supply Chains

Ameropa is a wholly owned subsidiary of Ameropa Trade 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 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 eight 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, Di- Ammonium Phosphate, Muriate of Potash and Sulphate of Ammonium, 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.

Ameropa currently has 190 employees, with 39 based at the Melbourne Head Office.

In the 2021 financial year, Ameropa engaged directly with more than 1,200 suppliers from 12 countries. Many of the purchases from such suppliers were of a one-off nature or were low value.

Ameropa's largest category of spending was on fertiliser.

The supply chain of products and services that contribute to our operations include:

- Sourcing raw materials from overseas and shipping those products to Australia;
- Unloading product from ships and storing it;
- Wholesale and retail distribution of products;
- Distributing products to customers;
- Manufacturing products; and
- Agronomy and spreading services.

Key Areas of Focus in 2021

Whilst Ameropa has over many years developed a number of policies and processes seeking to protect human rights and reduce the risk of modern slavery in its operations and supply chain, it has placed much emphasis on this area of corporate responsibility since the introduction of the Act.

Key Initiatives in the 2021 financial year:

1. Supplier Code of Conduct

The Supplier Code of Conduct (**Code**) defines how we do business and demonstrates our commitment to corporate social responsibility. In support of this commitment, the Code sets out the ethical standards and the level of integrity required in our business dealings. In turn, we expect all our suppliers to share the commitment to meeting these standards and values. When we initially implemented the Code, it was sent to all new suppliers. We have now implemented new procedures to share the Code (and communicate our expectations around compliance with the Code) with all suppliers.

2. Due diligence Questionnaire

To support the Supplier Code of Conduct we developed a due diligence questionnaire (**Questionnaire**) to assist us to assess the risks associated with our existing and new supplier networks. We are working in collaboration with a consultancy firm that specialises in providing due diligence activities for clients including Modern Slavery matters. Going forward this consultancy firm will manage the due diligence process and conduct an in-depth review of the responses received from each Questionnaire (whether from a new or existing supplier).

3. Modern Slavery Module

The consultancy firm provides an online platform – created in collaboration with an international law firm -- that has a Modern Slavery risk assessment database and tools. The platform has an underlying formula enabling us to assess risks of modern slavery within our supply chain as a result of suppliers' responses to our Questionnaire. The platform utilises 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. The Module enables us to risk rate our suppliers based on the following:

- Jurisdiction (country) of operations and headquarters
- Industry of supplier/industry of goods and services supplied
- Products attributed to high risk of Modern Slavery
- Workforce characteristics
- Risk-mitigating measures specific to the individual supplier

The platform has a robust, real-time analytics engine, which means we will be able to focus our efforts on high-risk suppliers and benchmark our program's effectiveness on an annual basis. It will give us the ability to report on our program via the analytics dashboard, providing a holistic picture of our supply chain to our stakeholders without manually extracting and analysing the data.

4. **Modern Slavery Policy**

Our Modern Slavery Policy (**Policy**) is an enhancement to our existing framework and sets out clear expectations for team members, contractors, and other representatives. The Policy outlines our commitment to the highest levels of ethical behavior, including zero tolerance for unethical, corrupt, or undesirable conduct.

5. **Internal training and awareness**

We are ensuring that all employees undertake specific training regarding Modern Slavery risk in business.

Our training program for employees covers the fundamental governance principles which require adherence across all our business operations. The training and awareness program includes an overview of our Code of Conduct, grievance procedure and workplace ethics. This training is provided across the whole company. Each year our employees and contractors are required to refresh their knowledge of our Code of Conduct and Conflict of Interest Policies and confirm that they have done so, as a compliance activity.

6. **Strengthening of contract clauses**

We have continued to enhance our contractual clauses in procurement contracts to specifically cover modern slavery risks. This has involved reviewing our contractual relationships and engaging with suppliers to improve and confirm that their practices and controls are adequate. These specific clauses are used to target Modern Slavery risks within our supply chain and assist in safeguarding the human rights of workers.

Risks of Modern Slavery Practices in our Operations and Supply Chains

Ameropa's operations are conducted in Australia using a workforce hired through our in-house human resources team and labour hire providers and in conformance with all Australian laws. We therefore understand that the risk of Modern Slavery in our direct operations (i.e. Modern Slavery risks that we may cause) is low. We manage our business and commercial relationships closely and therefore also understand that the likelihood of Ameropa directly contributing to Modern Slavery risks to be low.

However, our supply network is extensive, with supplies sourced from many regions of the world. Ameropa is therefore at risk of being linked to risks of Modern Slavery through its business relationships

with its suppliers and indirect suppliers. We have outlined the location of some of our key suppliers, the products, or services we source from them, and our view of the possible Modern Slavery risks attached to those arrangements.

COUNTRY	RISK	EXAMPLE OF PRODUCT/ SERVICE
Argentina	Forced labour,	Boron
Australia	Migrant labour exploitation	Third party bagging, Transport services
China	Forced labour, Fair working conditions,	Urea, Rock Phosphate, Ammonium Phosphates, Surveying, and Inspection services
India	Migrant labour exploitation, Forced Labour	FIBC Packaging
Indonesia	Migrant labour exploitation, bonded Labour,	Urea
Malaysia	Forced Labour, bonded labour, migrant labour exploitation	Urea
Saudi Arabia	Migrant labour exploitation, Forced Labour	Urea, Ammonium Phosphates, Sulphur
South Korea	Forced Labour	Sulphur
Taiwan	Forced Labour	Sulphate of Potash
Togo	Migrant labour exploitation, Forced Labour	Rock Phosphate
Turkey	Migrant Labour exploitation, Forced Labour	Sulphur
USA	Migrant labour exploitation, Forced labour	Phosphates

The actions we take to assess and address these risks

There are several actions we take to assess and address the risks of Modern Slavery in Ameropa's operations and supply chains.

1. Our Policies

Prior to the enactment of the Act, Ameropa had a longstanding set of policies in place, that are regularly reviewed, that contributed to reducing the risks of Modern Slavery. These include our Code of Conduct, our Anti- Bribery and Corruption Policy, our Whistleblower Policy, our Discrimination, Harassment and Bullying Policy and our Grievance Resolution policy. As referred to above we now also have a specific Modern Slavery Policy. Collectively, these policies are referred to as our **Policies** in this statement.

These Policies ensure that our employees and suppliers are dedicated to managing social, ethical, and environmental issues in a responsible manner and consistent with our Company Values.

At Ameropa, we value education and transparency and each of our employees and suppliers is made aware of the expectation that they will be familiar with and comply with all relevant policies. Compliance education and training for employees includes signing off on the above policies on an annual basis.

The Policies are continually monitored and updated from time to time to ensure that we approach our social, ethical, and environmental responsibilities in a contemporaneous and agile manner.

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.

2. Modern Slavery Focus

Ameropa's Executive Leadership Team (**ELT**) has adopted a focused approach to modern slavery risks and in addition to the preparation of an Ameropa Modern Slavery Statement, is working to identify Modern Slavery risks in Ameropa operations and supply chain to find ways to reduce or mitigate these risks, to develop programs, practices and procedures to enhance Ameropa's response to Modern Slavery, and to operate as a group of "thought leaders" for the organisation on the issue of Modern Slavery in a group that deals with farming, packaging and logistics suppliers.

The ELT has raised awareness of Modern Slavery risks and Ameropa's response to those risks through all areas of the Ameropa business, and this will include developing an employee education and compliance program as outlined in item 4 below.

3. Risk Mapping and Due Diligence

Ameropa has targeted new and existing suppliers with a spending threshold of over \$50,000 and sought the completion of the Questionnaire which is designed to determine the risk of Modern Slavery in suppliers' operations. In December 2021, our appointed consultancy issued 168 new Questionnaires, focusing on high value (over \$50,000).

4. Employee Education and Compliance

Ameropa has taken steps to increase employee awareness and engagement regarding Modern Slavery and has developed a Modern Slavery Policy which is available to all employees on our intranet and through our employee education program, which forms part of the Ameropa Organisational Development Plan.

Ameropa has 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. Industry discussions

Ameropa has an ongoing and active dialogue with several of its key suppliers and customers as well as Industry groups such as Fertiliser Australia and International Fertilizer Association (IFA) regarding the way the risk of Modern Slavery can be addressed and reduced.

6. Managing supplier contracts

When a supplier is found to be in breach of the terms stipulated in their contract with us, we may suspend or terminate the contract with that supplier. We would take any breach involving a risk to human rights seriously and address it promptly with the ultimate outcome to reduce or remove the risk altogether.

The Objectives for 2022

The ELT has set out the below objectives that it intends to meet by the end of the 2022 financial year in addressing Modern Slavery risks.

Ameropa is committed to continued improvement and is taking the following actions to improve our own operations and supply chains.

1. Complete the supply chain risk mapping/ assessment

Ameropa, in collaboration with our consultancy, will conduct a deep dive assessment into supplier practices to identify the areas which have a high risk of Modern Slavery. The detailed analysis will assist us to further develop our Modern Slavery Statement in 2022, measure effectiveness and implement improvement initiatives. If a supplier is non-compliant with our Supplier Code of Conduct or does not present adequate measures to protect against Modern Slavery risks and/or demonstrates unwillingness to take appropriate action to remedy any non-compliance, we may cease our involvement that supplier and replace them with a supplier that presents a lower risk of Modern Slavery or otherwise meets our expectations around ethical behavior and human rights.

2. Continue training and awareness building

We will continue to develop a strong awareness of Modern Slavery risks and the importance of minimizing them across our organization.

3. Work towards a deep dive into the indirect supply chain

As Ameropa's response to Modern Slavery risks develops and matures, we are will endeavour to expand our focus to our indirect supply chain as soon as practicable.

4. Reporting concerns

To address individual concerns, we have a complaints and grievance procedure. This allows community members and other interested stakeholders, such as our suppliers, to raise issues directly with our local operations managers. We respond to all 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 undesirable practices.

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 acknowledges that it is accountable for addressing Modern Slavery issues in its operations and supply chain. The General Managers of each business unit are responsible for the management of Modern Slavery risk within their business unit. General Managers report back through to the ELT to assess the effectiveness of actions taken by the organisation.
2. **Supply chain mapping and risk assessment** has been initiated by members of the ELT and an initial assessment was conducted of the risks of Modern Slavery across Ameropa's operations. Building on this, the responses to our Questionnaire will enable us to identify areas of risk and enable us to consider improvements to our organisation's risk profile and identify areas of improvement and possibility of engagement with high-risk suppliers to minimise risks.
3. **Awareness:** Through our Modern Slavery policy, trainings, ongoing risk assessment, and other communications, we have established a strong awareness of Modern Slavery risks and the importance of minimizing them across our organization.
4. **A complaint and grievance policy** is available to address 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.
5. We are continuously improving the company's overall **risk assessment and mitigation process** which will encompass a response to the risks of Modern Slavery.

Consultation

There were consultations throughout the reporting period to assist in the drafting of this statement. Ameropa collaborated with personnel across the Company to discuss the activities within their operations and supply chain that are detailed throughout this statement. As Ameropa does not own or control any other entities, no other such parties were consulted.

This statement was approved by the Board of Ameropa.

Signed,



Jim Mole

Director, Ameropa Australia Pty Ltd