Dated 4 July 2025

MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDING IN MARCH 2025

Aditya Birla Global Trading (Australia) Pty Ltd

Reporting entity

This publication is the Modern Slavery Statement (**Statement**) of Aditya Birla Global Trading (Australia) Pty Ltd ACN 609 394 176 ('**ABGT Australia'**, 'we' or 'our') for the year ended in March 2025. This Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the Act).

Structure, operation and supply chains of ABGT Australia

Structure

ABGT Australia trades in Australia as 'ABG Trading'. Our registered office is located at 1198 Toorak Road, Camberwell, Victoria 3124. We have 4 employees.

We are the wholly-owned Australian subsidiary and business office for the Singapore incorporated Aditya Birla Global Trading (Singapore) Pte Ltd (ABGT Singapore), formerly known as Swiss Singapore Overseas Enterprises Pte Ltd.

Operations

ABGT Singapore is a leading bulk commodity trading solutions provider and logistics partner for its clients around the world. Through its subsidiaries, ABGT Singapore trades in over 20 countries.

As a subsidiary of ABGT Singapore, we undertake the following activities in Australia:

- import bulk fertilisers;
- lease warehouses;
- store bulk fertilisers in warehouses;
- organise the sale of bulk fertilisers to wholesalers;
- purchase beans, pulses and grains from Australian suppliers; and
- organise the export of beans, pulses and grains to ISC and SEA regions.

Supply chain

ABGT Australia's primary supplier for the product we trade in Australia is ABGT Singapore. From ABGT Singapore, we procure and import bulk fertilisers.

The source countries for the products that we procure from ABGT Singapore are: Oman, Indonesia, Brunei, Malyasia, China, Morocco, Vietnam, and other countries in the Middle East We also procure beans, pulses and grains from Australian suppliers.

Risk of modern slavery practice in operation and supply chains

We have assessed the risk of modern slavery practices in our Australian operations and in our supply chains.

Risk in operations

All of our employees are located in Australia and we comply with all Australian labour laws and employment related legislation.

We do not believe that there is any material risk of modern slavery practices in our operations.

Risk in supply chain

We procure all of our traded products from one supplier, ABGT Singapore. Currently, ABGT Singapore has no formal company policy (applying to ABGT Australia as its subsidiary as well) that deals with modern slavery avoidance.

While ABGT Singapore undertake a KYC due diligence process of its suppliers prior to procuring products from them, overall, we believe that there is a risk that modern slavery and **exploitative labour conditions can occur in ABGT Singapore's upstream supply chain and so** there is a material risk of modern slavery practice in our import supply chain. This is because:

- ABGT Singapore has no visibility of labour practices in its supply chain;
- ABGT Singapore does not have contract warranties/clauses that deal with modern slavery issues in agreement with its suppliers;
- ABGT Singapore is not aware whether its suppliers have modern slavery clauses in their contracts with their own suppliers; and
- it is unclear to what extent low skilled or foreign migrant workers are used in ABGT Singapore's supply chains;

Actions taken to address risks of modern slavery practice in our operation and supply chains

Assessing risk

In the reporting period for this Statement, we have attempted to assess the risk of modern slavery practices in our indirect supply chain by requesting ABGT Singapore to provide information on the practices undertaken by it to identify and deal with risks in its supply chain.

Beyond that, we are monitoring our operations and supply chains to identify any modern slavery practices.

Addressing risk

Currently, our 'Corporate Principles and Code of Conduct' describes our commitment to ethical and moral business practices, including creating a fair and equitable environment for all employees and, adopting practices that protect the health and safety of employees and the communities in which we operate.

With the assistance of external legal advice, we have attempted to further address the risks of modern slavery in our operations and supply chains by:

- 1. identifying our obligations under the Act and preparing this Statement;
- 2. **considering the adoption of a 'modern slavery clause' in contracts** with our suppliers, and contracts between ABGT Singapore and its suppliers;

- 3. identifying the failure in current company policies and procedures to deal with the risk of modern slavery practices; and
- 4. considering the adoption of a 'modern slavery policy' document to deal with the risk of modern slavery in the supply chain.

Assessing effectiveness of our actions

We recognise that assessing the effectiveness of our actions to address modern slavery risks in global operations and supply chains is essential. However, we do not yet have any formal processes to evaluate the effectiveness of our actions in dealing with or reducing the risk of modern slavery practices.

Our focus in this reporting period has been to gain a better awareness of the risk of modern slavery in our supply chain and to identify the actions required to be taken by ABGT Australia to deal with the risks.

Consultation

ABGT Australia does not own or control any other entity and so is not required to consult with any entity under section 16(1)(f) of the Act.

During the reporting period, the Directors of ABGT Australia have consulted internally regarding the Act, the reporting obligations, this Statement and future steps required to address modern slavery.

ABGT Singapore, as the ultimate holding company of ABGT Australia, is not a reporting entity for the purposes of this Act. Regardless, we have also consulted with ABGT Singapore regarding:

- 1. identifying the obligations under the Act;
- 2. considering the adoption of a modern slavery clause in contracts with our suppliers;
- 3. considering the adoption of a modern slavery policy document to deal with the risk of modern slavery in the supply chain.

Approval

This Statement is approved by the Board of Directors of ABGT Australia, in their capacity as the principle governing body of ABGT Australia, and signed on this day, fourth July 2025, on behalf of ABGT Australia by Surya Kant Jain, Chair and Shyam Zanwar, director of ABGT Australia.

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