

An aerial photograph of a sugarcane plantation. In the foreground, a river flows through lush green fields. In the middle ground, a large industrial processing mill is visible, with several tall chimneys emitting thick white plumes of smoke that rise into the sky. The background shows rolling green hills under a cloudy sky.

wilmar



Wilmar Australia Holdings Pty Limited

2022 MODERN SLAVERY STATEMENT

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ABOUT THIS STATEMENT

At Wilmar, we are guided by a set of values that define who we are and the way we work. We respect and strive to protect human rights and, to this end, are working to identify, manage and eliminate risks of modern slavery associated with our business activities and supply chains.

This joint Modern Slavery Statement covers Wilmar's sugar and renewable operations in Australia and New Zealand (**ANZ**), for the period 1 January to 31 December 2022 (**Statement**). It outlines our actions to assess and address modern slavery risks within our operations and the supply chains of our raw sugar, refined sugar, ingredients, renewable, bioethanol and agricultural services businesses.

This Statement has been prepared by Wilmar Australia Holdings Pty Limited (ACN 144 972 743) in its own capacity and on behalf of the entities it owns or controls that are reporting entities under the *Modern Slavery Act 2018* (Cth) (**Act**), as set out in **Appendix 1** (referred to together as **Wilmar, we, us** and **our** in this Statement). Internal stakeholders for all these entities were consulted and have provided input to the Statement.

This is our third Modern Slavery Statement, outlining the initiatives commenced and implemented in 2022 and areas of focus for 2023.

The Board of Wilmar Australia Holdings Pty Limited approved this Statement on behalf of all entities it owns or controls that are reporting entities under the Act on 30 June 2023.

A handwritten signature in black ink, reading "S. W. Rutherford".

Shayne Rutherford
Director, Wilmar Australia Holdings Pty Ltd

HIGHLIGHTS

SUMMARY OF KEY ACTIVITIES IN 2022

Since the establishment of the *Modern Slavery Act 2018*, Wilmar Australia Holdings Pty Ltd has built a sound framework to manage associated business risks. In 2022, we:

- Appointed Stoptline, an independent provider of whistleblower services, to facilitate reporting of any instances of modern slavery by internal or external stakeholders.
- Developed a Modern Slavery Awareness Program that included a training module designed to educate employees on modern slavery risks and Wilmar’s obligation.
- Reviewed and revised our Supplier Code which reinforces our expectations for suppliers regarding modern slavery and general social responsibility. The revised code was published on our website and shared with our suppliers.
- Integrated a modern slavery compliance screening process in our supplier onboarding process.
- Collaborated with internal and external experts and suppliers from the shipping and clothing industry to understand the modern slavery risks and management measures within those supply chains.
- Developed a circular to raise awareness of our expectations regarding modern slavery with our cane grower suppliers, and communicated this with grower collectives.
- Integrated management and coordination of our Modern Slavery Framework into our Group EHS and Sustainability function.
- Continued to engage with suppliers identified as having potential modern slavery risks based on their responses to our updated Corporate Social Responsibility Self-Assessment Questionnaire (SAQ).
- Continued to review and revise our SAQ and made appropriate changes to ensure its clarity and relevance.



1.1 | OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our structure

We are ANZ's largest manufacturer and marketer of raw and refined sugar products, a leader in renewable energy from biomass and a distributor of oleochemicals and other specialty products. We are also one of Australia's two major producers of bioethanol, and a leading supplier of molasses, sustainable fertiliser and stockfeed products.

We are owned by Wilmar International Limited¹, one of the world's leading integrated agribusinesses. We are committed to quality, sustainability and safety. Wilmar Australia Holdings Pty Ltd is the principal holding company for Wilmar's sugar and bioethanol operations in ANZ. **Appendix 1** outlines all entities required to report under the Act, and this statement covers the operations and supply chains of those entities listed in Appendix 1, plus those of the entities that they each own or control.

We have approximately 2,000 employees. We use our sugar industry expertise and resources to support research and innovation in cane growing, sugar milling and sugar refining, while also supporting local communities.

WILMAR SUGAR ANZ ACTIVITIES INVOLVE:



CANEGROWING

We have one of the largest and most advanced sugarcane farming operations in Australia, producing more than 500,000 tonnes of cane annually under audited best practice.



CANE TRANSPORT

We transport cane to our mills from receival points near supplying farms. This involves cane trains, cane bins and an extensive cane rail network, as well as associated scheduling of harvesting and haul out contractors engaged by growers.



SUGAR MILLING

We own and operate eight mills in North and Central Queensland, crushing about 15 million tonnes of sugarcane each year to make more than two million tonnes of raw sugar.



SUGAR EXPORTING

The majority of the raw sugar we produce at our Queensland mills is exported.



SUGAR REFINING

Sugar Australia and the New Zealand Sugar Company manufacture a range of food products, including bulk refined crystal and liquid sugar and packaged consumer products such as white, brown and caster sugars marketed under the CSR Sugar and Chelsea Sugar brands, respectively. We are the major supplier of food-grade sugar products to the Food & Beverage industry across both markets.

Wilmar holds 75% of the shares in Sugar Australia and New Zealand Sugar in joint venture with Mackay Sugar Limited.



RENEWABLE ENERGY

After crushing juice from sugarcane, the residual cane fibre (bagasse) is used as boiler fuel at our sugar mills. In a process called cogeneration, bagasse is burned at temperatures of more than 800°C to produce steam used for electricity generation or as heat in the milling process.



MOLASSES

On average, our sugar mills produce 500,000 tonnes of molasses a year. Approximately half of this is fermented in our Sarina Distillery to produce ethanol; the remainder is sold as feed to domestic and export livestock industries.



BIOETHANOL

Wilmar BioEthanol produces a range of products, including pure and methylated ethanol, ethanol for fuel, industrial solvents and chemicals, and refrigeration brine.



AGRICULTURAL SERVICES

Co-products of the ethanol distilling process at Sarina are used to produce liquid fertiliser and stockfeed in the Australian market.



INGREDIENTS

Wilmar Ingredients supplies a comprehensive range of products, including non-sugar sweeteners and sugar polyols made from natural products, glucose, glycerine, esters, fatty acids, oleochemicals and natural vitamin E.



PRICING AND MARKETING

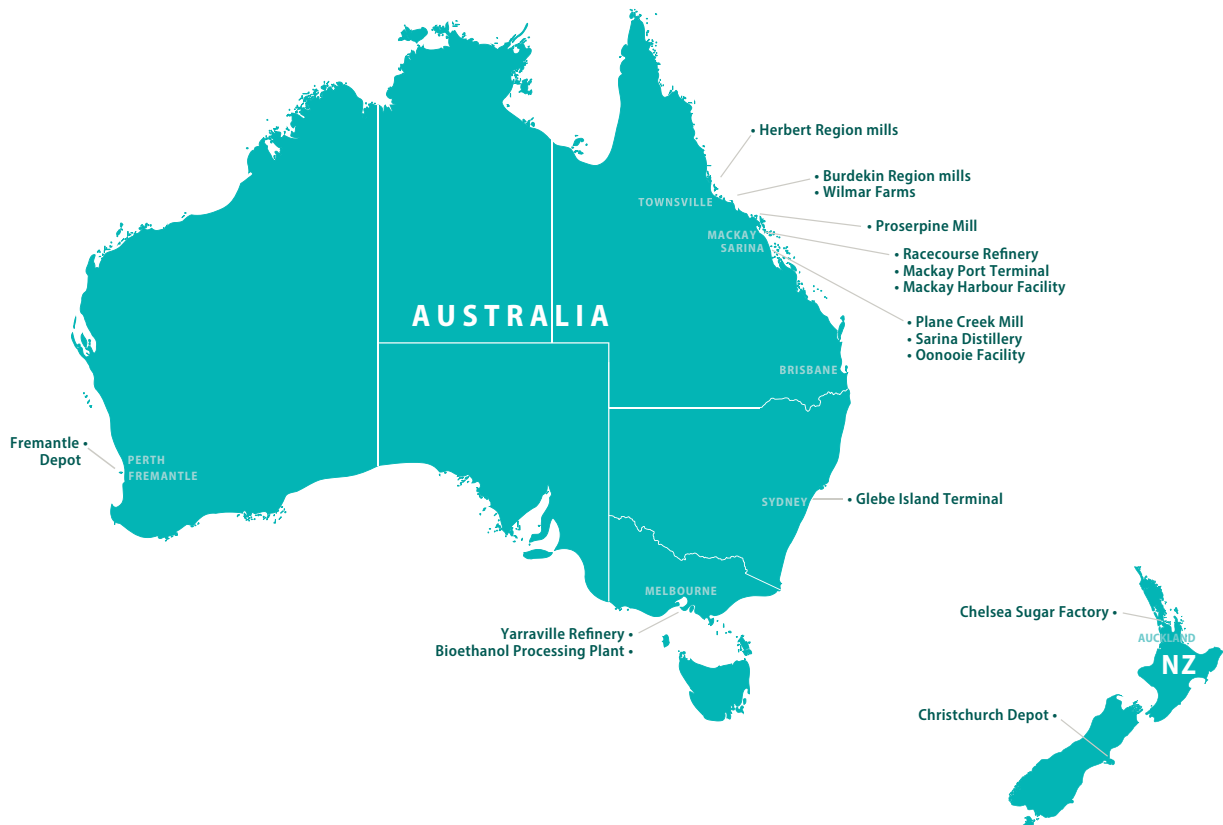
We offer raw sugar marketing, sales, and pricing services for our cane grower suppliers.

¹ www.wilmar-international.com/about-us

Our brands



Our Australian and New Zealand operations



Our supply chain

>2,700
suppliers of goods and service

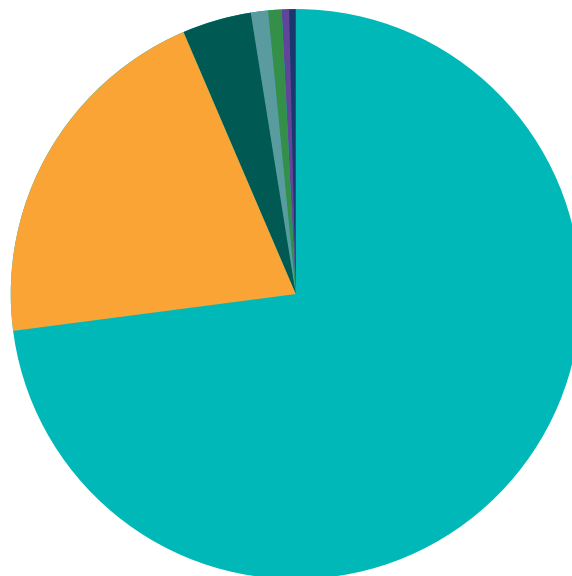
>1,400
Queensland sugarcane growers

Top countries of supply by spend

NEW ZEALAND
Product additives, utilities
and packaging

SINGAPORE
Raw sugar, shipping
services and ethanol

AUSTRALIA
Raw sugar, transport and
material handling, and
industrial products and
materials



MALAYSIA
Manufacturing chemicals

GREAT BRITAIN
Financial services

CHINA
Production additives

JAPAN
Sea freight



1.2 | MODERN SLAVERY FRAMEWORK – POLICIES AND GOVERNANCE

Our operations adhere to a framework of modern slavery policies and governance.

The table (next page) highlights the policies that assist us in identifying and managing modern slavery within our operation.

The Policy, Standard and Supplier Code were developed with reference to Wilmar International’s relevant policies.

Wilmar International has Supplier Guidelines that require suppliers to comply with applicable international, national, and local laws and freedoms.² Among other things, the guidelines provide that suppliers cannot engage child labour, must respect freedom of association of employees and ensure ethical recruitment.

Wilmar International’s Human Rights Policy outlines the commitment to provide safe, clean and healthy workplace living environments while striving to respect human rights.³

Our framework



1. Manage

Policies, procedures, contracts

2. Identify

Supply Chain Review and Corporate Social Responsibility Self-Assessment Questionnaire (SAQ)

3. Mitigate

Reporting mechanisms both internal and external, correction action plans

4. Collaborate

Communication, training, engagement with business units

5. Evaluate

Assessment and review

² https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/resource/wilmar-supplier-guidelines.pdf?sfvrsn=322d5b97_2

³ https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/human-rights-policyed16f04afc7043738e7579b103a3a15e.pdf?sfvrsn=9378b7f5_2

Policies, procedures, codes

<p>Modern Slavery Policy (Policy)</p>	<p>This Policy is a statement of our commitment to identify and mitigate risks of modern slavery.⁴</p> <p>Our standards and procedures, which apply to both our company and suppliers, are based on this policy.</p>
<p>Supplier Code</p>	<p>Our Supplier Code outlines Wilmar’s expectations for suppliers regarding modern slavery and general social responsibility. Wilmar reserves the right to disengage from any supplier based on their performance against this code. The Supplier Code demonstrates our commitment to purchasing goods and services that are produced in a socially responsible and environmentally sustainable manner.⁵</p> <p>In 2022, the Supplier Code was reviewed and revised to include provisions on conflict of interest, bribery, corruption, and gifts. The revised Supplier Code was published on our website.</p>
<p>Whistleblower Standard</p>	<p>At Wilmar, we believe in fostering a culture of transparency and integrity in all our business dealings. Our Whistleblower Standard encourages employees, contractors, and other stakeholders to speak up and report any genuine concerns they may have regarding potential, suspected, or actual misconduct. This standard aims to create a safe and supportive environment for those who choose to raise concerns, so that we can take prompt and appropriate action to address any issues that may arise.</p> <p>This Whistleblower Standard was developed and delivered in 2022.</p>

Governance

The **Board of Wilmar Australia Holdings Pty Ltd**, the principal Australian holding company that owns or controls the reporting entities outlined in Appendix 1, is responsible for approving the Modern Slavery Statement in its own capacity and on behalf of the reporting entities.

Wilmar’s ANZ senior leadership team is responsible for the Modern Slavery Policy and monitoring the implementation of the Modern Slavery Framework.

A **Modern Slavery Steering Committee** comprising representatives from various business units and corporate support functions including Environment, Health & Safety, Sustainability, Corporate Relations, Legal and Procurement is responsible for the implementation of the Modern Slavery Framework, associated procedures, risk assessment criteria, as well as staff training. This committee is also responsible for consultation with the business units regarding the Statement and Modern Slavery Framework.

A **Modern Slavery Statement Steering Committee** was established to oversee the development, approval and finalisation of the Statement, and includes representatives from the Legal, Environment Health & Safety and Sustainability, Procurement and Corporate Relations functions.

All **employees** have responsibility for identifying and reporting modern slavery risks under our Standard.

In 2023, we plan to conduct a review of our Modern Slavery Policy to ensure it is up to date and addresses emerging modern slavery risks.

⁴ <https://www.wilmarsugar-anz.com/publications/738-modern-slavery-policy/file>

⁵ *Wilmar Supplier Code* <https://www.wilmarsugar-anz.com/supply-to-wilmar>

1.3 | IDENTIFYING MODERN SLAVERY RISKS

Modern slavery risks

We consider the risk of modern slavery to be low for our own operations in ANZ because of the legislative regimes under which we operate, and the policies and management processes we have in place for our workers and contractors. These systems include:

- our codes of conduct outlining acceptable workplace behaviours
- review of visa conditions and working rights before employment
- grievance mechanisms and support systems designed to assist workers
- clear and independently audited payment systems.

In identifying the high-risk categories within our supply chain, we have used independent and external guidance to ensure a comprehensive understanding of the potential risks. This guidance has been used to inform our approach to address modern slavery risks and to focus our efforts on the areas that require the most attention.

Based on the analysis of our supply chain, we have identified that modern slavery risks exist in our raw sugar imports and shipping services. Our findings also suggested that goods or services which require low-skilled or seasonal labour present a higher risk for modern slavery. Within our supply chain, this may include agriculture, cleaning, security services, and apparel and personal protective equipment.

Additionally, we have identified IT products (e.g. laptops, computers, and mobile phones) as posing high risk for modern slavery based on The Walk Free Foundation’s list of top five products imported into Australia from countries with a potential for modern slavery in production⁶.

In 2022, we collaborated with both internal and external parties to gain a comprehensive understanding of the modern slavery risks present in the clothing and shipping industries. This engagement allowed us to gain valuable insights into how these risks are managed and identify any potential areas for improvement.

The following provides an overview of the stakeholder engagement conducted and its outcomes:



⁶ <https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>

Understanding modern slavery risks in the apparel industry

The clothing industry has been identified as a high-risk sector for modern slavery. The global nature of the clothing industry and the complex supply chains make it difficult to monitor and address instances of modern slavery. The fast-paced nature of the industry and the pressure to produce quickly and cheaply increases the risk of workers being exploited. It is important for companies to engage with stakeholders to understand the risks and work towards their mitigation.⁷

In 2022, we invited our uniforms and apparel supplier, to participate in a Modern Slavery Steering Committee meeting. The purpose of this meeting was to discuss how they mitigate modern slavery risks within their supply chain and to ensure that Wilmar is sourcing its products from a responsible and ethical company.

Our supplier has demonstrated a proactive and positive commitment to combating modern slavery by implementing various initiatives and procedures within its business operations.⁸ This includes conducting risk assessments in its supply chain, promoting ethical sourcing and labor practices, and providing training and resources to employees on the issue of modern slavery. They also requires suppliers to adhere to the guidelines outlined in its Supplier Code of Conduct, which prohibits the use of forced labor and ensures fair working conditions.

Our uniform and apparel supplier's efforts align with our goal of promoting ethical and responsible business practices in all areas of our supply chain.

Understanding modern slavery risks in the shipping industry

The shipping industry faces modern slavery risks due to factors such as a high proportion of migrant workers and the use of selectively nominated flag states for vessel registration which creates a fragmented system of regulatory oversight and isolated working conditions. The industry's global and complex supply chains, low wages, and limited access to labour protections make workers vulnerable to exploitation.⁹

In an effort to identify areas for improvement in our supply chain, we invited our logistics managers to a Modern Slavery Steering Committee meeting. The aim was to get his insights to better understand the shipping industry and Wilmar's engagement within it.

Through this session, we learned that the shipping industry is complex, with various intermediaries and shipping agents. For vessels operating within Australian waters, there are Australian legal obligations on operators which minimise the risk of worker exploitation. For international services, Wilmar contracts either through Wilmar owned Raffles Shipping or other reputable large, global shipping companies.

We have ensured that all shipping operators have completed our SAQ and been assessed as low risk. Longer term, Wilmar identified the potential to explore tools such as independent, specialist third party shipping risk management platforms to provide greater confidence in this area.

⁷ <https://www.walkfree.org/reports/beyond-compliance-in-the-garment-industry/>

⁸ <https://www.bisleyworkwear.com.au/sustainability/>

⁹ UN Global Compact Network Australia (2022) *Modern Slavery within Maritime Shipping Supply Chains*. Available at: <https://unglobalcompact.org.au/wp-content/uploads/2022/12/Modern-Slavery-within-Maritime-Shipping-Supply-Chains.pdf>.

Corporate Social Responsibility Self-Assessment Questionnaire (SAQ)

The SAQ responses from suppliers in both the reporting year and the previous year indicated that 56% were compliant, 32% required review, and 12% were at risk of modern slavery. In 2022, we conducted a comprehensive review of suppliers with potential modern slavery risks, which included direct communication to gather more information and documentation. After reviewing the information shared by suppliers and clarifying their responses to the SAQ, suppliers previously flagged as risk or review were reclassified as compliant. Section 1.4 (Approach to Remediation) provides further details on our approach used when a supplier is assessed as potentially posing a higher level of modern slavery risk.

Through direct communication with suppliers requiring additional due diligence, it became apparent that many businesses lacked comprehension of the questions asked in the SAQ. In 2022, we evaluated our SAQ to ensure that the questions are clear and pertinent, and the questionnaire effectively captures modern slavery risks in our supply chain. The assessment was informed by the supplier questionnaires available on the Australian Government's modern slavery procurement toolkit and The Walk Free Foundation.

As a result of this evaluation, we refined the questions in the SAQ to make them more clear and concise and better reflect the measures suppliers have in place to manage modern slavery risks.

Moving forward, the revised SAQ will be provided to new vendors to ensure that our supplier risk assessment process is up to date and robust.

Updating the supplier on-boarding process

Wilmar has an approval process as part of its new supplier onboarding to ensure that any potential new supplier meets our minimum requirements prior to approving them to trade with us.

In 2022, we introduced a modern slavery compliance screening step into the vendor approval process for the raw sugar and renewables part of our business. This required potential suppliers to complete our SAQ and having a member of our Modern Slavery Steering Committee review their responses. Based on the review, only suppliers that are deemed compliant continue with the onboarding and setup process; all others will follow the due diligence process, as outlined in section 1.4 Approach to Remediation.



Whistleblower Program

In 2022, we developed and implemented a comprehensive Whistleblower Program that is applicable across Wilmar's ANZ business operations.

Under this program, we streamlined and strengthened our grievance reporting mechanisms by revising and integrating our previous Whistleblower Policy and Procedure into a comprehensive and accessible Whistleblower Standard. This new standard offers multiple reporting avenues for individuals to raise concerns, both internally and externally, with the option to do so confidentially and anonymously.

We have taken a proactive step in promoting transparency and ethical practices in our business by partnering with Stopline Pty Ltd (Stopline), a reputable, independent whistleblower service provider. In collaboration with Stopline we have established a secure and confidential communication channel for our stakeholders to raise concerns and compliance matters with ease.

Stopline is accessible to all relevant stakeholders who may be affected, including:

- a current or former employee or officer of Wilmar
- an individual who supplies goods or services to Wilmar (whether paid or unpaid)
- an employee of a company that supplies goods or services to Wilmar (whether paid or unpaid)
- other external parties, including customers, suppliers and contractors and any stakeholder who has a current or previous business relationship with Wilmar.

Integration with Group EHS and Sustainability function

In order to ensure the successful implementation of the Modern Slavery Framework across the wider ANZ business, Wilmar incorporated management and coordination of our Modern Slavery Framework and associated processes into our Group EHS and Sustainability function in 2022.

In 2023, we will continue to focus on high-risk sectors within our supply chain, which includes agriculture and cleaning services. In addition, we will focus on IT products such as laptops, computers, and mobile phones, as they are among the products most susceptible to modern slavery according to the Walk Free Foundation's Global Slavery Index.

Our aim is to build on the progress we have made in 2022 by engaging with stakeholders in these high-risk areas, in order to effectively understand and manage any potential modern slavery risks.

Furthermore, we will reinforce our efforts to combat modern slavery by integrating a modern slavery compliance screening process into the vendor onboarding process across all business units within Wilmar. This process will aid in identifying and mitigating modern slavery risks associated with our suppliers.



1.4 | APPROACH TO REMEDIATION

We recognise that effective due diligence may include regular assessment (including supplier questionnaires) site visits, or review of concerns raised through our grievance reporting mechanisms. Our Framework uses a range of tools to ensure we are mitigating modern slavery risks and providing remedies wherever necessary and possible.

Where a supplier is assessed as potentially posing a level of modern slavery risk at the higher end of our scale, we may initiate an action plan that includes one or more of the following:

1. assessment of human rights risks relevant to the grievance or issue raised
2. root cause analysis specific to the grievance or identified issue, carried out in consultation with affected parties or their chosen representatives
3. corrective actions to address non-compliance
4. remediation action, developed in consultation with the affected parties or their chosen representatives
5. systemic changes required of the supplier (e.g. new systems, training, new expertise) to address the root causes
6. progress indicators and monitoring activities agreed between the parties
7. commitment to regular communication and dialogue on progress against the action plan
8. refusal to engage further with the supplier.

While we have directly communicated with those suppliers that originally triggered the risk or review categories in the completed SAQs, we have not yet found it necessary to implement any of the mitigation measures listed above with an existing supplier.

In accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs), we recognise our responsibility to cooperate in the remediation of situations where we have caused or contributed to modern slavery and our responsibility to use our leverage where possible to encourage suppliers to assess and address modern slavery risks in their operations and supply chains.

1.5 | TRAINING AND CAPACITY BUILDING

In line with our Modern Slavery Policy and Supplier Code, we strive to ensure that both our employees and suppliers are fully aware of our expectations.

We recognise the importance of not only implementing and enforcing effective systems and controls to prevent modern slavery in our supply chains, but also ensuring that it does not occur within our own business operations.

To achieve this, it is important that all our employees are equipped with the knowledge and skills to identify modern slavery.



Modern Slavery Awareness Program

In 2022, we developed a Modern Slavery Awareness Program to raise awareness and understanding of modern slavery risks, while emphasising the collective responsibility for reporting instances or concerns of modern slavery.

Whistleblower training

As part of our Whistleblower Program, we developed a training module to ensure our employees are equipped with knowledge of the program. This module aims to educate our employees on the program's purpose, procedures and the significance of their role in reporting any instances of modern slavery.

Grower circular

In 2022, Wilmar developed a modern slavery circular to communicate our obligations under Australia's Modern Slavery Act 2018 to our cane grower suppliers, and our expectations of businesses that supply goods and services to Wilmar.

This circular aims to raise awareness, and emphasise the importance, of mitigating modern slavery risks in the supply chain. We believe that engagement and education of suppliers is crucial in mitigating modern slavery risks.

The circular and Supplier Code were shared with grower collectives that represent our cane grower suppliers in 2022. They were also published on our grower website.

In 2023, we will continue our commitment to promoting ethical business practices by delivering the Modern Slavery Awareness Program and Whistleblower training module to all employees through the following channels:

- an online training module to ensure employees have a clear understanding of modern slavery risks and their role in identifying and reporting any instances of modern slavery
- toolbox talks to supplement the online training, providing an opportunity for managers and supervisors to engage with employees and discuss the importance of both the programs
- electronic screens displayed in ANZ offices and worksites to raise awareness of our commitment to preventing modern slavery in our business and supply chains.

We recognise the importance of engaging with our suppliers, including the 1,400 cane growers who supply to Wilmar's eight sugar mills. In 2023, we plan to share the modern slavery circular and Supplier Code directly with our cane grower suppliers. We will also initiate discussions to understand their perspectives on modern slavery, and any potential challenges they may face in their businesses and supply chains.



1.6 | ASSESSMENT AND EFFECTIVENESS

We are committed to promoting and fostering a culture of continuous improvement with our employees, contractors and suppliers to identify and address modern slavery risks. We use metrics in assessing the effectiveness of our actions and to refine our approach where necessary. Refer to the table below:

Category	Metrics	Outcome
Manage	<ul style="list-style-type: none"> • Completion of a review of the Modern Slavery Framework and associated processes 	<ul style="list-style-type: none"> • Modern Slavery Framework and associated processes were reviewed to ensure their relevance and effectiveness. • Precedent contracts were reviewed and updated to include modern slavery clause and reference to compliance with the Wilmar Supplier Code.
Identify	<ul style="list-style-type: none"> • Supply chain risk assessment • Outcome of due diligence over SAQ responses 	<ul style="list-style-type: none"> • Reviewed supplier selection process criteria to ensure it is effective in identifying the risk of modern slavery in our supply chains. • All SAQ responses were reviewed. After direct communication and clarification, suppliers were found to be compliant.
Mitigate	<ul style="list-style-type: none"> • Number of complaints or issues raised via the confidential communication channel • Number of corrective action plans developed in conjunction with suppliers 	<ul style="list-style-type: none"> • No complaints or issues related to modern slavery were raised during the reporting period.
Collaborate	<ul style="list-style-type: none"> • Modern Slavery Committees meet regularly to ensure collaboration across the ANZ Group • Number and quality of training programs or information sessions delivered to employees 	<ul style="list-style-type: none"> • Monthly meetings held with Modern Slavery Steering Committee. • Developed and implemented training materials for employees on modern slavery risks as well as compliance with Wilmar codes and policies.
Evaluate	<ul style="list-style-type: none"> • Assessment and review of our effectiveness 	<ul style="list-style-type: none"> • Continuous monitoring and evaluation of our metrics to ensure they remain relevant and effective in measuring our progress in addressing and managing modern slavery risks.

In 2023, we intend to take a proactive approach to addressing the risks and exposures related to modern slavery in our supply chains by reviewing third-party risk management platforms as part of our comprehensive due diligence process.

1.7 | CONSULTATION

Wilmar has taken a collaborative approach to implementing policies and processes to address modern slavery risks in its supply chains. This approach involved cross-functional groups, represented by our reporting entities.

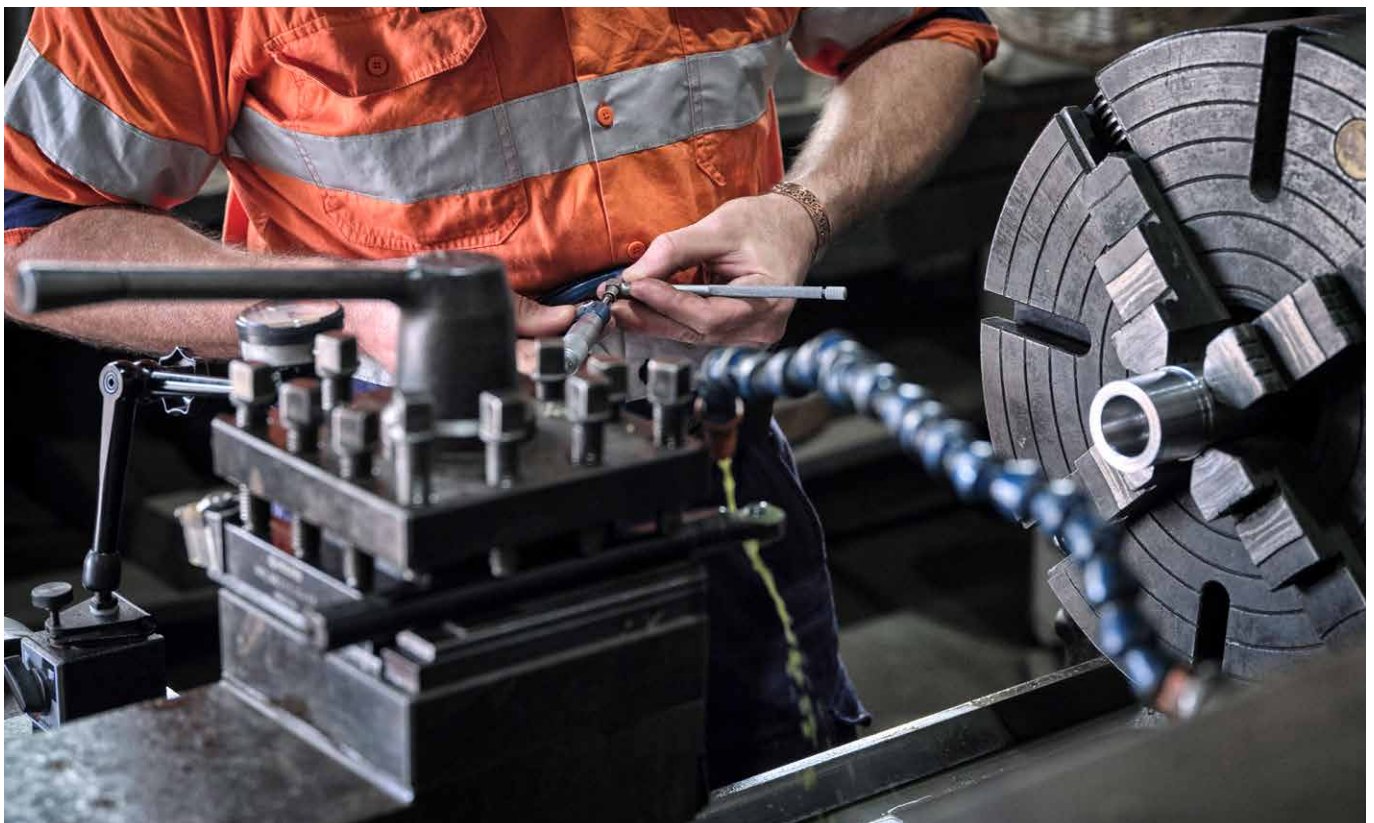
Our Modern Slavery Steering Committee comprises representatives of Wilmar’s business units and corporate support functions. This committee plays a critical role in driving the implementation of the Modern Slavery Framework within their areas of responsibility, as well as communicating modern slavery initiatives to employees across Wilmar and to our suppliers.

Wilmar also consulted with subject matter experts outside this committee to better understand risks within specific industries. In 2022, Wilmar consulted internally and externally on risks in the shipping and clothing industries.

Owned and controlled entities that are not reporting entities under the Act are engaged by the Modern Slavery Steering Committee on the issue generally and included in the implementation of the Framework and development of the Statement.

The development of this statement was led by the Group Environment & Sustainability Team in collaboration with the Modern Slavery Steering Committee. This statement was reviewed and finalised by the Modern Slavery Statement Steering Committee before being presented to the Wilmar Australia Holdings Pty Ltd Board for approval.

Additionally, Wilmar International, as the parent company of Wilmar, is kept abreast of modern slavery initiatives and receives a copy of the Statement. This systematic approach to managing modern slavery risks highlights our commitment to continuous improvement and responsible business practices.



APPENDIX 1 | REPORTING ENTITIES

This Modern Slavery Statement is prepared by Wilmar Australia Holdings Pty Limited (ACN 144 972 743) in its own capacity and on behalf of all of the following entities it owns or controls that are reporting entities under the Act:

Entity	Primary activity	Directly owns or controls
Wilmar Sugar Pty Ltd (ACN 081 051 792)	Main operating entity of the raw sugar and renewables businesses in Australia which includes cane farming, raw sugar production and electricity generation. It also employs all workers in Wilmar's Australian operations	
Wilmar Sugar Australia Trading Pty Ltd (ACN 613 299 362)	Carries out raw sugar marketing, sales, pricing and marketing services for cane grower suppliers and holds storage and handling contracts with the owner of the sugar terminals	
Wilmar BioEthanol (Australia) Pty Ltd (ACN 009 660 191)	This entity is responsible for the production, marketing and sale of ethanol in Australia and for the associated fertiliser and stockfeed AgServices business	
Wilmar Sugar Refining Investments Pty Ltd (ACN 054 982 071)	Participant (75%) in the Sugar Australia Joint Venture and owns 75% of the shares in Sugar Australia Pty Ltd, the manager of the joint venture. Sugar Australia operates the Australian sugar refining activities of the business	Sugar Australia Pty Ltd
Wilmar Australia Pty Limited (ACN 144 973 115)	Holding company	Wilmar Sugar Australia Limited
Wilmar Sugar Australia Limited (ACN 098 999 985)	Holding company	Wilmar Sugar Australia Holdings Pty Ltd
Wilmar Sugar Australia Holdings Pty Ltd (ACN 141 216 051)	Holding company	Wilmar Sugar Pty Ltd Wilmar Sugar Refining Investments Pty Ltd Wilmar Sugar Australia Trading Pty Ltd Wilmar Sugar Australia Investments Pty Ltd Wilmar Ethanol (Australia) Pty Ltd Wilmar Ingredients (Australia) Pty Ltd
Wilmar Sugar Australia Investments Pty Ltd (ACN 099 000 450)	Holding company that owns 75% of shares in New Zealand Sugar Company Ltd and owns a minority interest in in Sugar Terminals Limited	New Zealand Sugar Company Ltd Various mill owning subsidiaries and holding companies
Wilmar Ethanol (Australia) Pty Ltd (ACN 099 000 012)	Holding company of the entity that operates the BioEthanol business in Australia	Wilmar BioEthanol (Australia) Pty Ltd

APPENDIX 2 | ADDRESSING THE MODERN SLAVERY ACT'S MANDATORY REPORTING CRITERIA

This statement was prepared to meet **Wilmar's** reporting requirements. The table below sets out how this Statement addresses the mandatory reporting criteria as required under the Modern Slavery Act 2018.

Mandatory criteria	Reference in this Statement
1. Identify the reporting entity.	About this Statement Appendix 1
2. Describe the reporting entity's structure, operations and supply chains.	Section 1.1 Our structure, operations and supply chain
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Section 1.3 Identifying modern slavery risks
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Section 1.2 Modern Slavery Framework - Policies and Governance Section 1.3 Identifying modern slavery risks Section 1.4 Approach to remediation Section 1.5 Training and capacity building
5. Describe how the reporting entity assesses the effectiveness of these actions.	Section 1.6 Assessment and effectiveness
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	Section 1.2 Modern Slavery Framework - Policies and Governance Section 1.7 Consultation