

# Bundaberg Sugar Group

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S L A V E R Y S T A T E M E N T



**BUNDABERG**  
SUGAR



# About Us

This Statement covers the activities of Bundaberg Sugar Group Ltd ACN 009 658 164 (BSG) and its subsidiaries for the reporting period from 1 April 2023 to 31 March 2024. It outlines BSG's commitment to mitigating modern slavery risks within our operations and supply chains in line with the Australian Government's Modern Slavery Act 2018.





# Our Business

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Having origins commencing back in 1880, BSG has since established itself as a leader in the Australian Sugar Industry. We are committed to ethical business practices and upholding human rights across our operations. Our activities include sugarcane growing, milling, refining, and marketing. In the last season, our Queensland sugar mill processed just under 1 million tonnes of sugar cane, producing more than 139,000 tonnes of sugar, 100% of which was refined for domestic consumption. Additionally, our operations include Bundaberg Walkers Engineering Ltd, which manufactures and supplies both domestic and international markets with large scale machinery and expertise. Our holdings also include, Bundaberg Molasses, which is a plant based in Oakey, western Queensland, producing liquid feed for animals since 1994.

We employ approximately 350 personnel across our operations, including those working on our cane farms and refinery. During the reporting period, we employed workers through the Pacific Australia Labour Mobility (PALM) Scheme, who contributed to both our farming and refining operations.



# Our Modern Slavery Risks



According to the 2023 Global Slavery Index for Australia, the agricultural sector remains a high-risk area for modern slavery, particularly among migrant workers. BSG recognises the vulnerability of these workers, especially those engaged through labour mobility schemes. In response, BSG has taken steps to ensure that all workers, including those under the PALM Scheme, are treated fairly and are provided with safe working conditions, fair wages, and access to grievance mechanisms.

## Actions Taken to Assess and Address Risks

**Within Our Operations:** As an approved employer under the PALM Scheme, BSG conducts monthly audits to ensure compliance with Scheme obligations. These audits verify:

- Accurate wage deductions in line with Scheme guidelines
- Consistent adherence to minimum net pay guarantees
- Provision of the minimum guaranteed hours of work per week
- Minimum standard for supplied accommodation

In addition, BSG has implemented a welfare and wellbeing plan tailored for our PALM Scheme workers. This includes regular reviews of their accommodation, transport, and ongoing support from a dedicated Wellbeing Officer who meets with workers regularly to address any concerns.





## Actions Taken to Assess and Address Risks



### Within Our Supply Chains

BSG addresses modern slavery risks within our supply chains through a stringent supplier declaration process. Labour hire suppliers are required to complete a comprehensive questionnaire upon engagement and every two years thereafter. This questionnaire covers employment conditions, ethical practices, accommodation provisions, and worker representation.

Before approval, BSG reviews each supplier's practices to identify any potential risks of modern slavery. This ongoing vigilance ensures our supply chains remain free from exploitative practices.

## Assessing the Effectiveness of Actions

BSG is committed to monitoring and improving the effectiveness of our modern slavery initiatives. We conduct regular gap analyses to ensure compliance with relevant legislation and update our policies as needed. External audits, including those conducted under the Bonsucro standard, validate the effectiveness of our actions.

During the reporting period, a PALM scheme assurance visit by the Department of Employment and Workplace Relations (DEWR) was held. The assurance visit provided an opportunity for departmental representatives to meet and discuss BSGs understanding of, and compliance with, the new obligations under the updated PALM Scheme Deed (Deed) and Guidelines.

On reviewing the outcomes of the assurance visit, including on-site observations, documents and information, the department was satisfied that BSG has taken adequate steps to understand and comply with our obligations under the Deed and Guidelines.

To further assess our effectiveness, BSG conducts random worker interviews, implements grievance management procedures, and periodically reviews supplier labour invoices against worker timesheets.

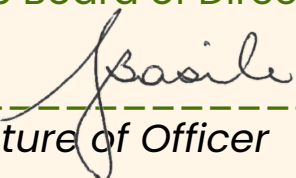


# Consultation with Other Entities Owned by BSG

This Statement is submitted on behalf of the Bundaberg Sugar Group, with consultation taking place through discussions at the Bundaberg Sugar Group Board meetings.

This Statement was approved by the Board on behalf of each of the reporting entities on 18 September 2024 and is correct as of that date.

Signed on behalf of the Bundaberg Sugar Group Board of Directors,

  
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*Signature of Officer*

Gaetano Basile  
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*Name of Officer*

Director  
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*Position*

