

# Warakirri 2 Pty Ltd

(Warakirri Cropping)

## *Modern Slavery Statement*

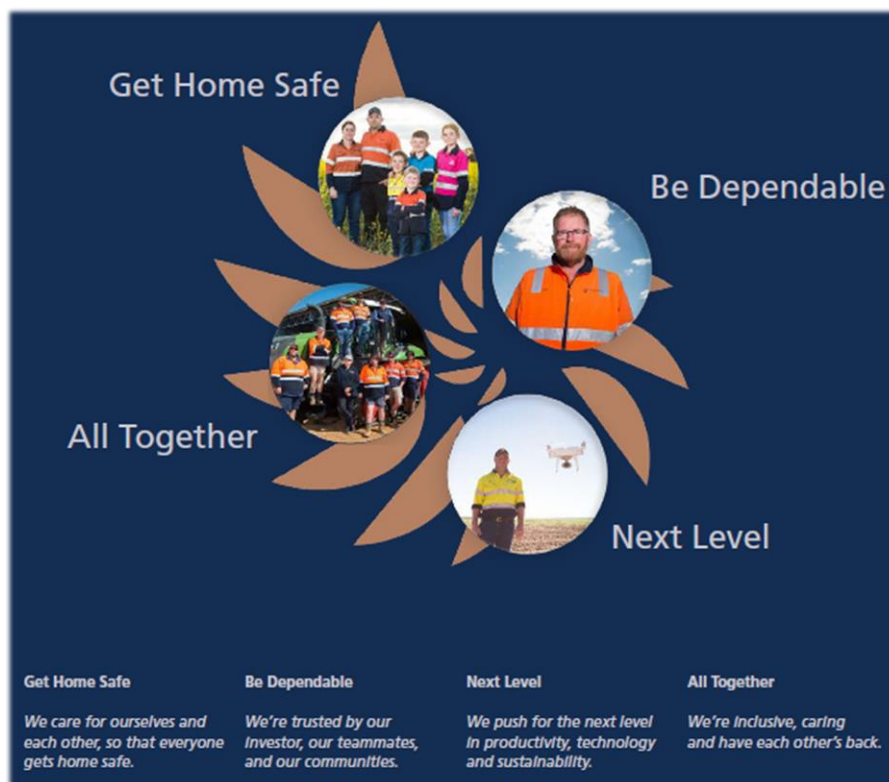
December 2023



## 1. Introduction

This statement is made by Warakirri 2 Pty Ltd ACN 064 530 454 (Warakirri Cropping) in accordance with section 14 of the Modern Slavery Act 2018.

Warakirri Cropping conducts its business in a way that is open and accountable to its stakeholders. Our corporate governance and business practices are rigorous and adopt a standard of continually maintaining and adhering to the highest levels of honesty, integrity and ethical standards. At the heart of our company values we believe in equity, fairness and respect for all individuals including the rights of our people, customers, suppliers and contractors to be free from practices of modern slavery.



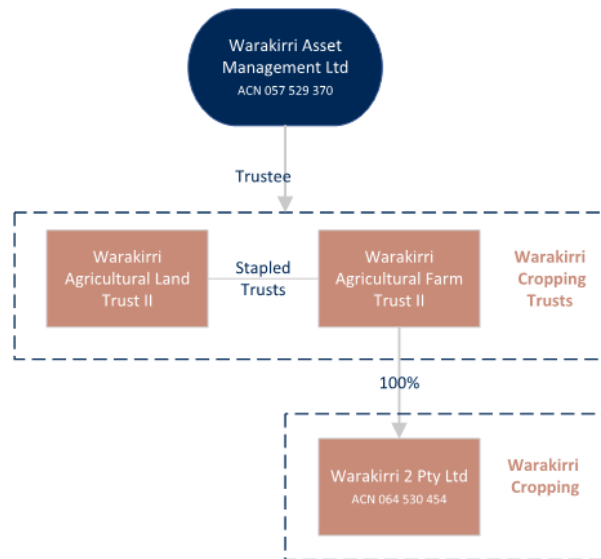
Warakirri Cropping is committed to complying with the labour rights standards, legislation and statutory requirements and provides this Modern Slavery Statement covering the period 1 July 2022 to 30 June 2023 and describes the actions taken to address modern slavery risk in its operations and supply chain for this period.



## 2. About Us and Our Structure

Warakirri Cropping is an Australian business that was established in 1996 and has a proud history as one of the largest, most diverse, and progressive broadacre cropping businesses in Australia. The business operates eleven geographically diverse, investment grade, broadacre cropping properties across the three main production regions of Australia.

Warakirri Cropping is a wholly owned entity of Warakirri Agricultural Farm Trust II, a unit trust that is stapled to Warakirri Agricultural Land Trust II (collectively known as “Warakirri Cropping Trusts”) and beneficially owned by an Australian superannuation fund, which owns the equipment, infrastructure and land on which Warakirri Cropping conducts its operations. Warakirri Asset Management Limited is the trustee and manager of the Warakirri Cropping Trusts and provides corporate services and governance oversight of the Warakirri Cropping’s operations.



## 3. Our Operations, Supply Chains and Associated Risks

Warakirri Cropping operates a diversified portfolio of broadacre properties across eleven large-scale properties located in the New South Wales, Victoria, Western Australia and Queensland.

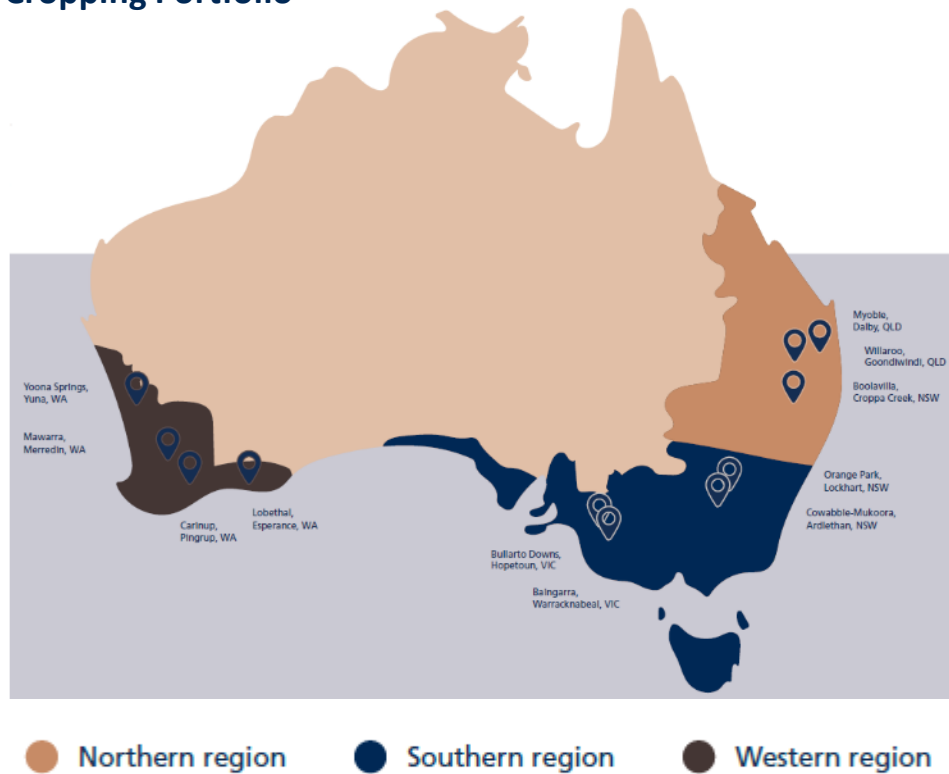
For the reporting period ending 30 June 2023, Warakirri Cropping’s portfolio consisted of ~164,000 hectares of farmland, producing ~410,000t of crops.

Warakirri Cropping categorises its business operation and supply chain into three main areas, as follows:

- **Operational Implementation:** farming employees, consultants and contractors used across the portfolio to execute farming activities.
- **Farming Supplies:** the products that we source and use including seed, fertiliser, agricultural chemicals, machinery and PPE. This category also covers the uniform and personal protective equipment used in our operations.
- **Product Marketing:** including storage, transportation, and end customers of our product.

Consistent with the previous reporting period, in FY 2023 an assessment of modern slavery risk was completed across the above categories to consider whether Warakirri Cropping is causing, contributing, or directly linked to modern slavery practices.

## Warakirri Cropping Portfolio



In FY2023 we continued to assess our operation and supply chain categories, against the below identified risks:

- Sector and Industry risks (**low** to **medium** risk)
- Products and services risks (**low** to **medium** risk)
- Geographic risks (**low** to **medium** risk)

### Operational Implementation

Warakirri Cropping farming operations is supported by approximately 150 employees and a network of advisors, consultants and contractors. In FY 2023, our farming operations consist of 96 full-time, part-time and 55 casual workforce who are either Australian or hold working rights in Australia.

We have identified the following modern slavery risk factors throughout our Operational Implementation:

- **Sector and Industry risks – low risk**
  - Whilst our operations are solely located in Australia, our workforce does consist of temporary, seasonal or foreign labour who may be unaware of their rights.
  - At certain peak periods e.g., during harvest, we use casual labour.
- **Products and Services risks – low risk**
  - Some of our delivery timeframes during peak harvest periods may require employees and service providers to engage in overtime work.
- **Geographic risks – low risk**
  - We operate in remote locations which necessitate some of our employees to live at residences owned and controlled by us.

We have assessed the risk of modern slavery in our **Operational Implementation** category to be **low**. This assessment is based on the controls we have in place to counter the above identified risk factors including, but not limited to:

- All employees have entered into an employment agreement directly with our business and have access to company policies which outline their employment rights and entitlements.
- Annual remuneration is paid in accordance with the National Employment Standards (NES) or the relevant award applicable to the employee's role.
- Casual employees are remunerated at or above minimum award classification plus casual loading.
- Accrued time-off in lieu (TOIL) allowance for periods that may require employees to engage in overtime work.
- Superannuation contributions in accordance with the superannuation guarantee legislation but not exceeding in respect of the maximum contributions base; and
- Specified notice of termination provisions which comply with, at a minimum, the NES.
- Our long-term commitment to maintaining a safe work environment and positive safety culture with shared accountability for employees, contractors, advisors and families.
- Our focus providing support and investing in the learning and development opportunities and career pathways for our employees.
- A Remuneration Policy that includes support for families living and working in remote locations who have limited access to childcare and/or have children in boarding schools by providing a remote family support allowance.
- A Health and Safety policy that actively support of our employee's health and wellbeing with initiatives around mental and physical health, including, but not limited to, the implementation of Fatigue Management Guideline.
- Dedicated human resources team who are committed to develop and retain engaged employees across the business and grow our own leaders within farm and corporate teams.
- Promoting and enhancing diversity, specifically gender diversity and be recognised as an employer of choice by fostering a healthy, positive and inclusive culture.
- Independent and tailored Employee Assistance Program for employees and their families offering a wide range of services in areas of physical and mental wellbeing, career, conflict resolution, money management and legal assistance.
- Established grievance mechanisms and Whistleblower policy.



Warakirri Cropping also uses a network of service providers e.g. agronomists, agricultural consultants and contractors who are local to the regions in which we operate. We continue to foster the strong relationships forged over 25+ years. Our relationship with service providers is covered by detailed service agreements which stipulate service level expectations, roles and responsibilities including the obligation for our service providers to adhere to our Code of Ethics and Conduct, uphold strong professional standards and meet all legal requirements. Where third party contractors are engaged to do works or provide services, Warakirri Cropping ensures that:

- We have a contracting agreement in place with all contractors which includes service level expectations.
- the Contractor is paying any workers in accordance with any relevant industrial instruments (i.e. a modern award or relevant enterprise agreement);
- where applicable, the Contractor is complying with the relevant pay slip and record keeping requirements in accordance with the Fair Work Regulations; and
- the Contractor holds appropriate workers' compensation or income protection insurances and public liability insurances.



## Farming Supplies

Due to the scale of our operations, Warakirri Cropping has entered into a national procurement agreement for our farming supply requirements. For FY 2023, approximately 90% of our farming inputs, including but not limited to fertiliser, seed and other agricultural chemicals, are sourced from one large-scale Australian domiciled supplier of agricultural products. The remaining 10% of farming inputs include those that are sourced on an ad-hoc basis from alternative local Australian domiciled suppliers in situations where our requirements cannot be met under our national procurement agreement, for example due to product unavailability.

Other ad-hoc farming supplies include, but not limited to, machinery, uniforms, personal protective equipment (PPE), IT equipment and office supplies which are typically sourced from multinational suppliers.

We have identified the following modern slavery risk factors within our Farming Supplies category:

### ■ Sector and Industry risks – **low** to **medium** risk

- Our major supplier has reported the use of unskilled, temporary or foreign labour in their workforce. However, we have contract agreements in place with all suppliers which includes service level expectations and an obligation for our suppliers to meet all legal requirements, which includes the requirement to pay their employees in accordance with any relevant industrial instruments. Furthermore, we have implemented contractual obligations for our major supplier to report any identified instance or risk of modern slavery.
- In addition, our major supplier has reported engaging with 'at risk' industries which may be considered at a higher risk of forced labour. While our supplier has reported a number of controls to minimise the risk associated with the 'at risk' industries, Warakirri Cropping recognises that this may indirectly link us to adverse human rights impacts.
- Our uniforms and PPE are sourced from Australian based and branded companies.

### ■ Products and Services risks – **low** to **medium** risk

- Our major supplier of fertiliser and agricultural chemicals has reported that the products sold through their wholesale and retail branches are sourced from major Australian companies who have acknowledged the heightened modern slavery risk that may be present in their underlying supply chains for this product.
- Whilst our major supplier of cotton seeds has acknowledged the heightened risk of child labour and forced child labour associated with the productions in India, it has reported that the cotton seed sourced by them for re-sale is from cottonseed grown locally by Australian farmers. Our supplier has also confirmed that the production of other seed varieties did not present a high risk of modern slavery.

### ■ Geographic risks – **low** to **medium** risk

- We have assessed that, although our supplier source our inputs from Australian companies, the countries from which our inputs (e.g., fertiliser) originate, may have inadequate protections for workers, including no or weak capacity to effectively monitor workplace standards and enforce compliance with national standards. This risk is however considered reduced through the measures our supplier and their third parties have implemented.

Overall, we have assessed our modern slavery risk in our **Farming Supplies** category to be **low** to **medium**. This assessment is based on the controls we, and our underlying suppliers and their third-parties, have implemented to counter the above identified risk factors including, but not limited to:

- We conduct extensive due diligence prior to the appointment of suppliers / service providers. This process is covered by our External Service Providers guideline which includes extensive procedures of the selection, appointment and monitoring of both outsourcing arrangements for material business activities, and the engagement of professional advisors and key business partners.
- We have entered into detailed service agreements with all our suppliers which include service level expectations, roles and responsibilities and an obligation for our service providers to uphold strong professional standards and to, at all times, meet all health & safety and other legal requirements. For our major supplier, a large-scale business, this also includes the obligation to protect human rights in its operations and supply chains and the requirements to actively identify and report on any indication of modern slavery within its operations and supply chains. In doing so, our major suppliers issue annual modern slavery statements outlining the risks in each area of its business operations and supply chains.
- We strive to source responsibly and sustainably and actively seek to understand our supplier's operations and their underlying supply chain. During the reporting period, we conducted a detailed review of the actions taken by our suppliers to combat the risk of modern slavery within their supply chains through critically reviewing their issued modern slavery statement as part of our risk management measures.





## Product Marketing

Warakirri Cropping's Product Marketing process includes the storage, transportation and sale of our product (grain, oilseed and cotton fibre) to end customers. Warakirri Cropping has a concentrated customer base that is approved by its Board and subject to counter party financial viability risk assessment. Our top five customers account for 63% of product sales, with the top 10 customers making up 80% of the total product sales.

We have identified the following modern slavery risk factors within our Product Marketing process:

- **Sector and Industry risks – low risk**
  - Whilst no instance of modern slavery has been identified, we acknowledge that in the transportation and storage of our product, there is likely to be the use of unskilled, temporary, seasonal or foreign labour by our contractors.
- **Products and Services risks – low risk**
  - Some of our delivery timeframes during harvest period may require contractors to engage in overtime work.
- **Geographic risks – low to medium risk**
  - The countries from which the buyers of our produce originate, or provide service to, may have inadequate protections for workers, including no or weak capacity to effectively monitor workplace standards and enforce compliance with national standards.

Overall, we have assessed the modern slavery risk in our **Product Marketing** category to be **low**. This assessment is based on the controls we have in place to counter the above identified risk factors including, but not limited to:

- We have contract agreements in place for the transportation and storage of our product which includes reasonable service level expectations and fair payment terms and an obligation for the contractor to pay their workers (if any) in accordance with any relevant industrial instruments (i.e. a modern award or relevant enterprise agreement);
- Review 100% of the modern slavery statements of the top 10 customers, and others who had published a statement to better understand our customer's exposure to modern slavery risk. The majority of our customers are large-scale businesses that have an obligation to protect human rights in their operations and supply chains and the requirements to actively identify and report on any indication of modern slavery within their operations and supply chains.

#### 4. Risk Management Progress and Continued Actions

Risk management is an important part of Warakirri Cropping’s normal business operations, processes and strategy. The approach to risk management is not intended to eliminate risk completely, rather providing a sound framework to identify and manage risks, maximize opportunity, minimise adversity and to achieve overall improved outcomes based on informed decision-making. Warakirri Cropping has implemented a Risk Management Strategy and Program (RSMP) that is in line with AS/NZ 31000. The RSMP documents the process for identifying, monitoring, and management of material risks associated with Warakirri Cropping’s business activities. We manage the identified risks, including the risk of modern slavery, by implementing controls designed to mitigate those risks to an acceptable level as defined by the Board’s risk appetite.

Warakirri Cropping continues to monitor the effectiveness of the control measures (as outlined in section 3 of this statement put in place to address the modern slavery risks identified in its operation and supply chains.

Consistent with our previous statement we identified some additional controls and other measures to enhance the mitigation of modern slavery risk across our Operational Implementation, Farming Supplies and Product Marketing categories. Progress on these action items combined with additional measures identified during the FY 2023 reporting period are outlined in the table below:

CATEGORY	FY 2023 ACHIEVEMENTS	2024 PRIORITIES
<b>Operational Implementation</b>	<ul style="list-style-type: none"> <li>- Modern slavery e-Learning module allocated to employees with direct responsibility for managing procurement activities.</li> </ul>	<ul style="list-style-type: none"> <li>- Implementation of a whistleblower and grievance hotline enabling reporting of issues or concerns.</li> <li>- Continuing to prioritise the People and Community pillar of our long-term sustainability plan including enhancing the health and wellbeing of our people and support our people and the local communities in which we operate.</li> </ul>
<b>Farming Supplies</b>	<ul style="list-style-type: none"> <li>- External Service Provider guideline proposed amendments to include modern slavery risks assessment as part of service provider onboarding.</li> <li>- Modern slavery clause requiring active monitoring and reporting of modern slavery risk has been included in the contractual agreements with our key suppliers covering farming inputs i.e. fertiliser and agricultural chemicals, including our national distribution arrangement.</li> </ul>	<ul style="list-style-type: none"> <li>- Evaluate third-party management system to aid the ongoing monitoring of our contractor and suppliers including, but not limited to, an assessment of modern slavery risk.</li> <li>- Continual review contractual agreements to include modern slavery clause requiring active monitoring and reporting of modern slavery risk.</li> </ul>
<b>Product Marketing</b>	<ul style="list-style-type: none"> <li>- Ongoing review and analysis of our customers Modern Slavery Statements better understand the risk of Warakirri Cropping causing, contributing, or being directly linked to modern slavery practices.</li> </ul>	<ul style="list-style-type: none"> <li>- Include modern slavery risk assessment as part of counter-party approval process.</li> </ul>

Additionally, Warakirri Cropping has implemented policies which assist in the effective management of modern slavery risks.

#### **Policies and Guidelines:**

Warakirri Cropping has implemented the following policies and guidelines which have been identified as relevant for the effective management of modern slavery risk. These following policies and guidelines are easily accessible by all employees and available to contractors:

- **Code of Ethics and Conduct:** to ensure high standards of corporate and individual behaviour by all employees and that stakeholders have confidence in the integrity, trust and collaboration of Warakirri.
- **Agriculture Remuneration Guideline:** outlines the remuneration framework for corporate, farm and casual employees to ensure employee's remuneration, short term incentives and long-term incentives, are reviewed and communicated in a fair and transparent manner with the appropriate levels of confidentiality.
- **Whistleblower Policy:** aims to provide employees, contractors and agents with a supportive working environment in which they feel confident to be able to raise issues of legitimate concern to them and to Warakirri.
- **Complaints Handling Policy:** to ensure fair, efficient and accessible avenue for expressing dissatisfaction and resolve complaints fairly and efficiently.
- **Compliance Reporting Policy:** to ensure that any matters that have occurred which may be in contravention of applicable laws and regulations, Warakirri's processes, policies, guidelines or contracts or agreements with third parties are identified and appropriately reported.
- **Human Resources Policy:** a framework for human resource arrangements which is supported by guidelines for talent acquisition, remuneration, unacceptable behaviour and grievance procedures.
- **Health, Safety and Environment Policy:** establishes Warakirri Cropping's commitment to ensuring all employees, contractors and visitors experience a healthy and safe work environment, enabling them to return safely home each day. The policy provides an overview of the workplace health, safety and environment (HS&E) management system which deals with the management of HS&E risks associated with Warakirri Cropping's business operations, including but not limited to implemented procedures to deal with fatigue management.
- **External Service Provider Guideline:** which governs the appointment and monitoring of external service providers (including suppliers). The guideline covers both outsourcing arrangements for material business activities, the engagement of professional advisors and key business partners.

All policies reviewed and updated at regular intervals by Warakirri's Audit, Risk and Compliance Committee and approved by Warakirri Cropping's Board

## **5. Consultation and Review Process**

In drafting this Modern Slavery Statement, we coordinated a consultation process with input from key personnel within Warakirri Cropping and Warakirri Asset Management who have extensive knowledge of the business operations, supply chain and an understanding of our obligation to identify modern slavery risks and the protect human rights of the people in our business operation and supply chain.

This Modern Slavery Statement will be reviewed annually by Warakirri Cropping's Board to ensure it complies with relevant laws and remains relevant and effective.

This Modern Slavery Statement was reviewed and approved by the Board on 7 December 2023.



**James McKay**  
**Director – Warakirri 2 Pty Ltd**



## Appendix – Mandatory Criteria

REF	MANDATORY CRITERIA	SECTION NUMBER
A	Identify the reporting entity.	Sections 1 and 2
B	describe the reporting entity's structure, operations and supply chains.	Section 2
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.	Section 3
D	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.	Sections 3 and 4
E	describe how the reporting entity assesses the effectiveness of these actions.	Sections 3 and 4
F	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 5
G	provide any other relevant information.	Section 4