

Modern Slavery Policy

Cropline Group Pty Ltd and its controlled entities (“the Company”) adopt a risk-based approach to identifying and managing modern slavery risks across its operations and supply chains. Modern Slavery is a crime and violation of human rights and is defined under the Australian *Modern Slavery Act 2018* as including eight types of serious exploitation:

- trafficking in persons – trading in slaves or financing slave trading
- slavery - owning a person.
- forced labour - forcing a person to work by coercion or threats.
- servitude - significantly restricting a person’s freedom and forcing them to work.
- forced marriage - a marriage without free and full consent.
- debt bondage – a person works to pay off a large debt, for an unlimited time or where the value of the work is not applied to the debt.
- deceptive recruiting – a recruiter charges a fee for the job offer, confiscates identity documents, deceives a person about personal freedom or their ability to leave the job; and
- child labour – exploiting children, depriving them of education or making them work in unsafe working environments.

1. Purpose

The purpose of this Policy is to prevent, detect and respond with mitigating controls to the risk of Modern Slavery occurring within the Company, its supply chain or any other business relationships. It also serves to demonstrate the Company’s commitment to doing business only with those who fully comply with the Act and to ensure its own compliance with the Act.

2. Scope

This policy applies to the Company and may also apply to contractors, labour hire personnel, and other persons or entities engaged by or working with the Company, including associated entities, where the Company exercises operational control or where application of this policy is required by contract or site requirements.

This includes all persons working for, with, or on behalf of the Company in any capacity, including employees, directors, officers, external consultants, third-party representatives, and business partners.

This policy should be read in conjunction with the Company’s Code of Conduct.

3. Definitions

Associated Entity: Any entity that operates in connection with the Company through commercial, operational, or contractual arrangements, but is not controlled by it.

Due Diligence: The process of identifying, assessing, and managing risks prior to and during engagement.

High-Risk Supplier: A supplier operating in industries, locations, or conditions where modern slavery risks are elevated.

Minimum Standards (Annexure A – Minimum Standards Expected of Suppliers):

The minimum legal and ethical requirements relating to Modern Slavery expected of suppliers and business partners, as set out in Annexure A.



Modern Slavery: As defined under the Modern Slavery Act 2018 (Cth), including all forms of serious exploitation.

Operational Control: Where the Company has the ability to direct or influence how work is performed, including through policies, procedures, supervision, or contractual arrangements, even where there is no direct employment or ownership relationship.

Remediation: Actions taken to address and resolve identified instances of modern slavery.

Supply Chain: The network of organisations, people, activities, and resources involved in providing goods or services to the Company.

4. Policy Statement

The Company has a zero-tolerance approach to Modern Slavery and is committed to acting ethically and with integrity in all business dealings and relationships. The Company will implement and enforce effective systems and controls to minimise the risk of Modern Slavery occurring within its operations and supply chains.

The Company is committed to ensuring transparency in its approach to addressing Modern Slavery risks, consistent with its obligations under the Modern Slavery Act 2018 (Cth).

The prevention, detection, and reporting of Modern Slavery within the Company's operations and supply chains is the responsibility of all persons working for, or on behalf of, the Company.

The Company expects suppliers and business partners to meet the Minimum Standards and maintain appropriate controls to identify, assess, and manage Modern Slavery risks within their operations and supply chains.

As far as reasonably practicable, suppliers are expected to:

- a) exceed the Minimum Standards, and promote best practice and continuous improvement; and
- b) monitor compliance with the Minimum Standards through supplier assessment processes as appropriate for their business, taking into account all relevant factors such as country risk and product risk.

5. Policies and procedures

The Company currently operates the following policies that support awareness of acceptable practice and behaviour, and the reporting mechanisms to raise concerns of inappropriate behaviour:

- CLG-HRMS01-POL-018 Code of Conduct Policy
- CLG-HRMS01-POL-020 Equal Opportunity Policy
- CLG-HRMS01-POL-010 Bullying and Harassment Policy
- CLG-HRMS08-FRM-039 Supplier and Subcontractor Prequalification Form

6. Procedure

The Company meets its obligations under the Modern Slavery Act 2018 (Cth) through the following measures:

6.1. Procurement of goods and services

Procurement of goods and services will, as far as reasonably practicable, be conducted in a manner that ensures the Company sources from entities that comply with their obligations under the Act.

The level of due diligence undertaken will be proportionate to the risk profile of the goods or services being procured. This may include:

- Assessing suppliers based on risk profile.
- Requesting the supplier's most recent Modern Slavery Statement (where applicable).



- Obtaining declarations of compliance.
- Reviewing supplier policies, controls, and practices.
- Requesting details of actions taken to identify and address modern slavery risks within their operations and supply chains.

6.2. Contract management and monitoring key suppliers/offshore partners

Where appropriate, supplier agreements will include provisions requiring:

- Compliance with the Modern Slavery Act 2018 (Cth).
- A requirement to take reasonable steps to ensure that modern slavery does not occur within the supplier's operations or supply chains, including subcontractors.
- Prohibition of forced labour, human trafficking, and child labour.
- Notification to the Company of any actual or suspected breach or risk of modern slavery.
- Flow-down obligations to subcontractors and supply chain participants.

The Company reserves the right to suspend or terminate supplier arrangements where non-compliance with this Policy or the Act is identified.

6.3. Supplier Management and Ongoing Monitoring

The Company will manage and monitor supplier relationships using a risk-based approach, including:

- Periodic supplier reviews and reassessment of risk.
- Ongoing engagement with key suppliers and business partners to identify and address modern slavery risks.
- Escalation and review of high-risk suppliers.
- Working collaboratively with suppliers to implement practical and commercially viable risk mitigation measures.

6.4. Modern Slavery Statement

The Act requires that a modern slavery statement be given annually to the Minister. The Company shall ensure compliance with this requirement.

7. Responding to concerns of modern slavery practices

Employees, including contractors, are urged to report any suspected breaches of Modern Slavery within any segment of the Company's supply chains or business operations to their manager or the Human Resources Department promptly.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously.

In an emergency and if someone is in immediate danger, please call Triple Zero (000) for police assistance.

The Company will not tolerate retaliation against any person who raises a concern in good faith.

8. Remediation and Response

Where modern slavery is suspected or identified, the Company will:

- Assess the nature and severity of the risk.
- Take immediate steps to prevent further harm.



- Engage with the supplier to address the issue.
- Consider suspension or termination of the relationship where appropriate.
- Support affected individuals where reasonably practicable.
- Document actions and outcomes.

9. Training and Awareness

The Company will ensure:

- Employees receive awareness training as part of onboarding.
- Targeted training is provided to high-risk roles (HR, procurement, operations).
- Ongoing communication reinforces expectations and reporting obligations.

10. Roles and Responsibilities

Role	Responsibility
Managing Director	Oversight of compliance and approval of the Modern Slavery Statement
Senior Leadership Team	Implementation of this Policy and risk management across operations
HR Department	Training, reporting mechanisms, and investigation support
Procurement / Operations	Supplier due diligence, onboarding, and monitoring
Managers / Supervisors	Ensuring team awareness and compliance
Employees / Contractors	Reporting suspected breaches and complying with this Policy

11. Monitoring and Continuous Improvement

The Company will monitor the effectiveness of this Policy through:

- Supplier due diligence completion rates.
- Training completion metrics.
- Incident reporting and outcomes.
- Periodic internal reviews.

Continuous improvement initiatives will be implemented where gaps are identified.



Kyle Sutherland
 Managing Director
 Cropline Group Pty Ltd
 07 April 2026



Annexure A – Minimum Standards Expected of Suppliers

<p>No forced or bonded labour</p>	<p>Employment shall be freely chosen. Suppliers shall:</p> <ul style="list-style-type: none"> a) not use any type of forced labour (any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person), bonded labour (work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange) or indentured labour (in which an employer forbids workers from leaving employment at the worker's discretion); b) respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment; and c) ensure that workers are free to leave their employer after reasonable notice.
<p>No child labour</p>	<p>Suppliers shall comply with the minimum legal working age in the country in question or, in the absence of such law, by the International Labour Organisation (ILO) Convention 138.</p> <p>Suppliers must be able to verify the age of all workers to ensure compliance.</p> <p>Suppliers must accept the principles of remediation for child and underage workers, and, where such labour is discovered, prioritise the welfare and best interests of the affected individual, establish and implement appropriate remediation for those employees and introduce effective systems to prevent the use of child labour in the future.</p>
<p>Wages, benefits, and transparent record keeping.</p>	<p>Suppliers must comply, at a minimum, with all laws regulating local wages, overtime compensation, and legally mandated benefits.</p> <p>Record keeping must be accurate and transparent.</p> <p>Employees must be provided with written, understandable information about their employment conditions before they enter employment, and about their wages for each pay period.</p> <p>Deductions from an employee's wages must only occur where they are lawful and permitted under applicable legislation or an industrial instrument. Any permitted deduction must be authorised in writing by the employee and must be principally for the employee's benefit.</p> <p>All disciplinary matters must be managed in accordance with best-practice standards and relevant legislation and documented appropriately.</p>
<p>Working hours</p>	<p>Working hours must comply with applicable local laws.</p> <p>Employees should not be required to work more than the maximum hours per week as stipulated by local laws or, in the absence of such law, by the applicable ILO convention.</p> <p>Overtime shall be voluntary and agreed upon, shall not be excessive, shall not be requested on a regular basis and shall be compensated as prescribed by applicable local laws.</p>
<p>No discrimination</p>	<p>All conditions of employment and employment-related decisions shall be based on merit and the inherent requirements of the role.</p> <p>Suppliers shall not discriminate based on any protected attribute under applicable Commonwealth or State legislation or based on any personal characteristics.</p> <p>Suppliers must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.</p>
<p>No harassment or abuse</p>	<p>Employees shall be treated with dignity and respect.</p>



	Suppliers shall maintain a workplace that is free from bullying, harassment (including sexual harassment), intimidation, and physical, verbal or psychological abuse.
Freedom of association, grievance mechanisms and resources	<p>Suppliers shall respect the rights of employees to lawfully associate or not to associate with groups of their choosing, if such groups are legal in the country of operation.</p> <p>Employees should have the right to join or form trade unions of their choosing. Suppliers should not interfere with, obstruct or prevent legitimate related activities, such as collective bargaining.</p> <p>Employees are permitted to select worker representatives. Representatives should not be discriminated against or victimised and should have regular access to company management or an appropriate process to address grievances and other issues.</p> <p>Employees and worker representatives shall not be subject to adverse treatment for raising concerns in good faith.</p> <p>Suppliers must have a policy that allows employees to confidentially approach management with issues or concerns, on their own or through worker representatives.</p>
Working conditions	<p>Suppliers shall, so far as is reasonably practicable, ensure the health and safety of their employees. In addition, suppliers shall provide a safe and hygienic working environment free of health risks, considering relevant industry knowledge and any specific hazards.</p> <p>Employees shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied, and employees trained in their use.</p> <p>Where suppliers provide accommodation, it shall be clean, safe and meet the basic needs of employees.</p> <p>Employees will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation.</p> <p>Employees have the right to refuse work that is unsafe.</p>
Sub-contracting	Where sub-contracting is permitted, suppliers must have adequate processes in place to properly manage sub-contracting, ensuring that sub-contractors operate in accordance with this and any applicable business policy.
Migrant workers	<p>Migrant employees shall have the same entitlements as local employees as stipulated by local law.</p> <p>Suppliers shall ensure migrant employees are not subject to exploitation or coercion.</p> <p>Any commissions and other fees in connection with the employment of migrant employees must be covered by the employer.</p> <p>The employer must not require the employee to surrender identification documents.</p> <p>Employees employed through a third-party agent or contractors are the responsibility of the suppliers and are thus covered by these Minimum Standards.</p>
Hiring and regular employment	<p>Suppliers must provide each employee with a clear labour contract that contains all legally required employment terms, entitlements, and conditions in a language they understand.</p> <p>In addition, where possible, suppliers should work towards providing permanent employment for employees and avoid labour-only contracting arrangements, consecutive short-term contracts, excessive piece-work or false apprenticeship schemes to avoid obligations of regular employment to employees.</p> <p>Employees shall not be required to pay any recruitment, placement or employment-related fees at any stage of the hiring process. All costs associated with recruitment shall be borne by the employer.</p>



Monitoring, Audit & Compliance	<p>The Company reserves the right to request information demonstrating compliance and conduct audits or assessments of Supplier operations. Suppliers shall maintain adequate records to demonstrate compliance and cooperate with reasonable audit requests.</p> <p>Where a breach of these standards is identified, Suppliers shall promptly notify the Company (where required), implement corrective action plans within a reasonable timeframe and take steps to remediate affected employees.</p> <p>Suppliers are expected to actively monitor and improve their labour and ethical practices and identify, assess, and mitigate risks within their operations and supply chain.</p>
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