

## **MODERN SLAVERY STATEMENT**

This statement is published on behalf of Paraway Pastoral Company Pty Limited, ACN 14 122 572 641 of 70 McNamara Street, Orange, New South Wales (**Paraway**). This statement is made pursuant to the *Modern Slavery Act 2015* (UK) and the requirements of the *Australian Modern Slavery Act 2018* (Cth).

### **PARAWAY'S BUSINESS**

Paraway is committed to being a consistent and reliable supplier of quality produce from its pastoral enterprises and operating a sustainable business that targets long term returns whilst effectively managing short term risks.

### **PARAWAY'S POLICIES & PRINCIPLES**

Paraway strives to achieve the highest standards of ethical behavior in the conduct of its business activities. It supports and respects the protection of internationally proclaimed human rights. Paraway endeavors to avoid being complicit in human rights abuses and will not tolerate slavery, human trafficking, abusive or unfair treatment in its business or supply chain.

Paraway will take steps to ensure that slavery and human trafficking play no part in its business or supply chains by developing applicable policies and practices in relation to corporate responsibility, procurement, and human resources.

### **GOVERNANCE FRAMEWORK**

Paraway is committed to employing corporate governance practices that support our compliance with applicable standards and legislative instruments and align with community expectations. The Paraway Board plays the principal role in the direction of corporate governance. The Board's responsibilities include governing, guiding, and directing Paraway towards the satisfaction of company objectives and protecting the interests of our employees, shareholders and the community. The Board is accountable for ensuring the appropriate management of modern slavery risk, by providing appropriate governance and direction to operational leadership. The operational leadership is represented by the Chief Executive Officer (CEO), the General Counsel and operational General Managers. Each General Manager is responsible for the facilitation of the operational and strategic risk management.

### **OUR SUPPLY CHAIN**

Paraway seeks suppliers with similar values, ethics, and sustainable business practices, including those relating to human rights. Paraway acknowledges and recognises that the conduct of its suppliers can have a significant impact on Paraway's performance and reputation within the communities that it operates.

Paraway is implementing due diligence requirements for suppliers which highlights the need for suppliers take steps to avoid or eliminate slavery and human trafficking from their supply chain.

A significant number of our suppliers' operations are based in Australia. We believe these suppliers have a lower risk of modern slavery occurring in their supply chains as their operations are Australian based and they are required to comply with the Modern Slavery Act within their own supply chains.

However, our procurement activities do include purchasing goods and services from suppliers who provide products with overseas components, such as chemicals and equipment.

To better understand the initial baseline, Paraway intends to map out our key suppliers and service providers. This will enable us to undertake a risk assessment of any modern slavery risks, or potential risks, within our supplier's operations and supply chains. This in turn will allow the identification of high-risk suppliers who are either located in or source their goods from high-risk countries, for example, the procurement of machinery from suppliers who have manufacturing plants overseas. High risk suppliers will be requested to complete a Modern Slavery Supplier Questionnaire and allow us to ascertain whether they have implemented adequate steps to mitigate modern slavery risks and whether their supply chains follow an ethical sourcing policy.

Paraway intends to publish this statement on its website and make available to all contractors during their induction processes.

## **OUR PEOPLE**

Paraway will develop training modules for all relevant staff who manage supply relationships to stress Paraway's zero tolerance on slavery and human trafficking. This training will be conducted in conjunction with existing training programs.

Paraway understands that the environmental, social and governance risks relating to suppliers varies depending on their geographic location and size. The processes and systems that will be implemented by Paraway are proposed to reflect proportional risks.

As part of our human resources policies and procedures, Paraway seeks to ensure compliance with all relevant local laws and regulations. Paraway has in place procedures to manage employee welfare and endeavor to ensure all employees and contractors are paid at least the minimum entitlements applicable and regularly reviews those procedures.

## **PARAWAY'S GRIEVANCE AND FEEDBACK MECHANISM**

Paraway has whistleblower and complaints policies which provide employees and contractors an avenue to raise concerns in a confidential manner, including any modern slavery concerns. These policies will formalise existing practices within Paraway.

Paraway has not identified any instances of modern slavery or human trafficking associated with its own operations or through its supply chain throughout the 2021 financial year. In addition, Paraway has not received any concerns from its staff or contractors regarding modern slavery or human trafficking through the 2021 financial year.



Bruce Terry  
Chairman

29 June 2022