

15 April 2024

Elders Limited 2023 Modern Slavery Statement

Attached is the Elders Limited (ASX:ELD) 2023 Modern Slavery Statement, prepared pursuant to the *Modern Slavery Act 2018*.

This statement is also available on the [Australian Border Force Register for Modern Slavery Statements](#).

Further Information:

Peter Hastings, Company Secretary, 0419 222 489

Authorised by:

Peter Hastings, Company Secretary



MODERN SLAVERY STATEMENT

2023

For Australian Agriculture

Elders Limited ABN 34 004 336 636

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Message from the Managing Director and CEO

At Elders, our ambition is to lead sustainability and productivity to benefit our customers, communities, industry, people and shareholders. We recognise that respecting the human rights of our stakeholders is critical to our success. Through our employee network and a dedicated sustainability team, we work hard to identify and mitigate risks relating to modern slavery practices, both in our operations and supply chain.

I am pleased to present our Modern Slavery Statement for FY23. Elders' businesses are supported by a dynamic group of people and complex and diverse supply chains. This report is essential for tracking our success and progress in addressing and mitigating modern slavery risks.

At Elders, a key sustainability principle is to operate ethically and to the highest standard. As part of this principle, we make every effort to respect the human rights of our employees and our stakeholders. We recognise that modern slavery risks can appear in any industry that we engage with. Our policies and processes are designed to support our people in identifying, addressing and preventing the occurrence of modern slavery across our value chain.

In FY23, we continued to attribute ethical risk ratings to new suppliers and conduct independent site audits of suppliers of our own brand products in China and India. We collaborated with our suppliers to improve their business practices and procured a supplier due diligence platform to enable us to better engage with our suppliers on ethical risks in 2024.

We recognise that ongoing effort is required to address modern slavery practices in the global economy. We are committed to continuously improving our due diligence practices and will report on our progress in future Modern Slavery Statements.



Mark Allison
Managing Director and CEO

OUR PEOPLE¹

Employees **3,380**
57% male – 43% female²

Employees in Australia **3,377**
Employees in China – 3

Permanent employees **2,757**
57% male – 43% female

Casual employees **529**
41% male – 59% female

Fixed term contract employees **94**
43% male – 57% female

OUR SUPPLIERS

Direct suppliers³ **12,100**

Australian small business direct suppliers **9,300**

Direct supplier spend³ **\$2.6b**
approximate spend with direct suppliers

Ethical risk ratings **400**
suppliers given ethical risk rating in FY23

Site audits **5**
site audits conducted on key suppliers of own brand products

Modern slavery reports **0**
instances of modern slavery reported in our operations and supplier base

¹ As at 30 September 2023

² Including casual workers and workers on fixed term contracts in Australia and China. Does not include one Indonesia-based, full-time male employee.

³ Suppliers who supply goods or services directly to Elders, or one of our subsidiaries.

Our Modern Slavery Statement

This statement is made by Elders Limited as a joint statement under the Modern Slavery Act 2018 (Cth) for the period 1 October 2022 to 30 September 2023 (FY23). It covers Elders Limited and the following subsidiary reporting entities: Elders Rural Services Australia Limited (“Elders Rural Services”), Titan Ag Pty Ltd (“Titan AG”), Australian Independent Rural Retailers Pty Ltd (“AIRR”), Killara Feedlot Pty Ltd (“Killara Feedlot”) and B&W Rural Pty Ltd (“B&W Rural”). The purpose of this statement is to describe the actions taken by all entities within our operational control to identify and address the risks of modern slavery to people in our operations and supply chains.

The Modern Slavery Statement has been approved by the Board of Elders Limited and signed by our Managing Director and CEO.

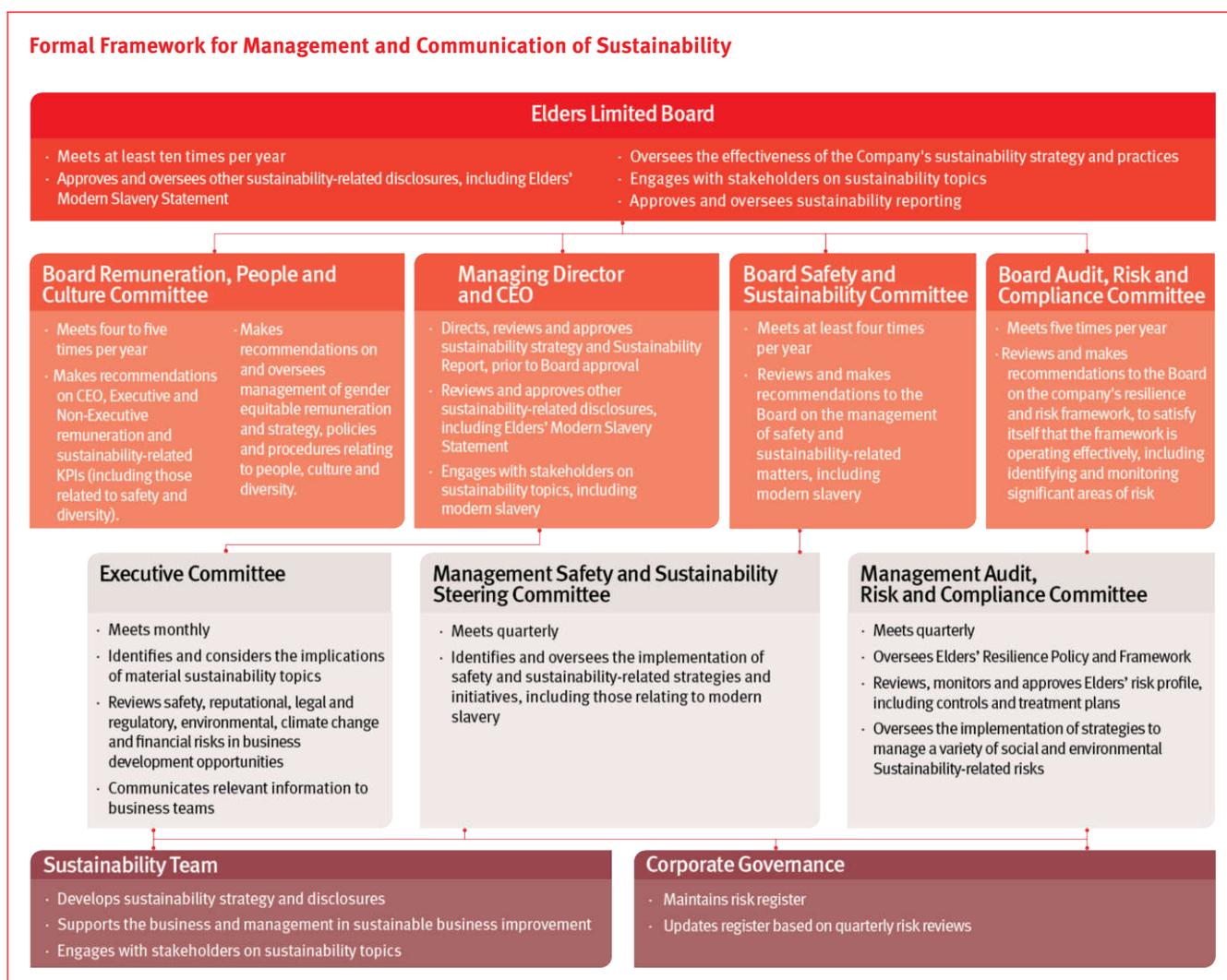
Our Approach

Elders is committed to respecting the human rights of our people and our stakeholders across the value chain. Our approach to managing modern slavery and broader human rights is informed by the United Nations’ Universal Declaration of Human Rights (UDHR) and International Labour Organisation (ILO) Conventions. We aim to support human rights in our operations and supply chain by avoiding causing or contributing to adverse human rights impacts through our own activities; seeking to prevent or mitigate adverse human rights impacts that are linked to our operations, products or services by our business relationships, and addressing such impacts when they occur.

Our Corporate Governance Framework

Our commitment to respecting the human rights of our people and our stakeholders is underpinned by our Corporate Governance Framework. Our Board oversees all matters relating to Elders’ economic, environmental and social sustainability, including modern slavery. Our Board and relevant governing committees meet throughout the year to oversee modern slavery risks and associated actions as outlined in the figure below.

The Board Safety and Sustainability Committee and the Management Safety and Sustainability Steering Committee provide a forum for communicating and managing sustainability-related matters, including modern slavery. The Management Safety and Sustainability Steering Committee comprises of members of Elders’ Executive team. In addition, our Sustainability team is engaged by our Board, Executive members and wider business to provide support and advice on engaging with our workforce, suppliers, customers and other stakeholders on the topic of modern slavery and managing modern slavery risk. Further information about how Elders is governed, including the structure and operation of our Board and governing committees, is available in our Corporate Governance Statement.¹



¹ Available online at <https://elders.com.au/for-investors/performance/periodic-reports/>.

About Elders

Our ambition is to lead sustainability and productivity to benefit our customers, communities, industry, people and shareholders.

Our Structure and Operations

Elders is a public company listed on the Australian Securities Exchange (code: ELD). We work closely with primary producers to provide products, marketing options and specialist technical advice across rural, agency and financial product and service categories. Elders operates a leading Australian rural and residential real estate agency and management network, which includes both company owned and franchise offices throughout Australia in both major population centres and regional areas. We also operate a top-tier beef cattle feedlot in New South Wales.

Our organisation is supported by our network of approximately 3,380 workers¹ across Australia. In FY23, we ceased operations in Elders Fine Foods in China with a limited workforce supporting the closure of operations. More information is available in our Annual Report.²

Our Business Model

Products and services

Rural Products

Elders is one of Australia's leading suppliers of rural farm inputs, including seeds, fertilisers, agricultural chemicals, animal health products and general rural merchandise. Our Retail Products division supplies these rural products to primary producers and corporate farm customers through 242 Elders owned retail stores. Additionally, we also provide professional production and cropping advice with 256 agronomists nationwide, including additional specialists operating through Elders Technical Services.

We also operate a Wholesale Products business supplying independently owned member stores, utilising the AIRR branding. AIRR also provides retail services through corporate owned stores and the Ag, Horse and Pet brand to independently owned member stores. Our backward integration strategy is facilitated through various brands, such as Titan AG, Optifert, Apparent, EPG Seeds and Pastoral Ag.

Agency Services

Elders provides a range of marketing options for livestock, wool and grain. Elders' livestock network comprises livestock employees and agents operating across Australia conducting on-farm sales to third parties, regular physical and online public livestock auctions and direct sales into Elders-owned and third-party feedlots and livestock exporters.

Elders is one of the largest wool agents for the sale of Australian greasy wool and operates a brokering service for wool growers. Our team of wool specialists assists clients with wool marketing, in-shed wool preparation, ram selection and sheep classing. In 2023, Elders commenced its wool handling operations, a \$25million investment in the Australian wool industry with operations in Perth and Melbourne. It is expected to reach full capacity in FY24. Elders also has a 50% interest in AuctionsPlus, an online livestock auction platform, and a 30% interest in Clear Grain Exchange (CGX), which is an online grain trading platform.¹

Real Estate Services

Elders' Real Estate Services include company owned rural agencies primarily involved in the marketing of farms, stations and lifestyle estates. It also includes a network of residential real estate agencies providing sales and property management services in major population centres and regional areas through company owned and franchise offices.² Other services include water broking and commercial real estate.

Financial Services

Elders distributes a wide range of banking, finance, insurance and warranty products and services through its Australian network. We work together with a number of partners to deliver some of these offerings; Rural Bank for banking, StockCo for livestock funding products and Elders Insurance (a QBE subsidiary) for general insurance. In addition, we provide Livestock Funding and a Livestock in Transit Delivery (LIT) Warranty Service, both which complement our Agency business, and Home Loans and Commercial Finance Brokerage model. Collectively, these services enable us to offer a broad spectrum of products to help our customers grow their business and manage cash flow and risk.

Feed and Processing Services

In Australia, Elders operates Killara Feedlot, a diversified business incorporating grain-fed beef distribution, grass-fattening operations, cow manure processing and irrigated corn production in Quirindi in New South Wales.³

¹ These entities are not subsidiaries over which Elders has operational control.

² Franchised offices are not subsidiaries over which Elders has operational control.

³ In FY22, Elders made the decision to close its Shanghai-based meat distribution business, Elders Fine Foods. Its operations have been progressively wound down throughout 2023.

¹ Including casual workers and workers on fixed term contracts in Australia.

² Available at: <https://elders.com.au/for-investors/performance/periodic-reports/>.

Our People

The success of Elders is reliant on us attracting, retaining and developing the best people in agriculture and ensuring our people are engaged and enabled to create meaningful work outcomes.

We are committed to attracting and retaining quality people and maintaining a workplace that upholds the highest standards of safety so they can go home safely each day. Our workforce profile is reported to our Executive and Board monthly, where any issues are discussed and changes to our management approach are agreed for implementation. We measure our progress through our annual Employee Effectiveness Survey, regular performance reviews, training and assessments.

We have visibility of the employment terms and conditions of our direct workforce in alignment with the Fair Work Act 2009 (Cth) and applicable awards which set out the entitlements of our Australia-based workers, including rights relating to remuneration, minimum wage, work hours and freedom to associate with an industrial association. Our Compliance Policy³ requires us (as well as all our directors, employees, agents, contractors and consultants) to comply with all applicable laws and regulations. Management of employee engagement and enablement is a condition of our Executive level Short-Term Incentives.⁴

Our Workforce Profile (as at 30 September 2023)

Workforce		FY22		FY23	
		Australia	China	Australia	China ¹
Full time employees	female	868	22	956	3
	male ²	1492	16	1564	-
Part time employees	female	237	-	279	-
	male	52	-	49	-
Casual employees	female	221	1	216	-
	male	305	3	313	-
Permanent employees	female	1055	10	1182	2
	male	1505	10	1573	-
Fixed Term Contract employees	female	50	11	53	1
	male	39	3	40	-

¹ In FY22, Elders made the decision to close its Shanghai-based meat distribution business, Elders Fine Foods. Its operations have been progressively wound down throughout 2023.

² Elders also employs one manager based in Indonesia.



Livestock transport - The Kimberley WA

³ An internal document.

⁴ For more information, see our Remuneration Report within our 2023 Annual Report, available at <https://elders.com.au/for-investors/performance/periodic-reports/>.

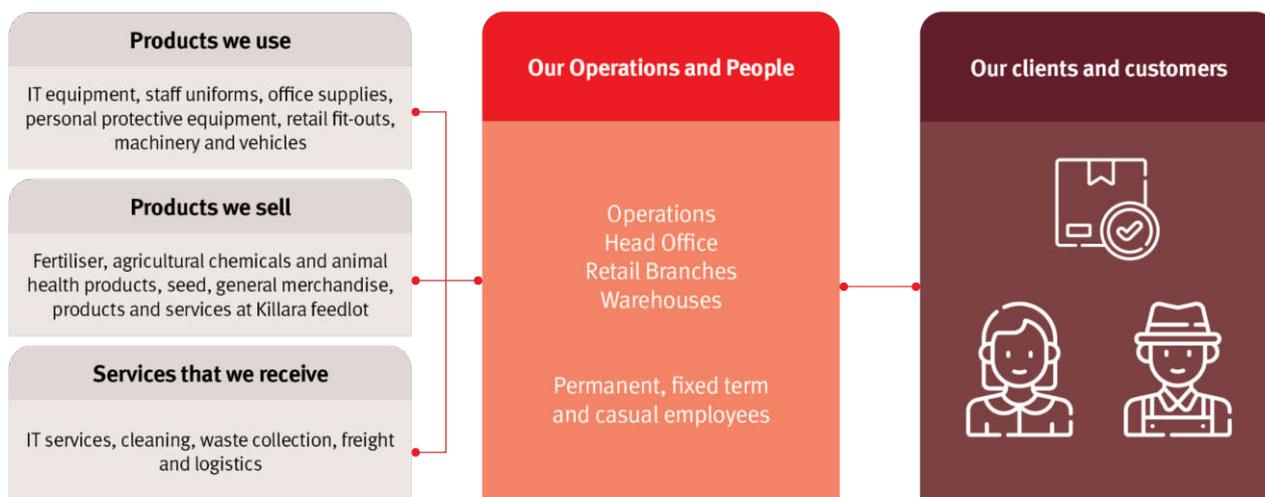
Our Supply Chains

Our businesses are supported by complex and diverse supply chains comprising global manufacturers and wholesalers as well as local small businesses. This includes approximately 12,100 "direct suppliers",⁵ of which more than 9,000 are Australian small businesses.⁶ We source products for resale and for our own internal use, as well as services. Our total spend on our direct suppliers in FY23 was approximately \$2.6 billion. Our main spend categories were agricultural inputs, feedlot cattle, motor vehicles and rent. The products we source for resale include:

	Agricultural Chemicals	Fertiliser	Animal Health Products	General Merchandise	Seeds	Agricultural Machinery and equipment	Livestock ¹
Elders Rural Services	●	●	●	●	●	●	●
AIRR	●	●	●	●	●		
Titan AG	●	●					
Killara Feedlot							●
B&W Rural	●	●	●	●	●		

¹ Elders Rural Services provides agency services for clients buying and selling livestock.

The diagram below provides a high-level view of our value chain. It outlines the suppliers providing goods and services to Elders and how these are used in our operations.



- **Products we use** – includes items used in our operations. These products are generally sourced from large, multinational suppliers. Fuel for our fleet vehicles and equipment is purchased in Australia. Killara Feedlot sources cattle and feed from growers operating in Australia and agricultural chemicals, animal health products and irrigation equipment from Elders and other Australia-based retailers.
- **Products we sell** – includes finished products that are sold through our wholesale and retail branches. These products are generally sourced from large, multinational suppliers.
- **Services that we receive** - we procure the professional services of consultants and advisors from Australia as required. IT support is provided by our supplier, HCL, whose workforce is predominately stationed in South Australia, with some work outsourced by HCL to staff operating in India. Elders Rural Services also engages contractor livestock agents, real estate agents and agronomists.

Our supply chains beyond our direct suppliers are extensive. Upstream, they include workers operating locally and internationally in:

- sourcing or producing raw materials and components of the products we use or sell
- transporting, processing, storing and distributing raw materials, components and finished products for our suppliers and us
- providing goods or services that our suppliers, and other members of our supply chains use in their own operations

Downstream, they include workers operating on farms producing crops and livestock, workers in food processing facilities and buyers and sellers of real estate, water, livestock, grain and wool.

⁵ Suppliers who supply goods or services directly to Elders, or one of our subsidiaries.
⁶ Businesses with a turnover of less than \$10 million per annum.

Risk Assessment

We are committed to monitoring our risk environment to identify and address modern slavery risks within both our operations and supply chain, which support us in ensuring effective mitigation measures are in place.

Risks In Our Operations

We consider the risk of modern slavery in our workforce to be low. This is based on:

- the location in which we predominantly operate, being Australia (which is recognised as having a low prevalence of modern slavery)¹
- our recruitment, employee engagement and remuneration practices²
- our grievance reporting mechanisms²
- our actions to ensure the safety of our people²
- feedback on engagement, enablement and safety received from our employees through our independently administered, annual Employee Effectiveness Survey. During FY23, Elders achieved results which placed it equal to or above the high performing benchmark compared with other companies globally³

We use a range of controls to mitigate and manage modern slavery risks associated with our operations. These include policies that promote transparency and safety; employee training to socialise our expectations and provision of informal and formal channels for disclosing concerns.⁴

Risks In Our Supply Chains

We recognise that modern slavery risks can appear in any industry that we engage with. As a business, we have a responsibility to respect human rights within our supply chain.

For Elders, the cleaning and hospitality industries, which are considered at a higher risk of forced labour, present a key risk of direct exposure to adverse human rights impacts.⁵ Our workforce procures goods and services from these industries primarily from the local community, sometimes through third-party service providers. We recognise that the workers in these industries are inherently at a higher risk of exploitation due to presence of a large proportion of migrant and unskilled workers who may be unaware of their rights and ability to access protection.⁶

We consider the risk of modern slavery in the suppliers we engage within these industries to be low to medium. This is based on the controls we have in place to manage risks associated with the engagement of suppliers, including:

- direct engagement where practicable (as opposed to engagement through organisations using subcontractors)
- management oversight through our Ethical Contracting Framework
- our approach to supplier relationship management and the terms of our standard form services agreements.⁷

Risk assessment of suppliers

We continued to build on our risk assessments across our suppliers in our direct and indirect procurement supply chains, extending our focus from our top spend and own-brand suppliers to all direct suppliers in our direct procurement supply chains. These assessments included the following actions:

- compiling and reviewing supplier information from key personnel and systems across our corporate group (including the reporting entities referred to in this statement) to identify our suppliers, how much we spend on them, the types of products we procure from them and other relevant information
- engaging with our suppliers to obtain information from them to inform our risk assessment
- researching publicly available information relating to our suppliers, including information about their manufacturing processes and locations of operation, their actions on sustainability and how they address modern slavery in their operations and supply chains
- utilising publicly available information on the prevalence of modern slavery in different locations and product categories, including news media, the 2023 Global Slavery Index and the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor
- on-site audits of suppliers of own-brand products operating in China and India, conducted by independent auditors
- assigning risk ratings to our suppliers based on the outcomes of the above actions

¹ Walk Free Foundation, 2023, 'Global Slavery Index', accessed 9 February 2024 <www.globalslaveryindex.org>.

² Outlined in Actions Addressing Modern Slavery Risks In Our Operations.

³ Benchmarking and the administration of our survey is conducted independently by Korn Ferry.

⁴ For more information, please see Actions Addressing Modern Slavery Risks In Our Operations.

⁵ Australian Red Cross, 2020, 'Addressing Modern Slavery – A Guide for Australian Businesses', accessed 9 February 2024, <<https://www.redcross.org.au/migration/support-for-trafficked-people/modern-slavery-resources/>>.

⁶ Walk Free Foundation, 2023, 'Global Slavery Index', accessed 9 February 2024, <<https://www.walkfree.org/global-slavery-index/country-studies/australia>>.

⁷ Outlined in Actions Addressing Modern Slavery Risks In Our Supply Chains.

Risk assessment overview

In FY23, our people applied risk ratings on 400 suppliers, in accordance with our Ethical Contracting Framework⁷. We rated 328 suppliers 'low' risk, 68 suppliers 'medium' risk, 1 supplier 'high' risk, 1 supplier 'high-very high' risk, 2 suppliers as 'very high risk' and no suppliers 'critical' risk. For all suppliers that were rated 'high', 'very high' and 'critical' risk, extended due diligence is required to be undertaken in accordance with our Ethical Contracting Policy and Framework.

We recognise that heightened risks may be present in points of our supply chains where we have little to no visibility, influence or control. For example, in the origination of our supply chains, the procurement of the raw materials incorporated in the products we source from our direct suppliers may involve a higher risk of modern slavery. Downstream, additional risks may be present in the operations of our customers working in horticulture and the meat processing facilities we engage with as agents for our livestock clients, or for purchasers of our Killara Feedlot cattle. These industries have a higher proportion of unskilled and migrant workers, and inherently a higher risk of worker exploitation.⁸

The following section contains an outline of the risks associated with the products we sell and use at Elders and a discussion of the actions we are taking or plan to take to address these risks.



Elders Gatton Branch, QLD

⁷ Outlined in Actions Addressing Modern Slavery Risks In Our Supply Chains.

⁸ Walk Free Foundation, 2023, 'Global Slavery Index', accessed 9 February 2024, <<https://www.walkfree.org/global-slavery-index/country-studies/australia>>.

Products we sell

Products	Description	Modern Slavery Risk
Fertiliser	We source the majority of fertiliser sold through our wholesale and retail branches from major, Australian companies. Due diligence undertaken to date has not identified any high modern slavery risks in our direct suppliers. Our major suppliers have acknowledged that heightened risks may be present in their own supply chains and have disclosed several measures to manage those risks, including through policy implementation, employee training and working with third parties to undertake supplier due diligence. No instances of modern slavery were identified in the reporting period in respect of our suppliers of fertiliser. A key ethical risk managed in 2022 in respect of our fertiliser suppliers related to the conflict between Russia and Ukraine and associated sanctions that have been implemented as a result. Elders has ensured that it has not purchased stock from Russia since the relevant sanctions began.	Low to medium
Agricultural chemicals and animal health products	Due diligence undertaken to date has not identified any heightened risk of modern slavery associated with the manufacture of chemical products. We do, however, recognise the higher prevalence of modern slavery in countries we source, directly and indirectly, some chemical products from. We source most of our chemical products from Australian companies, but source most of our own-brand chemical products from China and India. Purchases from these suppliers represent less than 25% of our overall spend on our direct suppliers. Given our direct and long-standing relationships with our own-brand product suppliers, an elevated focus has been placed on them through extended due diligence, regular site visits, investigation through supplier questionnaires and onsite audits by independent third parties. Information from these sources to date indicate that our own-brand product suppliers are effectively managing modern slavery risks in their operations.	Low
Seed	We recognise that the production of cottonseed in India has been associated with a heightened risk of child labour and forced child labour. ¹ Elders only sources cottonseed grown locally by Australian farmers. No high risks of modern slavery were identified in the production of other seed varieties sold by Elders and no instances of modern slavery were identified in respect of our suppliers of seed in the reporting period.	Low
General merchandise	Elders sells a variety of textiles (for example, netting), clothing (including gloves and footwear) and electronics (including pumps and lights), all of which are supplied by Australian companies but some of which may be made in China or other overseas countries. A heightened risk of child labour and forced labour may exist in association with the production of these products in China or overseas. ¹ Suppliers with which whom we have the highest spend in this category have disclosed the following measures utilised by them to manage those risks: policy implementation, employee training and working with third parties to undertake supplier due diligence.	Medium
Killara Feedlot goods and services	All cattle sourced by Killara Feedlot is produced by Australia-based livestock producers. All cattle feed including hay, cottonseed and corn silage is also sourced from Australian producers. Steel, cattle yard equipment and fuel are all sourced from Australia-based suppliers and fuel is purchased locally. Workers at Killara Feedlot are directly employed by Elders, with the exception of professional environmental, veterinary and animal nutrition consultants.	Low

¹ U.S. Department of Labor, 2022, 'List of Goods Produced by Child Labor or Forced Labor', accessed 9 February 2024, <<https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>>.

Products we use

Uniforms, office supplies and IT hardware

Modern slavery risk: Medium

The highest risk products and services procured for use in our operations are:

- IT hardware sourced from Malaysia and China, which are associated with a heightened risk of forced labour and child labour
- Office supplies sourced from China and Indonesia, which are associated with a heightened risk of child labour
- Uniform items sourced from Pakistan and Madagascar, which are associated with a heightened risk of child labour, and Bangladesh, China and India which are associated with a heightened risk of both forced labour and child labour

Suppliers providing goods falling within the above categories to Elders are large, Australian companies operating multinationally, who have been assessed by senior management and have disclosed several measures to manage modern slavery risks, including policy implementation, employee training and working with third parties to undertake supplier due diligence. We conduct regular meetings with our vendors where we discuss our expectations, KPIs and concerns. In the course of dealing with these suppliers in the reporting period, there have been no instances of modern slavery identified.

Actions Addressing Modern Slavery Risks

In line with our ambition to ensure human rights are respected across our operations and supply chains, we take a number of actions to address modern slavery risks, safeguard human rights and promote ethical behaviour throughout our business. The following section outlines our actions to mitigate and address modern slavery risks identified in our operations and supply chains and our planned future developments.

Actions Addressing Risks In Our Operations

One Elders Values

Our One Elders Values set the tone of Elders’ culture from the top, establishing the behaviours we expect from all our employees and our Board. These values, together with our Eight Point Plan (Elders’ FY24 - FY26 organisational strategy), our corporate governance and Resilience and Risk Framework, underpin our key sustainability principle of operating ethically and to the highest standard.

Our Values, enforced through our Code of Conduct, are integral to the way we do business. They embed the behaviours we expect of all our employees and directors. The Board remains engaged with senior management to ensure our values align with what we do in practice. Our One Elders Values are communicated to our people periodically, including annually through our Code of Conduct training.

OUR ELDERS VALUES

				
INTEGRITY Doing the right thing	ACCOUNTABILITY Owning the outcome	TEAMWORK Using the power of the pink shirt team	INNOVATION Embracing new ideas	CUSTOMER Partnering and adding value

Elders' Code of Conduct

Our Code of Conduct¹ details the acceptable standards and the behaviour and responsibilities expected of all our directors, employees, agents, contractors and consultants (“Elders People”). The Code exists to ensure that all Elders People:

- conduct all business safely, fairly, honestly and ethically
- comply with Elders’ policies and procedures as well as all laws, regulations and industry codes
- behave in accordance with the One Elders Values referred to below

Compliance with our Code of Conduct is a condition of employment for all our employees. The Code of Conduct is made available to everyone when they join Elders and is available on our website. All employees are required to read and acknowledge our Code of Conduct annually as part of their ongoing mandatory training.

¹ Available at: <https://elders.com.au/for-investors/governance/>

Elders' Policies and Procedures

We strive to conduct business fairly, honestly and ethically. We maintain transparency and accountability by maintaining policies, procedures and frameworks that educate our people and guide their actions and decisions. The table below outlines some of the human rights, labour rights and ethical sourcing risks and impacts addressed by Elders' policy suite:

Risks		Policies, Procedures and Frameworks
Labour rights	Employment terms, wages, work hours	Code of Conduct Remuneration Policy
Occupational safety	Safe and healthy working conditions	Work Health and Safety Policy
Voice and participation	Freedom of expression, inclusivity and gender equality	Diversity, Equity and Inclusion Policy
Respect in the workplace	Discrimination, harassment and victimisation	Whistleblower Policy Grievance Resolution Policy Discrimination Bullying and Harassment Policy
Responsible sourcing ¹	Bribery and corruption, forced labour, child labour	Anti-Bribery and Corruption Policy Responsible Sourcing Code Ethical Contracting Policy Ethical Contracting Framework

¹ For more information see *Actions Addressing Modern Slavery Risks in Supply Chain*

Training to Identify and Mitigate Risks

We are committed to promoting conduct and behaviour that is honest, fair, legal and ethical and respects the rights of our stakeholders, including clients and customers, suppliers, creditors and employees. We seek to promote a culture of transparency through our key ethical dealing policies, including our Anti-Fraud and Anti-Bribery and Corruption Policies, and employee training on legal and ethical dealing.

We provide annual training on anti-bribery and corruption to all employees. Our internal guidance which details our approach to managing Modern Slavery Risks is available to all employees through our Intranet and covers:

- our obligations under the Modern Slavery Act
- how to recognise risks and incidents of modern slavery
- how to respond to an incident or suspected incident of modern slavery (whether in our operations or upstream or downstream supply chains).

In FY24, all new employees will be required to read and acknowledge the Elders Modern Slavery Guidelines during their onboarding. The guidelines will describe our actions to address modern slavery risks in our operations and supply chains, and will guide new starters on the steps that can be taken to report incidents of modern slavery.

Reporting Grievances and Whistleblower Protection

Elders is committed to providing a workplace where everyone feels safe to raise concerns. If an employee believes they are adversely impacted by a decision, action or behaviour by another party in the workplace, they may choose to resolve the matter through an informal or formal grievance resolution process.

The Elders' Grievance Resolution Policy² articulates the process employees can follow to raise workplace grievances and the principles that apply through the grievance resolution process. We are committed to ensuring that grievances are dealt with as expeditiously as possible whilst maintaining the confidentiality of all parties involved. Through our annual employee survey, 76% of our employees said they felt they could raise concerns outside of their immediate work area and felt they would be taken seriously. In FY23, there were 17 instances of grievances raised and resolved through our formal grievance channels. No concerns were raised in relation to modern slavery.

We encourage all our stakeholders (including our employees, customers and suppliers) to report any actual or suspected unacceptable conduct, including fraud or illegal activity. Our Whistleblower Policy³ identifies internal and external bodies that can be contacted for reporting. The policy requires the Elders Company Secretary and General Counsel to conduct further investigation whilst protecting the anonymity of reporters. All reports are dealt with in accordance with the terms of the Policy, and corrective actions are put in place where necessary.

Our external and independent whistleblower telephone hotline, maintained to facilitate the reporting of unacceptable conduct, is advertised on posters in our work locations. In FY23, we received two reports from whistleblowers through our hotlines. All reports received are investigated, and acted upon, in accordance with our Whistleblower Policy. There were no reports relating to modern slavery from whistleblowers through our hotlines. We recognise that this can be an indicator of effective management of risks, or imply that this form of control is underutilised. We supplement this reporting mechanism with additional controls outlined throughout this report to facilitate multiple opportunities of risk identification.

² An internal document.

³ Available at: <https://elders.com.au/for-investors/governance/>

Protecting Health and Safety

One of the key ambitions under our current Eight Point Plan, supported by our Work Health Safety Management System (“WHSMS”), is to deliver industry leading sustainability outcomes, including across health and safety, for our workers as well as any person (including customers, supplier staff and visitors) attending an Elders worksite. The policies and procedures which underpin our WHSMS apply to all our employees and our contractors, in worksites we control (our branches, warehouses or offices), or do not control (like customer properties or saleyards).

Our WHSMS reflects the requirements of various State-based work, health and safety legislation and our Safety Manual draws on the principles of AS/NZS ISO 45001:2018. Our WHSMS is monitored periodically and evaluated to ensure its suitability and effectiveness.

Elders maintains workers compensation insurance cover for all employees. Trained first aid officers are required to be stationed in every site and we make personal protective equipment, safety guidance materials and relevant and regular training available to all employees as required.

Responses to our annual employee survey demonstrated strong safety sentiment at Elders:

- My work area is safe: 93%
- We practice what we preach - Nothing is so important that it cannot be done safely: 91%

Maintaining Standardised Recruitment and Remuneration Processes

The Remuneration, People and Culture Committee, is responsible for monitoring Elders’ culture and for bringing recommendations to the Board to ensure that Elders’ people and culture policies and procedures align remuneration with shareholder value creation and stakeholder expectations. Management is responsible for providing information about Elders’ culture to the Board and ensuring decisions and conduct are aligned with the One Elders Values.

Our centralised People and Culture and Payroll team manages all recruitment processes, which are required to comply with all applicable laws and regulations relating to fair work, minimum wages and leave entitlements. We maintain strict onboarding, recruitment and payroll procedures including right to work checks, reference checks and police checks.

After a period of consultation with workplace representatives, Elders elected to move from workplace agreements to Modern Awards in FY24. This change is in response to employment law reforms in Australia which will result in any workplace agreement made prior to December 2009 being automatically terminated in December 2023. Elders will ensure that employees continue to benefit under the modern award arrangements and will maintain periodic reviews in line with the national wage standards.

Employees are paid through our centralised Payroll team in accordance with their employment agreements and through fortnightly and monthly pay cycles. Elders pays superannuation for employees at the statutory rate. All employees have access to payslips and timesheets. Contractors are paid on invoice in accordance with agreed payment terms by our centralised Accounts Payable team.

We use the following indicators to periodically review our workplace culture:

- employee engagement survey results
- employment related complaints
- use of employee assistance services related to workplace concerns
- Fair Work claims
- employee turnover and feedback from exit interviews
- performance management cases
- whistleblower reports

Diversity and Inclusion

We recognise that a diverse and inclusive workforce is critical to achieving our objective of attracting, retaining and leveraging talent, and we are committed to providing a workplace that promotes equal opportunity and an environment that is free from all forms of discrimination, including race, colour, national extraction, social origin, age, marital status, family or carer responsibilities, sex or chosen gender, sexual preference, religion and physical ability.

Our Diversity and Inclusion Policy sets out the key elements of a diverse organisation and the value derived from embedding diversity and inclusion throughout our business. Our workforce profile is reported to our Board monthly. In addition, the diversity of our workforce is reported on and reviewed on a quarterly basis by Elders’ Executive team through quarterly business reviews.

Actions Addressing Risks In Our Supply Chains

In line with our ambition to ensure human rights are respected across our business and supply chains, we take a number of actions to address modern slavery risks, safeguard human rights and promote ethical behaviour throughout our business. The activities outlined in this section allow Elders to:

- independently verify the internal risk ratings applied to suppliers and product and service categories
- identify potential or realised modern slavery risks at the individual supplier level and take action accordingly, including engaging with the supplier as required
- identify trends at the industry/sector level that may indicate a heightened risk of modern slavery and proactively engage with suppliers within this industry/sector as required.

Responsible Sourcing Code

Our Responsible Sourcing Code is informed by the International Labour Organisation (ILO) Conventions and the UN Universal Declaration of Human Rights. It sets out the minimum ethical expectations we have of our suppliers, including the specific expectations we have of our suppliers to manage modern slavery risks in their own operations and supply chains. Through our Code, we strongly encourage our suppliers to exceed our expectations where possible.

Our Responsible Sourcing Code is available publicly online to inform our suppliers of our expectations. It will also be provided to all new suppliers during onboarding when our new third-party digital supply chain management platform is live in FY24. The implementation of the Code is monitored through our Ethical Contracting Policy and Framework.

Ethical Contracting Policy and Framework

Our Ethical Contracting Policy and Framework requires Elders people who propose to engage a supplier to first assess and rate that supplier having regard to key risks to our business, including modern slavery and human rights risks. Our Code of Conduct specifically requires compliance with our Ethical Contracting Framework. To determine whether a supplier is exposed to a high risk of modern slavery, our Framework guides our people to consider whether the products they procure:

- are manufactured in a jurisdiction with a high prevalence of modern slavery
- fall within a higher modern slavery risk product category

For suppliers presenting a 'high', 'very high' or 'critical' risk, extended due diligence is required. This involves completion of a due diligence questionnaire which asks whether the supplier has in place documented policies, procedures and controls to manage various ethical risks. Our Ethical Contracting Framework requires our people to consider the responses to the due diligence questionnaire. Where those responses suggest inadequate controls or a risk of modern slavery in relevant supply chains, the Framework directs our people to consider whether it is appropriate for Elders to deal with the supplier.

If a decision to proceed with a supplier relationship is made, then our people are required to ensure adequate internal controls, aligned to our internal Resilience and Risk Framework, are in place. Where appropriate controls appear to exist to mitigate identified risks, Elders will likely proceed to engage that supplier. Where insufficient controls exist, Elders will likely work with suppliers to mitigate those risks. The impossibility of remedial action, or the unwillingness of a supplier to act, will likely result in our inability to work with the supplier. We were not required to terminate any relationships with our suppliers based on the risk of modern slavery in their operations or supply chains in the last financial year.

Our Ethical Contracting Framework is available on our intranet, together with resources to assist our people performing ethical contracting risk assessments (including internal guidance documents on modern slavery product and jurisdictional risks). In FY23, we commenced a review of our Ethical Contracting Framework platform to ensure that it remains adequate for our purposes. Updates to the Framework will be completed in FY24 and communicated to employees as required.

Supplier Screening Platform

We conducted a global reported risk and incident screening of direct suppliers to Elders Rural Services, Titan AG, AIRR and B&W Rural of products sold in FY22. This was not refreshed in FY23 as the Sustainability team and senior management determined that no identified issues necessitated the adjustment of the modern slavery risk ratings outlined in this statement.

We are committed to improving the efficiency and effectiveness of our supplier risk management processes. In FY23, we procured the services of a third-party supply chain management platform, which will enable us to gain deeper visibility into the modern slavery risks associated with our suppliers. Once operational, the platform will allow us to identify the risk exposure of suppliers through issue and risk screening (adverse media screen and human rights issues); conduct extended due diligence through the delivery of self-assessment questionnaires to relevant suppliers; and maintain a centralised database of supplier risk profiles and remedial actions taken by Elders.

The platform will be integrated into business processes in the second half of FY24. We anticipate that the introduction of this platform will help Elders standardise our approach to risk management by:

- increasing our visibility of how suppliers to the Elders group are managing ethical risks through responses to self-assessment questionnaires;
- flagging issues and risks identified in supplier responses for Elders to review; and
- enabling us to collate data and centralise information in a manner that facilitates long-term relationship management according to Elders' risk appetite.

Independent Site Audits

We remain committed to influencing positive change with respect to the production of our own-brand products. Each year, we engage independent auditors, Bureau Veritas, to undertake site audits on key suppliers of our own-brand products. The audits are designed to enable us to better understand the risks present with our suppliers and identify opportunities to drive improvements.

Elders takes a collaborative approach to engaging with suppliers to improve their business practices. We communicate the results of our independent audit with suppliers and provide them with an opportunity to address and remediate the issues identified. These suppliers are also informed of our expectations through our Responsible Sourcing Code.

We completed five site audits in FY23. No incidents of modern slavery were identified, however, instances of employees working long hours without adequate breaks, minor safety hazards and inadequate policy documentation and employee records continued to emerge as prevalent risks amongst suppliers. We are in the process of working with these suppliers to remediate identified issues, including the 14 suppliers who were audited in FY22.

Case Study - Improving practices throughout our supply chain

Elders takes a collaborative approach to engaging with suppliers to improve their business practices. For example, in the course of an independent audit of a supplier of own brand products, a number of issues were identified relating to:

- Long working hours.
- A lack of policies associated with labour practices, including forced labour.
- A lack of training on matters such as non-discrimination, human rights and business ethics generally.
- A lack of processes, procedures and training relating to responsible procurement practices.

Upon providing the audit results to this supplier, the supplier promptly took action to remediate many of the adverse findings and reported this back to us. As an example of the action taken, this supplier:

- Increased staffing to maintain reasonable work hours for all employees.
- Prepared a code of conduct for suppliers, and provided us with a copy.
- Delivered training on topics such as diversity, anti-discrimination and forced labour.
- Prepared a written policy/procedure relating to grievance mechanisms.
- Updated its organisational code of conduct (and provided us a copy for reference) to include policies relating to collective bargaining, freedom of association and forced labour.

A collaborative approach such as this enables Elders to support the improvement of business practices throughout Elders' supply chain, whilst still maintaining a strong and positive relationship with its suppliers.

Supplier Relationship Management

Many of our key suppliers are large, multinational entities which demonstrate actions to address modern slavery risks in their operations and supply chains through public disclosures. These measures include supply chain due diligence procedures, auditing and incident reporting. Relationships with our key suppliers are managed by our people operating in senior leadership positions. We have worked closely with some of our key suppliers for decades, and regularly review our contracts with them to ensure they are up to date and reflect each party's expectations of the other.

We recognise that factors like short lead times may impose stress on suppliers to meet demand, which may increase the risk of downward pressure on workers to work longer hours, or more quickly and increase the risk of exploitation. Where practicable, we provide adequate lead times, long term forecasting and planned orders.

Property managers in our Real Estate Services business engaging workers to clean or maintain properties on behalf of landlords are encouraged to:

- directly engage contractors (limiting the use of subcontractors and as a result, the risk of undetected exploitation)
- engage and pay contractors directly (limiting instances where remuneration is handled by third parties and the risk of underpayment)
- request copies of certificates of relevant insurance coverage

Contractual Obligations

Elders seeks to include in its supplier agreements provisions requiring suppliers to:

- comply strictly, and use reasonable endeavours to ensure that their suppliers comply strictly, with all laws prohibiting the bribery of public officials and private persons, influence peddling, money laundering and modern slavery;
- keep complete and accurate records of any non-compliance and immediately notify Elders of any breach;
- comply with all relevant laws; and
- ensure that products are delivered in a safe manner and in compliance with Chain of Responsibility Laws⁴

Contracts which are not based on Elders' usual terms are required, in accordance with our Delegation of Authority Policy,⁵ and document execution processes to be:

- approved by a member of Elders' Executive;
- reviewed by Elders' Legal team and other relevant functional business areas; and
- executed by two directors of the relevant Elders entity, or a Director and Company Secretary.

We recognise that contractual mechanisms are most effective when accompanied by robust contract management and compliance monitoring. In the coming years, we are investing significantly in the upgrade of our IT systems, which will include the implementation of new systems (including a contract life-cycle management system) to better support our teams.

⁴ The Road Traffic (Vehicles) Act 2012 (WA), the "Heavy Vehicle National Law" set out in the schedule to the Heavy Vehicle National Law Act 2012 (Qld), and laws that are substantively modelled on the "Heavy Vehicle National Law".

⁵ An internal document.

Assessing The Effectiveness Of Our Actions

We are committed to continuously assessing and improving the effectiveness of our actions to identify, mitigate and manage modern slavery risks in our operations and supply chain.

Over the last year, we focused on making improvements to existing processes by:

- Commencing a review of Elders' Human Resource policy suite to maintain ongoing relevance and reliability.
- Procuring a third-party supply chain management platform to centralise data collection and risk management.
- Designing questionnaires that will be circulated to suppliers through the digital platform to track their performance against our recommendations.

Governance

In FY23, our Management Safety and Sustainability Steering Committee met quarterly to discuss actions and progress on key sustainability initiatives, including modern slavery risk.

Our Board Safety and Sustainability Committee is tasked with reviewing our annual modern slavery statement; providing direction to the business on actions to develop our response to the risk of modern slavery; and recommending our modern slavery statement to the Board for approval. Progress on the management of modern slavery risks and our Ethical Contracting Framework, as detailed in this Statement, was reviewed by our Board Safety and Sustainability Committee.

Risk Management and Incident Escalation

Our internal Resilience and Risk Framework details the metrics and assessment criteria used to evaluate risk. Our risk appetite is set by the Board and reviewed annually along with the Resilience and Risk Framework.

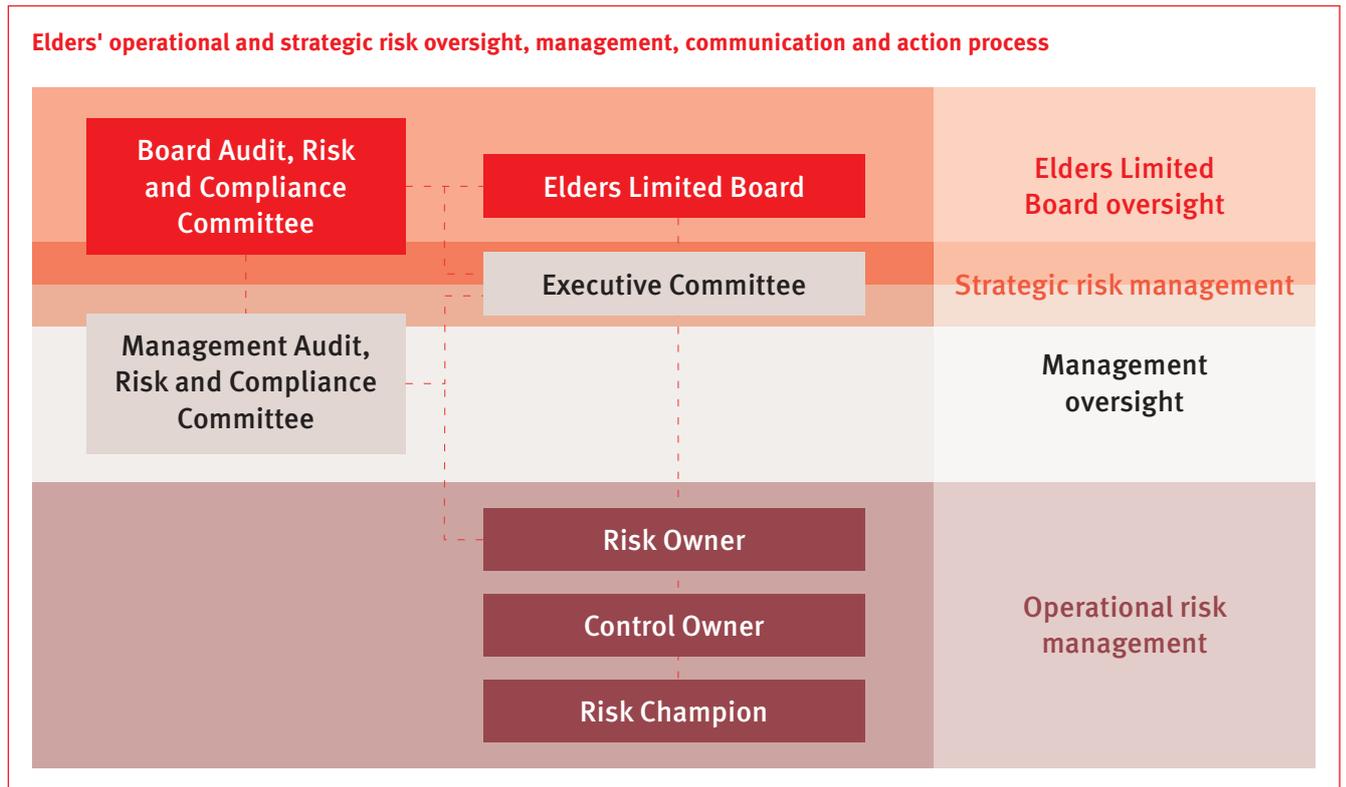
We take a conservative view to risk accepting minimal levels of uncertainty and exposure across the following key areas: safety, reputation, legal, regulatory and compliance, environmental, financial and business disruption. The figure below illustrates the broad oversight of strategic and operational risks and the effective lines of communication between the Board, Executive and Senior Management, and key operational personnel.

The Executive Committee is management's paramount decision-making forum with responsibility for the development, review, implementation, and assessment of all critical business decisions. It considers risk in making all decisions. Our Executive also monitors and reviews the operational and strategic risk registers regularly in the Management Audit, Risk and Compliance Committee for completeness, continued relevance and effectiveness of risk treatment actions, taking into consideration current business conditions.

We review the risks on our enterprise risk register, including those related to modern slavery, to ensure they continue to be addressed appropriately. Our process includes evaluating control effectiveness, identifying new controls or mitigants, and updating treatment plans. The Management Audit, Risk, and Compliance Committee periodically reviews our risk profile and treatment plans, and is notified of risks beyond our established risk appetite. Where a Serious Risk or Incident¹ is identified or occurs, our workers are required to follow our incident escalation process, displayed at all our branches. This involves the following steps:

- a verbal report to a manager within one hour;
- a verbal report to a Safety, Risk and Environment Business Partner;
- reporting the risk or incident online; and
- managers escalating the report through to our Managing Director and CEO within one hour.

¹ Any event that has the potential to significantly impact our employees, clients, business or brand, which includes: safety - fatality or serious injury; animal - significant threat to health/safety/welfare of livestock; environmental - chemical spill, natural disaster, biosecurity threat; business - significant business disruption, delay, likely to cause serious financial impact; media - incident likely to result in significant media attention; criminal - suspected criminal activity or fraud; regulatory - incident that must be reported to authorities (EPA, WorkCover, WorkSafe etc); and other serious incidents.



Modern slavery risks identified in supplier due diligence, site audits or risk and incident screening are considered by our Legal team and/or Sustainability team, who work with senior management to identify any remedial action available to mitigate the risk. We seek to work with suppliers to mitigate any risks of modern slavery identified in their supply chains. Supplier relationships are reviewed when suitable solutions cannot be found to mitigate risks. We were not required to terminate any relationships with our suppliers based on the risk of modern slavery in their operations or supply chains in the last financial year.

Major and severe risks must also be reported to the responsible General Manager, our Company Secretary and the Board in accordance with our Resilience and Risk Framework. No Serious Risks or Incidents, or moderate, major or severe risks relating to modern slavery were reported in FY23.

Stakeholder Engagement

Stakeholder engagement is vital to understanding the impact of our operations and is used to inform and support our Board and broader business in identifying, managing and reporting on material sustainability topics and their associated opportunities and risks, including risks associated with human rights and modern slavery.

Elders' approach to engaging with stakeholders is set out below. Not all methods are utilised annually.

Stakeholder	Engagement approach
Investment Community (including proxy advisors)	Elders' website, AGM, public reporting and announcements, briefings, conferences, regular meetings, discussions and surveys
Regulators	Meetings, site visits, through industry associations and responses to enquiries
Customers	Surveys, meetings, industry events, information sessions, Elders' website and media communications
Communities	Participation in community programs and events, industry events, our website, media communications and surveys
Employees	Surveys, performance reviews, presentations, training, meetings, social events, email and intranet
NGOs	Meetings and through industry associations
Financiers	Regular meetings, discussions and surveys
Industry bodies	Industry conferences, meetings and presentations
Contractors and Suppliers	Meetings, supplier conferences and surveys

Consultation With Our Subsidiaries

Elders' Sustainability team coordinated a process across our corporate group whereby key personnel from each of our reporting entities were consulted in the drafting of Elders' Modern Slavery Statement. Our Statement was reviewed by the Board Safety and Sustainability Committee and the Management Safety and Sustainability Steering Committee and endorsed by the Board.

We will continue to improve our efforts to identify and mitigate modern slavery risks at Elders over the coming years. We will continue to measure and report on our performance through our annual Modern Slavery Statement.



Mark Allison
Managing Director
and Chief
Executive Officer



Appendix

Appendix

Compliance with Modern Slavery Act requirements

This statement was prepared in accordance with the criteria set out in the Australian Modern Slavery Act. The table below provides an outline of where these mandatory criteria are addressed within the report.

Mandatory criteria for Modern Slavery Statements	Section
Identify the reporting entity	Our Modern Slavery Statement
Describe the structure, operations, and supply chains of the reporting entity	Our Structure and Operations Our Business
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Risk Assessment
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Actions Addressing Modern Slavery Risks
Describe how the reporting entity assesses the effectiveness of such actions	Assessing The Effectiveness Of Our Actions
Describe the process of consultation with any entities that the reporting entity owns or controls	Consultation With Our Subsidiaries
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Our Modern Slavery Statement