

Modern Slavery Policy

This Modern Slavery Policy sets out Vickery Bros Pty Ltd's (Vickery Bros) commitment to enforce the intent of the Modern Slavery Act 2018 (Cth) by taking steps to limit the risk of modern slavery occurring within its own business and supply chain.

1. Background

Modern slavery can occur almost anywhere, affecting people of any age, gender, or background within homes, workplaces, and in rural or urban areas. It is prevalent in various industries, including but not limited to the agricultural and logistics sectors within which Vickery Bros operates. Modern slavery is often hidden within the complex global supply chains that produce the goods and services acquired by Vickery Bros.

The global drivers of modern slavery include poverty, displacement, gender inequality, lack of economic opportunity, lack of access to education and weak rule of law.

Modern slavery includes, but is not limited to, human trafficking, slavery and slavery-like practices such as forced labour, forced marriage, servitude, debt bondage and deceptive recruiting. Modern slavery also includes the worst forms of child labour.

2. Objectives

Vickery Bros is committed to:

- 1.1. Leadership at all levels that is demonstrated through actions, accountability and commitment to the promotion of a zero tolerance for modern slavery;
- 1.2. Compliance with modern slavery laws, both domestically and internationally as required;
- 1.3. Promoting an awareness of modern slavery and human rights to our employees and suppliers;
- 1.4. Continuous improvement of modern slavery data collection and reporting systems to ensure they effectively capture emerging risks;
- 1.5. Working with suppliers and employees ensure that modern slavery risks are identified and mitigated;
- 1.6. Embracing innovation and technologies wherever reasonably practicable to identify, monitor and mitigate against modern slavery;
- 1.7. Equipping our people with information, training and resources to empower them to identify and mitigate modern slavery risks; and
- 1.8. Fostering work relationships in order to integrate modern slavery mitigation into work processes wherever possible.

3. Definitions

| Term | Meaning |
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| Child Labour | While not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development. Example: A child may be forced into hazardous work such as loading heavy cargoes under pressure to find money for their survival and that of their family. |
| Deceptive Recruiting | Occurs when a person uses tricks or lies to recruit someone for a job involving exploitation. |
| Debt Bondage | Occurs when someone is forced to work to repay an excessive debt that they might never be able to pay off. The debt may be real or not. |
| Employee | <p>A person employed under a contract of employment or contract of training as defined in the OHS Act¹.</p> <p>The term Employee as used in this policy also taken to mean those persons included under the definition of 'Worker' under the WHS Act², being a person who carries out work in any capacity for Vickery Bros, and includes working as:</p> <ul style="list-style-type: none"> • an employee; • a contractor or subcontractor; • an employee of a contractor or subcontractor • an employee of a labour hire company who has been assigned to work in the person's business or undertaking; • an outworker; • an apprentice or trainee • a student gaining work experience • a volunteer; or • a person of a prescribed class. |
| Forced Labour | Occurs where coercion such as manipulation, control or violence, threats or lies are used to make someone feel they cannot stop working or leave their place of work. |
| Forced Marriage | Occurs when a person is made to get married without their free and full consent. This means they did not agree to the marriage by their own choice. No child under 16 can legally agree to a marriage. |

¹ Section 5 of the *Occupational Health and Safety Act* 2004 (Vic)

² Section 7 of the *Work Health and Safety Act* 2012 (SA)

| Term | Meaning |
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| Human Rights | <p>Include (but are not limited to):</p> <ul style="list-style-type: none"> the absolute right to freedom from slavery and forced labour (Article 8 ICCPR); the absolute right to freedom from torture and other cruel, inhuman or degrading treatment or punishment (Article 7 ICCPR, Articles 1, 2, 3, 13, 14, 15, 16 UNCAT); the right to work and rights at work (Article 6 and 7 IECSCR); the right to protection from exploitation, violence and abuse (Article 20 ICCPR, Article 19 CRC, Article 16 CRPD); the right to freedom of movement (Article 12 and 13 ICCPR); and the right to privacy and reputation (Article 17 ICCPR). |
| Human Rights Instruments | <p>Are rights conferred under the following (not exhaustive) list of instruments:</p> <ul style="list-style-type: none"> International Covenant on Civil and Political Rights (ICCPR); Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (UNCAT), International Covenant on Economic Social and Cultural Rights (ICESCR), Convention on the Rights of the Child (CRC); Convention on the Rights of Persons with Disabilities (CRPD); International Bill of Human Rights; and 1998 International Labour Organisation's Declaration on Fundamental principles and Rights at Work. |
| Human Trafficking | <p>Occurs when a person uses coercion such as manipulation, control or violence, threats or lies to move someone across or within borders so they can be exploited, which includes (but not limited to):</p> <ul style="list-style-type: none"> Forced labour Prostitution Other sexual exploitation Slavery (or similar) Servitude etc. Organ harvesting. |
| Modern Slavery | <p>Is conduct that would constitute:</p> <ul style="list-style-type: none"> an offence under Division 270 or 271 of the Criminal Code; or an offence under either of those Divisions if the conduct took place in Australia; or trafficking in persons, as defined in Article 3 of the <i>Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime</i>, done at New York on 15 November 2000 ([2005] ATS 27); or the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the <i>Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour</i>, done at Geneva on 17 June 1999 ([2007] ATS 38). |

| Term | Meaning |
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| Modern Slavery Statement | Statement to be given annually to the relevant Australian Government Minister describing the risks of modern slavery in the operations and supply chains of reporting entities and entities owned or controlled by those entities. |
| Reporting Entity | The <i>Modern Slavery Act</i> 2018 (Cth) reporting requirements apply to Australian commercial and not-for-profit entities with an annual consolidated revenue of at least AU\$100 million ³ , or such other criteria as may be legislated from time to time. |
| Servitude | Occurs when a person uses coercion such as manipulation, control or violence, threats or lies so that a person feels they cannot stop working or leave their place of work. It also involves denying other personal freedoms. |
| Slavery | Occurs when a person treats someone like property that can be used, bought, sold or traded. |
| The Act | The term used in this policy to refer to the <i>Modern Slavery Act</i> 2018 (Cth) as amended. |

4. Scope

This policy applies to all Vickery Bros' directors, officers, employees and suppliers.

5. Duties, Obligations and Responsibilities

Vickery Bros acknowledges that it will be required to prepare and provide a Modern Slavery Statement to the Minister (see also paragraph 6 below).

| Role | Responsibilities |
|--------------------------------|--|
| Directors | Overall responsibility for this policy and its compliance with all legal and ethical obligations. |
| General Manager | Day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that effective controls are in place to ensure operational efficacy. |
| Corporate Legal Counsel | Annual reviews of the policy to ensure consistency with legislative requirements and operational changes. Corporate Legal Counsel will provide regular reporting to the Directors in respect to any breaches of this |

³ Section 5 of the *Modern Slavery Act* 2018 (Cth)

| Role | Responsibilities |
|------------------------|---|
| | policy, any extant or emerging modern slavery risk and what Vickery Bros is doing to address any identified risks. |
| Senior Managers | The General Manager, WHS Manager, Operations Manager and Workshop Manager are responsible for ensuring that those reporting to them understand this policy are given adequate and regular training on it and the issue of modern slavery. |
| Employee | While at work, an Employee must follow this policy to the extent that it affects their day-to-day work and reporting requirements. Employees are expected to report any suspicion that modern slavery might be occurring in any part of Vickery Bros’ business or supply chains. See also <i>Whistleblower Policy</i> |
| Suppliers | Are required to take all reasonable efforts to ensure they, and organisations in their supply chain, are not causing, contributing to or directly linked to human rights abuses such as modern slavery, including but not limited to human trafficking, slavery, forced labour, forced marriage, servitude, debt bondage, deceptive recruiting and the worst forms of child labour. This includes undertaking risk assessments to identify the risk of human rights breaches, particularly in vulnerable industries, and educating their Employees and suppliers accordingly. |

6. Assessing and Mitigating Risk

Vickery Bros intends to take the following actions to assess and address risks:

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| Assess and prioritise risks | Supply chain mapping, risk assessments and high-risk identification |
| Address identified risks | Implement or update policies and procedures, incorporate modern slavery clauses into contracts with suppliers, supplier code of conduct, conduct due diligence (including pre-screening processes) and anonymous modern slavery reporting avenues for Employees and others. |
| Engage and collaborate | Encourage positive change and collaboration with suppliers, engage with stakeholders in the modern slavery eradication space for exposure to best practices and innovative solutions. |
| Review and report | Continuously evaluate of the effectiveness of actions taken, updating of policies and procedures as required and annual reporting. |
| Educate | Training of employees on how to identify modern slavery and report. |

7. Modern Slavery Statement

Subject to Vickery Bros meeting the reporting threshold of the Act⁴ in any given reporting period, the Act requires Vickery Bros to submit an annual Modern Slavery Statement to identify and address the following mandatory criteria⁵:

- (a) Identification Vickery Bros as a Reporting Entity.
- (b) A description of Vickery Bros' structure, operations and supply chains.
- (c) A description of the risks of modern slavery practices in Vickery Bros' operations and supply chains, and any entities that Vickery Bros' owns or controls; and
- (d) The actions taken by Vickery Bros and any entity that Vickery Bros owns or controls, to assess and address those risks, including due diligence and remediation processes.
- (e) How Vickery Bros assesses the effectiveness of such actions; and
- (f) The consultation process with:
 - (i) any entities that the reporting entity owns or controls; and
 - (ii) in the case of a reporting entity covered by a statement under section 14 of the Act—the entity giving the statement; and
- (g) Any other information that Vickery Bros considers relevant

Managing Director will sign Modern Slavery Statements as the 'responsible member' for the purposes of the Act⁶. This policy will be used to inform our Modern Slavery Statement which will be provided to the relevant Australian Government Minister for publication annually.

8. Issue resolution

If an issue is identified with a supplier, we will work with them in a timely manner to plan and resolve all issues. Vickery Bros reserves the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

If any part of this policy is unclear, clarification should be sought from Vickery Bros' Corporate Legal Counsel.

9. Review

This policy is to be reviewed every 12 months or earlier if:

- There is an identified risk to Vickery Bros or an entity within the supply chain;
- A significant or unplanned event occurs;
- Incident investigation or audit results demonstrate that this policy is failing to deliver the required outcomes;
- There are changes in associated legislation; or
- There is evidence that the policy is not having a positive impact on Modern Slavery related KPIs.

⁴ Section 5 of the *Modern Slavery Act 2018* (Cth)

⁵ Section 16 of the *Modern Slavery Act 2018* (Cth)

⁶ Section 13(2)(d) of the *Modern Slavery Act 2018* (Cth)

10. Associated Policies

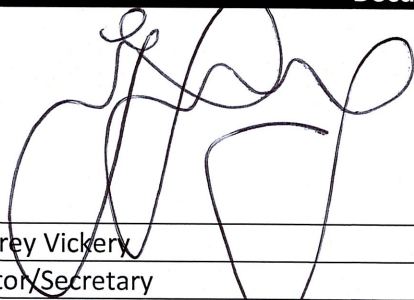
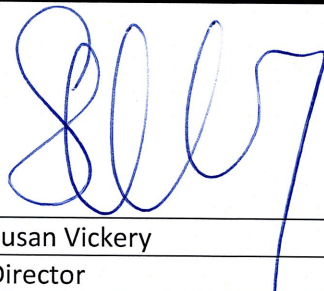
- Employee Code of Conduct
- Modern Slavery Supplier Code of Conduct
- Whistleblower Protection Policy

11. References

As they relate to the subject of this policy:

- *Modern Slavery Act 2018 (Cth)*
- *Criminal Code Act 1995 (Cth)*
- *Crimes Act 1914 (Cth)*
- *Fair Work Act 2009 (Cth)*
- *Migration Act 1958 (Cth)*
- *Charter of Human Rights and Responsibilities Act 2006 (Vic)*
- *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children;*
- *ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour*
- *Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework*

| Vickery-Bros-POL-004 Modern Slavery Policy | | |
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| Document Control | | |
| Version | Version Adoption | Date |
| 1.0 | Draft – W Tanner, WHS Manager | 27/10/2025 |
| 1.0 | C Tosetti, General Manager | 27/11/2025 |
| 1.0 | G Vickery, S Vickery, Directors | 8/12/2025 |

| Document Control Approval | |
|---|---|
|  Geoffrey Vickery Director/Secretary |  Susan Vickery Director |

