

## Modern Slavery Policy

IMS

Quality Manual 4.5, 7.1.6, 7.5

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### 1. OVERVIEW

KELLY Tillage Pty Ltd ("KELLY Tillage" or "the Company") is dedicated to conducting its business as a responsible global entity that honours human rights and firmly rejects all forms of modern slavery and human trafficking.

### 2. PURPOSE

This Modern Slavery Policy demonstrates our pledge to eradicate modern slavery in all our operations and supply chains.

### 3. SCOPE

It is applicable to all our employees, contractors, suppliers, and business partners, both within Australia and on a global scale.

### 4. POLICY STATEMENT

Modern Slavery includes a variety of exploitative practices such as, but not limited to, slavery, servitude, forced labour, child labour, debt bondage, human trafficking, and any other activities that infringe upon human rights and dignity.

### 5. POLICY COMMITMENT

KELLY Tillage is opposed to all forms of Modern Slavery and exploitation and is committed to respecting human rights across its operations and supply chains. We take a proactive, proportionate approach to risk identification and will promptly investigate any allegation or concern as outlined below.

KELLY Tillage is committed to:

a) Principles:

5.1. *Compliance:*

We will comply with all relevant international, national, and local laws and regulations regarding Modern Slavery and human trafficking.

5.2. *Risk Assessment:*

We are developing a structured approach to assess Modern Slavery risks across our operations and supply chains. As our processes and systems mature, we intend to undertake regular risk assessments to identify and mitigate potential risks.

5.3. *Training and Awareness:*

We are in the process of developing training and awareness programs to support employees in identifying and reporting Modern Slavery risks.

5.4. *Business Partner Engagement:*

We will engage with our business partners and suppliers, as appropriate, to communicate our expectations regarding Modern Slavery and support alignment with this Policy over time.

5.5. *Reporting Mechanism:*

We support a Whistleblower Protection framework, allowing employees and stakeholders to report any concerns related to Modern Slavery within our organisation or supply chains without fear of retribution.

b) Responsibilities

5.6. *Management:*

The ESG Manager of KELLY Tillage has the responsibility to implement, enforce, and continuously improve this Modern Slavery Policy.

5.7. *Employees:*

All employees must familiarise themselves with this policy and report any potential instances of Modern Slavery via the established reporting mechanism.

c) Supply Chain Management

5.8. *Supplier Due Diligence:*

We will perform due diligence on our suppliers and business partners as appropriate, to ensure their compliance with this Modern Slavery Policy.

5.9. *Contracts:*

Contracts will be updated to include appropriate clauses to enforce adherence to this policy and compliance with relevant laws.

d) Monitoring and Review

5.10. *Monitoring:*

We will manage Modern Slavery risks proportionate to our size and current capacity. We will consider enhanced monitoring measures as our resources and business scale permit.

5.11. *External Verification:*

External verification is not currently undertaken, having regard to the size of the Company and our assessed low-risk profile. We will consider whether external verification is appropriate as our business grows.

5.12. *Policy Review:*

This policy will be reviewed annually to maintain its effectiveness and relevance.

e) Communication

5.13 *Stakeholders:*

This Modern Slavery Policy will be communicated to all stakeholders, including employees, suppliers, customers, and investors, as determined by the Managing Director.

f) Non-Compliance

5.14 *Reporting:*

We encourage the reporting of any non-compliance with this policy by employees, suppliers, and business partners via the Whistleblower Policy and Procedure.

5.15 *Investigation:*

All reported cases of non-compliance will be investigated promptly, with appropriate corrective actions taken in accordance with the Whistleblower Policy and Procedure

5.16 *Termination:*

Non-compliance may lead to the termination of business relationships with those found to be engaged in Modern Slavery practices.

## 6. CONCLUSION

KELLY Tillage is committed to preventing Modern Slavery across its operations and supply chains. While we have assessed our Modern Slavery risk as low, this Policy reflects our genuine opposition to all forms of exploitation and our expectation that those we work with share that commitment. We aim to conduct ourselves as a responsible global business that stands against Modern Slavery, contributing positively to the broader society.

## 7. RELATED POLICIES AND PROCEDURES

- KEDOC312 Modern Slavery Business Case (Reference Only)
- KEDOC315 Modern Slavery Decision Tree
- KEPO153 Whistleblower Policy
- KEPR151 Whistleblower Procedure

SIGNED:



Calvin Stead  
Managing Director

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