

	BioMar Pty Ltd.		Ver: 001
	Policy		Issue Date: 19/3/24
	Title	Modern Slavery	Ref: HR-PS-006

1 PURPOSE

The aims of this policy are to:

- (a) ensure that those covered understand their obligations and do not engage in breaches of BioMar policies and procedures and the law;
- (b) provide a framework for respecting and promoting human rights and as an essential commitment to living the BioMar purpose;
- (c) provide broad principles to uphold human rights and compliance with universal human rights principles so that BioMar's labour-related rights meet or exceed legally applicable standards – not to provide specific answers to unique legal questions;
- (d) reflect BioMar's zero tolerance to modern slavery and trafficking;
- (e) Demonstrates BioMar's commitment to making every effort to eradicate modern slavery and trafficking from the BioMar business and supply chain;
- (f) ensure that employees behave appropriately and in line with the BioMar values of respect, courage, innovation, execution, and openness;
- (g) recognise that those covered are ultimately responsible for their own behaviour; and
- (h) operate with the law, the BioMar Group Modern Slavery Policy Statement, and other BioMar policies and procedures.

2 SCOPE

This policy covers and applies to people at our workplace in relation to:

- (a) behaviour at the workplace;
- (b) the performance of work or provision of services for or in connection with BioMar; and
- (c) conduct outside the workplace or working hours if the acts or omissions:

- (i) are likely to cause serious damage to working or professional relationships at BioMar;
- (ii) are incompatible with an employee or contractor's duty to BioMar, or employment relationship or engagement; or
- (iii) damage or are likely to damage BioMar's interests or reputation.

3 RESPONSIBILITIES

BioMar Directors must communicate and implement this policy within their area of responsibility.

Managers and Supervisors are required to promote and champion this policy within their area of responsibility and take steps to ensure that any potential breaches of this policy are taken seriously and acted upon immediately and appropriately.

All employees are required to:

- (a) comply with this policy as a lawful and reasonable direction;
- (b) not directly or indirectly engage in, aid, or encourage behaviour in breach of this policy;
- (c) meet their duty of care obligations;
- (d) be accountable for their own safety and the safety of others at BioMar;
- (e) utilise the Grievance Procedure if they reasonably suspect that someone at BioMar has breached, or are in breach of, this policy.

However, complaints which are vexatious, false, frivolous, or otherwise not made in good faith or with a reasonable basis against another person will not constitute a breach of this policy.

4 PRINCIPLES

The BioMar Global Modern Slavery Policy Statement commits to upholding human rights and complying with universal human rights principles as stated in the:

- (a) United Nations Universal Declaration of Human Rights;
- (b) United Nations Rights of the Child;
- (c) Conventions of the International Labour Organisation (ILO);
- (d) Ethical Trading Initiative, and;

- (e) Conventions of the World Health Organisation.

BioMar expects BioMar suppliers to commit likewise, at the same time as making employees aware of their labour-related rights. All human beings should be met with dignity and respect.

BioMar is committed to making every effort to eradicate modern slavery and human trafficking from the BioMar business and supply chain. Modern slavery and human trafficking are of growing concern in both Australia and globally, and BioMar recognise that it is on a journey to improve due diligence processes at BioMar and the supply chain, locally. BioMar are actively working on developing methods to monitor effectiveness in this area, targeting measured continuous improvement.

5 BIOMAR FACTS

5.1 The reporting entity

BioMar Pty Ltd ABN 52 619 617 248 (BioMar).

5.2 Structure, operations and supply chains

(a) BioMar is fully owned by Danish conglomerate Schouw & Co. Founded in 1878. Schouw & Co. is listed on the Copenhagen Stock Exchange and makes long term investments in leading businesses. It's subsidiary portfolio businesses employ more than 4,500 employees worldwide. Approximately 70 employees are within its Australian business.

(b) BioMar is a leader in the production of high-performance diets for more than 45 different fish and shrimp species and has a long-term commitment to developing the aquaculture industry in a responsible and sustainable way.

BioMar's focus is supporting customers delivering healthy, great tasting seafood. BioMar does this by innovating efficient, safe and nutritious feed for aquaculture with minimal environmental impact. The BioMar local agility and execution focus ensure that BioMar meet individual customer needs.

BioMar (Australia), based in Wesley Vale, Tasmania was established in 2019 and works to the highest standards recognised through the achievement and retention of the following quality standards:

- (i) ISO 9001 - Quality
- (ii) ISO 14001 - Environmental
- (iii) ISO 22000 – Food safety

- (iv) GLOBALG.A.P;
- (v) BAP;
- (vi) Feedsafe

5.3 Risks of modern slavery practices in operations and supply chains

- (a) BioMar supply chains include the sourcing of raw materials globally and we therefore recognise that there are countries and companies that are at a higher risk of modern slavery and trafficking than others, particularly, but not exclusively, in the production and transportation of raw materials.

Due diligence

- (b) The supplier due diligence process involves the completion of a supplier approval process comprising our current Code of Conduct and supplier approval questionnaire which suppliers need to sign and return as acceptance that their business practices are aligned to BioMar standards. Suppliers are also asked to provide their own policies on modern slavery, Code of Conduct, and sustainability and environmental information. Depending on the questionnaire response from suppliers, and an associated risk assessment, a physical audit may be performed.

Remediation

- (c) BioMar has zero tolerance toward slavery and human trafficking and are working towards ensuring that everyone in the supply chain complies with this. A supplier who fails to provide BioMar with the appropriate information in a timely manner may no longer be able to supply BioMar.

Effectiveness of actions

- (d) BioMar conducts an annualised audit program that incorporates an assessment of compliance with all elements of this policy.

6 CODE OF LABOUR PRACTICE

In Australia, and in line with the Global Modern Slavery Policy, BioMar follow the Ethical Trading Initiative (ETI) Base Code, which is founded on the conventions of the ILO.

6.1 Employment if freely chosen

- (a) There is no forced, bonded or involuntary prison labour;

- (b) Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

6.2 Freedom of association and the right to collective bargaining are respected

- (a) Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively;
- (b) BioMar adopts an open attitude towards the activities of trade unions and their organisational activities;
- (c) Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace;
- (d) Where the right to freedom of association and collective bargaining is restricted under law, BioMar facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

6.3 Working conditions are safe and hygienic

- (a) A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment;
- (b) Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers;
- (c) Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided;
- (d) Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers;
- (e) The company observing the code shall assign responsibility for health and safety to a senior management representative.

6.4 Child labour shall not be used

- (a) There shall be no new recruitment of child labour;
- (b) BioMar shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until

no longer a child; "child" and "child labour";

- (c) Children and young persons under 18 shall not be employed at night or in hazardous conditions;
- (d) These policies and procedures shall conform to the provisions of the relevant ILO standards.

6.5 Living wages are paid

- (a) Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher; In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- (b) All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid;
- (c) Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6.6 Working hours are not excessive

- (a) Working hours comply with national laws and benchmark industry standards, whichever affords greater protection;
- (b) In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average.
- (c) Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

6.7 No discrimination is practised

- (a) There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

6.8 Regular employment is provided

- (a) To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice;
- (b) Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

6.9 No harsh or inhumane treatment is allowed

- (a) Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

This policy is made pursuant to section 54 (1) and section 16 of the Modern Slavery Act 2018.

This policy may be varied, terminated, or replaced by BioMar in its sole discretion.