



MODERN SLAVERY POLICY

Cobram Estate Olives Limited

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1 POLICY STATEMENT

- 1.1 Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, including:

Slavery	Exercising powers of ownership over a person.
Servitude	The obligation to provide services is imposed by the use of coercion.
Forced or compulsory labour	Work or services are not undertaken voluntarily and are exacted from a person under the menace of threat or punishment.
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation, including for example, through deceptive recruitment or coercion.
Bonded labour or debt bondage	Work or services are demanded for repayment of a debt, often where the debt and the duration of the services may not have been defined.

- 1.2 The above range of rights abuses affect both adults and children and all have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

- 1.3 It is important to understand that there is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim, namely:

1.3.1 the person is not in possession of their own passport, identification or travel documents;

1.3.2 the person is acting as though they are being instructed or coached by someone else;

1.3.3 they allow others to speak for them when spoken to directly;

1.3.4 they are dropped off and collected from work;

1.3.5 the person is withdrawn or they appear frightened;

1.3.6 the person does not seem to be able to contact friends or family freely; or

1.3.7 the person has limited social interaction or contact with people outside their immediate environment.

- 1.4 This list is not exhaustive. It is an example only. Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it. Refer to the Compliance section below for further detail.

- 1.5 Cobram Estate Olives Limited ACN 115 131 667 and its subsidiaries (**Cobram Estate**) is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.
- 1.6 Cobram Estate is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains. Cobram Estate expects the same high standards from all of its contractors, suppliers and other business partners.
- 1.7 This policy applies to all persons working for Cobram Estate or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.8 This policy does not form part of an employee's contract of employment and Cobram Estate may amend it any time.

2 RESPONSIBILITY FOR THE POLICY

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with Cobram Estate's legal and ethical obligations, and that all those under our control comply with it. The board of directors is also responsible for approving Cobram Estate 's annual modern slavery statement.
- 2.2 The Human Resources Manager, Kate Carey (the **Modern Slavery Officer**), will have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. The Modern Slavery Officer's responsibilities extend to:
- 2.2.1 monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in Cobram Estate's operations, including in its subsidiary organisations;
 - 2.2.2 monitoring and consulting with the suppliers, contractors and business partners of Cobram Estate to identify risks of modern slavery practices in our supply chains;
 - 2.2.3 developing measures to assess and address any risks of modern slavery practices, including through due diligence in Cobram Estate's contractual relations;
 - 2.2.4 monitoring the effectiveness of those measures;
 - 2.2.5 developing appropriate training materials and programs for Cobram Estate's employees to comply with this policy; and
 - 2.2.6 preparing Cobram Estate's annual modern slavery statement in accordance with our disclosure obligations under Australian modern slavery legislation.
- 2.3 Management at all levels will:
- 2.3.1 listen and be approachable to others within Cobram Estate's business;
 - 2.3.2 respond appropriately if they are told something that might indicate an exploitative situation;

- 2.3.3 remain alert to indicators of modern slavery;
 - 2.3.4 use their experience and professional judgment to gauge situations; and
 - 2.3.5 ensure those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains, including any areas of Cobram Estate's business and supply chains which are identified as at risk of modern slavery practices.
- 2.4 All those working for Cobram Estate (or under its control) have responsibilities under this policy regardless of the level of seniority - refer to the Compliance section below for further detail. You are also invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Modern Slavery Officer.

3 COMPLIANCE WITH THE POLICY

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of Cobram Estate's business or supply chains is the responsibility of all those working for Cobram Estate or under its control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of Cobram Estate's business or supply chains of any supplier tier at the earliest possible stage.
- 3.4 You can raise your concern by speaking with the Modern Slavery Officer, or alternatively, you can raise your concern in accordance with Cobram Estate's Whistleblower Policy available at <https://www.cobramestateolives.com.au/>. Reports may be made on an anonymous basis.
- 3.5 The Modern Slavery Officer is also available to answer any questions you might have in respect of the operation of this policy.
- 3.6 Cobram Estate aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Cobram Estate is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of Cobram Estate's business or in any of its supply chains. Cobram Estate's Whistleblower Policy explains in further detail the protections that are available to anyone who raises a concern under that policy.

4 COMMUNICATION, AWARENESS AND MONITORING OF THIS POLICY

- 4.1 Cobram Estate will provide regular training to all of its employees on this policy. This will include training on how to identify modern slavery practices and the particular parts of Cobram Estate's business and supply chains which are subject to a greater risk of modern slavery practices. This training will also form part of the induction process for all individuals who work for Cobram Estate, whether as an employee or contractor.

- 4.2 Cobram Estate's commitment to addressing the issue of modern slavery in its business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with Cobram Estate and reinforced as appropriate thereafter.
- 4.3 Cobram Estate will review this policy regularly, at least annually. Cobram Estate will provide information and/or training on any changes that may be made.

5 BREACHES OF THIS POLICY

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 Cobram Estate may terminate its relationship with other individuals and organisation working on its behalf if they breach this policy.

6 ADOPTION

- 6.1 The Board adopted this Policy on 9 August 2021 and it takes effect from that date.