

MODERN SLAVERY POLICY

Objectives

Landpower Group and its related entities (as defined below) (collectively referred to as “**Landpower**”) are committed to limiting the risk of modern slavery occurring within its own business, in its supply chains or through any other business relationship.

Modern slavery can take many forms. Fundamentally, modern slavery is a range of exploitive practices including human trafficking, slavery, forced labour and child labour all of which involve the deprivation of a person's liberty by another in order to exploit that person for personal or commercial gain.

As part of its commitment to limiting the risk of modern slavery, Landpower will comply with applicable Australian, New Zealand and International slavery legislation including the *Modern Slavery Act 2018* (Cth) and state-based legislation, which may be applicable from time to time.

This policy underpins Landpower's Modern Slavery Statement which was prepared in accordance with applicable modern slavery legislation.

Scope

The related entities in the Landpower Group are:

- Harvest Centre Holdings Pty Limited
- Harvest Centre New Zealand Limited
- Landpower Australia Pty Limited
- Landpower Management Services Limited
- Landpower New Zealand Limited

This policy applies to all persons working for and on behalf of Landpower in any capacity, including employees and officers (collectively referred to as “**Workplace Participants**”).

This policy also applies to all persons and entities who have, or seek to have, a business supplier relationship with Landpower (collectively referred to as “**Suppliers**”). Landpower expects all suppliers to familiarise themselves with this policy and to act in a way that is consistent with its values.

Policy

Landpower has a zero-tolerance approach to all forms of modern slavery within its business and within its supply chains.

Landpower is committed to acting ethically and with integrity in all its business dealings and relationships.

Landpower is committed to implementing and enforcing effective systems and controls to best ensure that modern slavery is not taking place in its own business or any of its supply chains.

Actions

As part of Landpower's approach, the business will use its best endeavours to ensure that its programmes are designed to detect and prevent modern slavery practices within its supply chains, including:

1. Ensuring communication of this policy to all Workplace Participants, the Group's business partners and Landpower's supply chains;
2. Assessing modern slavery and human trafficking risks within Landpower and its supply chains and developing effective, efficient and transparent controls to reduce exposure to those risks;
3. Ensuring anti-slavery wording is inserted into contracts of employment and procurement contracts;
4. Implementing appropriate due diligence processes prior to engaging business partners, agents, contractors, consultants, sub-contractors and suppliers within Landpower's supply chains;
5. Engaging business partners, agents, contractors, consultants, sub-contractors and suppliers within its supply chain who have also implemented procedures which incorporate the principles under the applicable modern slavery legislation;
6. Providing training to all Workplace Participants to ensure compliance with this policy and enable all Workplace Participants to recognise modern slavery practices and take steps to avoid the same;
7. Preparing and providing modern slavery statements where required which meet the requirements under section 16 of the *Modern Slavery Act 2018* (Cth) and any state-based legislation; and
8. Implementing continual review mechanisms to ensure that Landpower remains vigilant to modern slavery risks.

Landpower also relies on the following policies to assist in managing the risks of modern slavery:

- Employee Code of Conduct
- Employee Code of Ethics
- Procurement Policy
- Whistleblower Policy

Reporting

Workplace Participants are required to be proactive and promptly report any suspected violation of this policy, without delay, to any of the following persons at the Group:

- a. their manager
- b. their manager's manager
- c. any General Manager
- d. the Chief Executive Officer

The report should be made on a 'one-up' basis, i.e. to the immediate line manager of the Workplace Participant making the report. However, if the Workplace Participant is not confident about disclosing to this person, a disclosure may be made to anyone in the list above.

If the Workplace Participant is not confident making their report to any person listed above, they may also provide their report to the Group Chairman through the Group's Whistleblower Reporting Service.

Suppliers are encouraged to report any suspected violation of this policy without delay to their main point of contact or through the Whistleblower Reporting Service.

The Whistleblower Reporting Service is available via the Company Website. If the person wishes, the service provides the ability to make the report anonymously.

Complaints will be kept confidential and will be dealt with appropriately.

Communication and Awareness

Landpower will endeavour to provide annual training on this policy (and as otherwise necessary). We will also endeavour to communicate the risk of modern slavery occurring within our supply chains.

Breaches of this Policy

Landpower considers a breach of this policy to be a serious matter.

Any employee who breaches this policy by engaging in or conspiring to engage in any modern slavery conduct will face disciplinary action, up to and including termination of employment.

Landpower may terminate its relationship with other contractors and consultants or individuals and organisations working on its behalf, or engaged by it within its supply chain, if they breach this policy.

Protections

A person who believes on reasonable grounds that Landpower has engaged in, or plans to engage in, modern slavery and reports the conduct in accordance with this Policy is protected from detrimental action or threats to cause detriment for reporting the conduct.

To protect the people from detrimental acts or omissions, an employee who has subjected the person to detrimental action will be subject to disciplinary action.