MODERN SLAVERY POLICY

Purpose

Giltrap AgriZone is committed to treating all people with dignity, fairness, and respect. We do not tolerate modern slavery, human trafficking, forced labour, child labour, or any form of worker exploitation in our business or supply chain. We expect the same standards from our employees, contractors, suppliers, labour providers, recruitment agencies, and business partners.

Scope

This policy applies to all employees, directors, officers, contractors, consultants, temporary staff, labour hire workers, and anyone acting on behalf of Giltrap AgriZone.

What is Modern Slavery?

Modern slavery occurs when a person's freedom, rights, or ability to make choices about their work and living conditions has been significantly restricted for another person's benefit. Examples include:

- Human trafficking
- Forced labour
- Worker exploitation
- Child labour
- Deceptive recruitment practices
- Debt bondage

Identifying Modern Slavery Risks

Modern slavery can sometimes be difficult to recognise. Warning signs may include:

- Workers appearing fearful, isolated, or unable to speak freely.
- Workers not having access to their own passport, visa, or identity documents.
- Excessive working hours, poor living conditions, or unclear employment arrangements.
- Recruitment fees being charged to workers.
- Labour or services being offered at unusually low rates.
- Contractors or suppliers unwilling to provide employment records or information.

Employees should speak up if they see anything that may indicate worker exploitation or unethical labour practices.

Our Commitment

Giltrap AgriZone is committed to:

- Complying with all applicable employment, immigration, human rights, and health and safety laws.
- Taking reasonable steps to prevent modern slavery in our business and supply chain.
- Investigating concerns raised in good faith.
- Supporting workers who raise concerns.
- Working with reputable suppliers, contractors, recruitment agencies, and labour providers.

- Periodically reviewing modern slavery risks and taking reasonable steps to address identified risks.
- Checking and holding the Modern Slavery policies of our major supplies (>5% of dollar purchases).

Responsibilities

All employees are expected to:

- Comply with this policy.
- Be alert to signs of worker exploitation.
- Raise concerns if they suspect modern slavery or unethical labour practices.
- Cooperate with any investigation.

Managers are also responsible for promoting awareness of this policy, supporting a workplace free from exploitation, and escalating concerns to HR or senior management.

Suppliers & Contractors

Giltrap AgriZone expects suppliers, contractors, recruitment agencies, and labour providers to comply with applicable employment, immigration, and human rights laws. The Company may request evidence of compliance and may take further action, including ending a business relationship, where serious concerns are identified. Giltrap AgriZone will not knowingly engage labour providers that charge recruitment fees to workers or retain workers' personal documents

Raising a Concern

Anyone who becomes aware of, or suspects, modern slavery or worker exploitation should report the matter to their Manager, HR, a Senior Manager, or the Managing Director as soon as possible. Reports may be made verbally or in writing. Employees who raise concerns in good faith will be treated fairly and protected from retaliation.

Where appropriate, concerns may be referred to relevant authorities including New Zealand Police, Employment New Zealand, Immigration New Zealand, WorkSafe New Zealand, or other regulatory bodies.

Non-Compliance

Failure to comply with this policy may result in disciplinary action. Contractors, suppliers, or service providers involved in modern slavery practices may have their engagement reviewed or terminated.

Review

This policy will be reviewed every two years or sooner if required.

Policy Approval

Owner: Human Resources

Approved By: Managing Director

Effective Date: Nov 2026

Next Review Date: Nov 2028