

MODERN SLAVERY

Article 4 of 4

Modern Slavery Compliance

Large Agribusinesses at or Approaching the \$100M Threshold

Meeting the Standard, Not Just the Minimum

If your agribusiness has annual consolidated revenue of \$100 million or more, you are already a reporting entity under the Modern Slavery Act 2018 (Cth). That means you are required to prepare and lodge an annual Modern Slavery Statement.

However, there is an important distinction to be made.

Lodging a statement and lodging a credible statement are not the same thing.

Regulatory attention is now shifting toward the quality of reporting. The Anti-Slavery Commissioner has made it clear that organisations providing superficial or generic disclosures are likely to face closer scrutiny. With civil penalties under consideration and expectations continuing to rise, this is no longer just a compliance exercise, it is a governance and risk issue.

This article focuses on what a **genuinely effective modern slavery compliance programme** looks like for large agribusinesses, and where many are still falling short.

The Mandatory Reporting Criteria – What They Mean in Practice

Your Modern Slavery Statement must address all seven criteria specified in the Act. Statements that address them superficially or with boilerplate language are increasingly being identified as inadequate. Here is what each criterion requires in practice for an agribusiness:

Criterion	What It Requires in Practice for Agribusinesses
1. Identity of the entity	Full legal name, ABN, and the structure of your corporate group if applicable.
2. Structure, operations and supply chains	A genuine description of your farming operations, processing facilities, sales channels, and the full supply chain from inputs to end buyer. Not a generic industry description.
3. Risks in operations and supply chains	Specific identification of modern slavery risks, not generic statements. For ag businesses: labour hire arrangements, seasonal and migrant workforce, PALM scheme workers, piece-rate arrangements, offshore input sourcing.
4. Actions taken to address risks	Concrete actions, not aspirations. Policies implemented, supplier agreements updated, audits conducted, training delivered, grievance mechanisms established.
5. Effectiveness of actions	A genuine assessment of whether actions are working, not just a list of what you did. Metrics, incidents identified, grievance mechanism usage, worker survey results.
6. Consultation with related entities	If you are part of a corporate group, evidence of consultation with other entities covered by the statement.
7. Other relevant information	Any other relevant information i.e. grievance outcomes, remediation actions taken, future commitments with timelines.

Where Large Agribusinesses Commonly Fall Short

Across the sector, the same issues tend to appear again and again in modern slavery statements.

One of the most common is overly vague supply chain descriptions. Broad statements about sourcing from “a range of suppliers” do not provide meaningful insight. A credible statement should reflect the key inputs, geographies, and types of labour involved across the business.

Similarly, risk identification is often too general and simply acknowledging that agriculture is a higher-risk sector does not meet the requirement. The expectation is that businesses identify the specific risks within their own operations, whether that relates to labour hire arrangements, seasonal workforce pressures, PALM scheme participation, or offshore sourcing.

There is often also a gap between intention and action.

Statements that describe what a business “plans to do” are not sufficient. The focus should be on what has already been implemented i.e. policies introduced, contracts updated, audits undertaken, and training delivered during the reporting period.

Perhaps the most consistent weakness is in assessing effectiveness. Many statements list activities but stop short of evaluating whether those activities are making a difference. Without reference to data, such as grievance reports, worker feedback, audit findings, or WHS indicators it is difficult to demonstrate that risks are being meaningfully managed.

Building A Compliance Program That Actually Holds Up

A strong modern slavery response is not built from isolated actions. It is a system, and it needs to operate consistently across the business.

1. Governance And Accountability

Responsibility for modern slavery compliance should sit with a clearly identified senior leader, with regular visibility at board level. This ensures the issue is treated as part of core business risk, rather than a once-a-year reporting task.

2. Supply Chain Visibility and Risk Assessment

Large agribusinesses should maintain a structured view of their supply chain, including:

- Direct suppliers and labour hire providers.
- Offshore sourcing of inputs such as seed, chemicals, packaging, and equipment.

- Processing, logistics, and transport contractors.
- Key export pathways and associated buyer expectations.

Each of these areas should be assessed for risk based on the nature of the work, the workforce involved, and any known compliance history. This assessment should be reviewed and updated regularly, not treated as a static document.

3. Contractual Controls

Supplier agreements should reflect your expectations. This includes clear obligations around modern slavery compliance, notification requirements if issues arise, and the ability to verify or audit supplier practices. These provisions are particularly important when dealing with labour hire providers and high-risk supply chains, where visibility is otherwise limited.

Worker-Facing Practices: Where Compliance Becomes Real

For large agribusinesses, a significant portion of modern slavery risk sits within the workforce itself.

- This means compliance needs to be visible at ground level.
- Workers should understand their rights and have access to clear, accessible pathways to raise concerns.
- Grievance mechanisms need to be actively communicated and trusted, not buried in onboarding material.
- Where accommodation, transport, or other deductions are involved, these arrangements need to be transparent, voluntary, and compliant with Award requirements.
- Piece-rate systems should be regularly reviewed to ensure they are delivering lawful outcomes in practice, not just in theory.

Importantly, labour hire workers should have the same ability to raise concerns as direct employees. Without this, a critical part of the workforce remains effectively invisible.

Using WHS Systems as a Source of Insight

For many large agribusinesses, there is already a mature WHS management system in place. What is often overlooked is how valuable that system can be in identifying modern slavery risks.

The connection is straightforward. Workers who feel unsafe, pressured, or dependent are less likely to report injuries, raise concerns, or participate openly in safety processes.

As a result, unusually low incident reporting or a lack of meaningful engagement in high-risk environments can be a signal worth exploring, not just from a safety perspective, but as a potential indicator of workforce vulnerability.

Integrating WHS data into your modern slavery framework strengthens both. It provides a more reliable basis for assessing effectiveness and gives leadership a clearer, combined view of workforce conditions across the business.

Verification & Independent Oversight

At this scale, relying solely on internal assessments is rarely sufficient.

A credible program should include some form of independent verification. This may involve external audits, targeted reviews of higher-risk operations, or structured worker engagement processes conducted independently of line management.

Importantly, the value of this process lies in what it uncovers. A record of identifying and addressing issues is generally more credible than consistently “clean” results, which can indicate that reviews are not probing deeply enough.

Remediation: Responding When Issues Are Identified

One of the most important, but often underdeveloped areas of compliance is remediation.

Identifying an issue is not, in itself, a failure. The real test is how the business responds and a structured response should address:

- How affected workers will be identified and supported.
- How any underpayments or other impacts will be rectified.
- How the supplier relationship will be managed.
- How the issue will be documented and disclosed.

Handled properly, remediation demonstrates that the system is working as intended. Increasingly, both regulators and commercial partners recognise this as a sign of genuine compliance.

Preparing For Stronger Enforcement

The regulatory direction is clear. Expectations are increasing, and the shift is **moving from reporting toward demonstrated due diligence and accountability**.

Proposed reforms include the introduction of civil penalties, more prescriptive due diligence requirements, and greater transparency around non-compliant businesses. There is also ongoing discussion about heightened obligations for high-risk sectors, including agriculture. For large agribusinesses, the practical implication is that the current environment is a transition period. Businesses that build robust, functioning systems now will be far better positioned as enforcement strengthens.

A Practical Check Before Lodging Your Statement

Before finalising your Modern Slavery Statement, it is worth stepping back and asking a simple question: **Does this reflect how the business actually operates?**

A well-prepared statement should:

- Describe your real operations and supply chains.
- Identify risks that are specific to your business.
- Set out actions that have already been taken.
- Demonstrate some form of measurement or evaluation.
- Acknowledge where issues have been identified and how they were addressed.
- Be reviewed and supported at a senior leadership level.

If those elements are not clearly present, it is likely that further work is required before lodging.

Completing The Series

This article concludes AtOne AGRI's four-part series on modern slavery compliance across the agricultural sector.

While the obligations differ depending on business size, the underlying theme is consistent. Expectations are increasing, visibility is improving, and the consequences of inaction are becoming more material.

For larger operations, the focus is no longer on whether to act, but on **how well the system is working in practice**.

Final Thoughts

How AtOne AGRI Can Support You

Modern slavery compliance does not need to be overwhelming, but it does need to reflect how your business actually operates. AtOne AGRI works with farming businesses to build practical, farm-ready systems that bring together HR, WHS, Contractor Management, and Modern Slavery compliance into a single, consistent approach.

We can help you:

- Assessing workforce and supply chain risks.
- Strengthening labour hire and contractor arrangements.
- Establishing simple reporting and grievance processes.
- Integrating WHS and compliance systems.
- Preparing for buyer or audit requirements.

Book a free consultation to discuss your compliance risks.
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