

# Contents

(1)	Joint Reporting	3	(6) Modern Slavery Risks in Operations	
(2)	CEO Message	4	and Supply Chains	
(3)	Our Commitment	5	(7) Actions Taken to Assess and Address the Risks	20
(4) (5)	About our Group and Our Values Structure, Operations and Supply Chains	6	(8) Modern Slavery Audits	23
ζ-,	(i) Structure	7	(9) Assessing the effectiveness of	25
	(ii) Operations	8	actions taken	
	(iii) Business Unit Profiles	9	(10) External Collaboration	26
	(iv) Stakeholders and Management Responsibility	12	(11) Activities Planned for 2025	27
	(v) Modern Slavery Steering Committee	13	(12) Mandatory Criteria Reporting Matrix	28
	(vi) Supply Chain	14	(13) Reporting Entities	29
	(vii) Policies and Procedures	15	(14) Execution	30
	(viii) Training and Communications	16	(14) Excedent	
	(ix) Strategy & Approach	18		





This joint modern slavery statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) ("the Act") by Baybrick Pty Ltd (ACN 067 220 0170) ("the Company") on behalf of itself and other related entities that are reporting entities for the financial year from 1 January 2024 to 29 December 2024. All of these reporting entities under this statement are listed on page 29. In order to prepare this joint statement, the Company consulted with each of the reporting entities covered by this statement.

The Company and all of the reporting entities under this statement are referred to in this statement as "the Group" or "JBS Australia".

# **CEO** Message

# JBS Australia continues to be at the forefront of animal protein food manufacturing that reaches tables across Australia and the world.

The journey of our products from farm to fork comprises a vast network of suppliers and partners. It is a journey we are committed to ensuring is ethically sound, transparent, and respectful of human rights.

As a leading company in the food industry, we acknowledge our responsibility to ensure the integrity of our products and the welfare of those who bring these products to life. Navigating through the complexities of the global supply chain is imperative and we remain vigilant and proactive in addressing the serious issue of modern slavery.

Our Modern Slavery Statement outlines the steps we are taking to assess and manage risks related to modern slavery in our operations and supply chain. It reflects our ongoing efforts to implement rigorous due diligence processes, enhance supplier engagement and compliance, and foster a culture of ethical business conduct across all levels of our organisation.

This document outlines our comprehensive approach to identifying, preventing, and addressing any instances of modern slavery within our sphere of influence, as well as meeting the intent of the Australian Modern Slavery Act 2018 (Cth).

Our strategic approach encompasses organisational awareness, risk assessments, supply chain mapping, community engagement, remedial action and supplier contingency planning and is underpinned by supply chain transparency, risk assessments and due diligence, training and awareness and collaboration and advocacy.



As a further commitment to modern slavery risk management and manging human rights issues in our supply chain, we launched several initiatives and controls that were approved by senior management. These initiatives include, the launch and implementation of a Global Human Rights Policy, a Third Party Ethics & Compliance Due Diligence Policy and a General Ethics & Compliance Acknowledgment to make our expectations clear to high risk suppliers. 2024 also saw the SEDEX platform being further integrated into the risk management of modern slavery and the commitment of SMETA Pillar 4 Audits at all of our processing sites. We also continued to partner with Fair Supply to conduct detailed due diligence on suppliers to better understand and address the risks in our supply chain.

Our Modern Slavery Statement is a living document that will continue to evolve as we learn, grow, and adapt to the ever-changing landscape of global business and human rights challenges. It is a testament to our belief that business must be a force for good, contributing to a world where dignity, freedom, and justice are rights afforded to all.

I invite you to read our statement in full and join us in this critical journey towards more ethical and sustainable business practices.

#### **Brent Eastwood**

CEO JBS Australia



### **Our Commitment**

The Group opposes all forms of slavery and forced labour in its operations and the operations of its suppliers.

We are committed to improving our practices to combat modern slavery as we will continue our critical work of feeding the world.

### **Our Mission**

To be the best in what we do, completely focused on our business, ensuring the best products and services to our customers, a relationship of trust with our suppliers, profitability for our shareholders and the opportunity of a better future for all of our team members.

#### **Our Beliefs**

- Focus on the details
- A hands-on approach
- Success is only achieved through hard work
- The right people in the right place
- Passion for what we do
- Actions and behaviour are more important than knowledge
- A leader must win over their team members
- Lead by example
- Focus on results
- Working with people who are better than us
- Believing makes the difference
- Quality products



### **About JBS Australia**

Our Group is Australia's largest meat and food processor with a strong portfolio of leading beef, lamb, pork and fish products together with a range of smallgoods and value-added branded products.

The Group is a major supplier of animal protein to Australia, New Zealand and the world, providing strong local employment, career opportunities and export dollars for the Australian economy.

We source products, services and inputs from Australia and around the world to support our food production business.





## Structure

The Group is comprised of private companies controlled or majority owned by JBS S.A., a company incorporated and listed in Brazil.

The Group includes:

- Andrews Meat Industries Pty Ltd
- Australian Consolidated Food Holdings Pty Ltd
- Baybrick Pty Ltd
- Diamond Valley Pork Pty Ltd
- Huon Aquaculture Group Pty Ltd
- Huon Aquaculture Company Pty Ltd
- Industry Park Pty Ltd
- JBS Aquaculture Pty Ltd
- JBS Australia Pty Ltd

- JBS Australia Finance Pty Ltd
- JBS Australia Finance 1 Pty Ltd
- Premier Beehive Holdco Pty Ltd
- Primo Foods Pty Ltd
- Rivalea (Australia) Pty Ltd
- Rivalea Holdings Pty Ltd
- S&C Australia Holdco Pty Ltd
- S&C Australia Investments Pty Ltd
- Seven Point Pork Pty Ltd
- White Stripe Foods Pty Ltd

The main activities of the Group take place in Australia and New Zealand where the Group employs approximately 15,000 team members with a diverse range of skills.









### **Business Unit Profiles**

### JBS Australia Northern

The company's Northern Division operates five strategically placed processing facilities as well as five feedlots across Queensland and New South Wales with access to an extensive network of quality cattle. The Northern Division services both domestic and international markets, exporting ~85% of its finished goods or commodity products to more than 50 countries around the world.



### Geographies:

Australia



Facilities:

5



Feedlots:

5



Team members:

5.000+

### **JBS Australia Southern**

The company's Southern Division produces a range of high-quality beef and lamb products through five beef and lamb processing facilities and one feedlot located across New South Wales, Victoria, Tasmania and South Australia. Its value-added business, which produces a variety of retail ready products in a range of formats, is tailored to individual customer requirements.



### Geographies:

Australia



Facilities:



Feedlots:



Team members:

3,300+

### **Business Unit Profiles Cont.**

### **JBS Pork Australia**

JBS Australia supplies Australians with high quality pork, including value-added pork products. In 2021, the business expanded its operations into the breeding, growing, fattening, and finishing of pigs through its acquisition of Rivalea, a leading vertically integrated pork producer and processor with operations in both New South Wales and Victoria. The Pork Division comprises Diamond Valley Pork, Seven Point Pork & Rivalea.



# **Geographies:**Australia



Facilities:



Piggeries:



Team members: 1.400+

### **Primo Foods**

Primo Foods is Australia's most significant manufacturer of ham, bacon, salami, and deli meats, supplying quality smallgoods to major retail and food service groups across Australia. Primo is unique for owning and operating manufacturing plants, packing facilities and distribution warehouses, allowing it to maintain uncompromising levels of quality control.



**Geographies:** Australia and New Zealand



Facilities:



Team members: 2.800+

## **Huon Aquaculture**

Based in Tasmania, Huon Aquaculture is a significant contributor to Australia's Atlantic Salmon production. Huon Aquaculture is a leader in the Tasmanian marine farming industry with a focus on high-quality products and innovative aquaculture practices.



### Geographies:

Australia



Facilities (including nurseries and hatcheries):

10



**Team members:** 

1.100+

### **Andrews Meat Industries**

Andrews Meat Industries (AMI) is one of Australia's longest serving and most respected suppliers of protein-based solutions across three key divisions: foodservice, value added (cooked), and export. Andrews is a leader in portion control and value-added meats for the food service industry, currently producing ready-to-serve meals and sous vide meat options for major retail stores and food service clients under the Creative Food Solutions brand.



### Geographies:

Australia



Facilities:



**Team members:** 

340+















### **Business Unit Profiles Cont.**

### D.R. Johnston

As JBS Australia's domestic wholesale division, D.R. Johnston's core business is distributing fresh and frozen carton meat to butcher shops, independent supermarkets, and food service Australia wide. It also operates retail outlets.



**Geographies:**Australia



Facilities:



**Team members:** 90+

### **Swift**

Swift and Company Trade Group comprising the Meat and By-Products units is the international trading division of JBS Australia which has, for over 50 years, been supplying international markets with meat products and protein by-products from a range of species, domestic and global suppliers.



**Geographies:**Australia



Facilities:



Team members: 35+

### White Stripe Foods

White Stripe Foods has a long-standing history of supplying quality centre of the plate cuisine to leading hotels, restaurants, food service distributors, retailers, caterers, manufacturers, and butchers across the globe. White Stripe Foods supplies high-quality beef, lamb, yeal and seafood programs.



**Geographies:**Australia



Facilities: 1

# Team me

**Team members: 25+** 

### Knox International

Established in 1984, Knox International has grown to become one of the leading processors and exporters of Australian sheep and lamb skins. Knox works closely with the JBS Australia plants located in Victoria and South Australia as well as other third-party suppliers.



**Geographies:**Australia



Facilities:



Team members: 25+

### **JBS Carriers**

The transportation division of JBS, Carriers supports operations through an efficient logistical structure that transports cattle, shipping containers, bulk products in tippers, and palletized refrigerated products. Its fleet includes 42 prime movers and more than 100 trailers that travel a combined 7 million km per year.



**Geographies:**Australia



Transportation Terminals:



**Team members:** 65+

### **Premier Beehive**

Based in New Zealand's Wairarapa region and part of Primo Foods, Premier Beehive manufacturers high quality bacon, ham and smallgoods for local consumers, supplied through retail and foodservice groups. Premier Beehive has a reputation for high quality products including the market leading Beehive Streaky bacon.



**Geographies:** New Zealand



Facilities: 2



Team members: 300+















## **Stakeholders**



# **Management Responsibility**





# Modern Slavery Steering Committee

In 2024, the Modern Slavery
Steering Committee comprised of
a representative from each
Business Units and vital functions
in Australia such as the inclusion of
the Group Talent Acquisition
Manager and the PALM
Coordinator.

Some of the issues that were presented and discussed at this forum included:

- The Modern Slavery Statement and how to reflect the Group's efforts in relation to managing modern slavery risks.
- Results from the Risk Assessment conducted on our supply chain in conjunction with Fair Supply.
- Reports on PALM workers and the NSW Modern Slavery Commissioner's Inquiry.
- Trends in relation to modern slavery that may impact the Group.







## **Supply Chain**

# The Group's supply chain has an extensive domestic and international footprint. Suppliers to the Group are diverse.

#### Examples include:

- Farmers and operators of feedlots
- Suppliers of meat and by-products
- Suppliers of grain and animal feed
- Suppliers of fishmeal and fish feed
- Suppliers of spices and flavourings
- Suppliers of chemicals
- Domestic and international suppliers of land and maritime transportation and logistics services
- Service providers provide us with:
  - Recruiting and labour solutions, including labour sourced under the Pacific Australia Labour Mobility (PALM) program both directly as JBS team members and indirectly via labour hire providers.
  - Cleaning, security, maintenance, waste disposal and construction
  - Engineering, IT, marketing, health and other professional support services
  - Cold storage

The majority of suppliers in the Group's direct supply chain (by spend) are incorporated in Australia or New Zealand or have operations in the region.

On occasion, services (for example, IT, logistics and recruitment) are delivered offshore. Some products such as packaging, production equipment, ICT hardware and pork is to varying degrees sourced overseas.

The Group engages with suppliers through different forms of contracts, ranging from one-off, short-term contracts to long term umbrella arrangements.

### **Policies & Procedures**

In 2024, as part of the drive for continuous improvement, we reviewed our core compliance policies and procedures



### Supplier Code of Conduct

JBS suppliers are required to:

- Comply with the United Nations
   Principles on Business and Human
   Rights and the 10 principles of the
   United Nations Global Compact
- Comply with core International Labour Organization (ILO) conventions

The document is publicly available <u>here</u>.



#### Global Code of Conduct and Ethics

- JBS forbids the use of child or forced labour
- Ethics Line, a grievance and complaints mechanism available 24/7 for whistleblowing and other complaints, with the option of making such complaints anonymously

The document is publicly available <u>here</u>.



### \*Updated\*-Whistleblower Policy

- An eligible whistleblower's rights are set out in this policy.
- Ethics Line campaign rolled out at all sites to ensure awareness of this grievance mechanism.

The document is publicly available <u>here</u>.



### \*New\* - Global Human Rights Policy

- Alignment with the principles covered in the UN International Bill of Human Rights and International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- Commitment to periodically assessing business practices and evaluating alignment to internationally recognised human rights to avoid adverse impacts on individuals.

The document is publicly available <u>here</u>.



# \*New\*-General Ethics & Compliance Acknowledgment

- Strict and express requirement for all suppliers to comply with laws and regulations in relation to responsible sourcing and modern slavery and ensuring this extends to their suppliers.
- Requirement to immediately notify us in any case of non-compliance with these requirements.



### \*New\* - Third Party Ethics & Compliance Due Diligence Policy

- Incorporates modern slavery and human rights due diligence to ensure modern slavery risks are identified, assessed and addressed prior to engaging a third party.
- Screening requirements and red flags are listed in this policy.



## **Communications and Training**

In 2024, improvements were made to training and communications on modern slavery. This capacity building initiative was with the purpose of improving awareness and understanding of modern slavery and the need for us to conduct due diligence in this space.

### Ethics & Compliance Training

Business Units have received in person Ethics & Compliance training tailored specifically to the Business Unit's risk profile and operations. These sessions covered the need to undertake human rights due diligence with screening as a minimum first step for international suppliers. Broader compliance matters were combined with modern slavery to ensure that due diligence and third party screening included modern slavery risks.

### Ethics & Compliance Quiz

In October 2024, an inter-Business Unit competition was created to raise awareness of 3 broad themes. 2 of these themes were:

- Ethics Line See something; say something!
- Let's Fight Modern Slavery (see next page for the slide that was displayed at all sites in Australia and New Zealand).

The Business Unit with the most team members with correct answers to all 5 questions was crowned champion.

# Specialised Training for Procurement and Purchasing

- The focus of these two sessions was primarily to ensure that Procurement and Purchasing were aware of modern slavery risks in their respective areas and were able to identify heightened risks.
- The session included an explanation of the integration of the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor into the process for assessing when enhanced due diligence on a supplier should be conducted.



### **Communications and Training**

As mentioned on the page before, this poster below was part of Ethics & Compliance Month organised by the Ethics & Compliance team, which concluded with an inter-Business Unit quiz. For one month, it was displayed on TV screens at all sites in Australia and New Zealand at lunch rooms, foyers, etc.

# Let's Fight Modern Slavery



JOIN THE COMPETITION!

#### **Ethics & Compliance Quiz**

The Business Unit with the most team members with correct answers to all 5 questions will be crowned champion. (closes 30 Nov) In Australia, for every detected victim of modern slavery, four go undetected\*. Exploitation at work may be hidden and can lead to modern slavery. Anyone can report any suspected modern slavery via Ethics Line. Modern slavery includes forced labour, debt bondage, human trafficking and other slavery-like practices.

Some indicators of modern slavery include:

- Passport taken away
- Paying recruitment costs in your home country or taking out a loan to pay your agent
- Underpayment or no payment
- · Not free to leave work

This message is part of Ethics & Compliance Month organised by the Ethics & Compliance team, which will conclude with an inter-Business Unit quiz. Which Business Unit will be crowned champion in the Ethics & Compliance Business Unit Quiz 2024?



<sup>\*</sup>This statistic is based on a study conducted by the Australian Institute of Criminology

# Strategy & Approach

JBS Modern Slavery Strategy and Road Map 2023 – 2025.

In 2022, the Group developed its JBS Modern Slavery Strategy and Road Map 2023 – 2025. This has since been refined in 2024 but the general tenets of the strategy and approach continue to apply.

The Group has been using the strategy to guide activities to build sustainable structures and processes to reduce the modern slavery risks in operations and in the supply chain.

#### Organisational Community **Awareness** Engagement JBS Australia team members JBS Australia works with are made aware of modern stakeholders in the slavery risks in the workplace community groups to fight and supply chain via training against modern slavery. Community and communications. Engagement 200 Remedial Action Organisational JBS Australia uses its **Awareness** Remedial leverage as a customer to Action ensure action against Managing slavery in the operations of suppliers. Modern Risk Assessments and Slavery Due Diligence **Risks** Proactively, screening checks prior to onboarding are 6 conducted on all international 000o **Supplier Contingency** and high risk domestic suppliers Risk **Planning** using LSEG's World Check and Supplier Assessment Media Check systems. We also JBS Australia identifies Contingency alternative critical suppliers to partner with Fair Supply to Planning be mobilised if unacceptable conduct a detailed annual (VEY) modern slavery practices are retrospective risk assessment identified in current large on more than 1,500 suppliers. Supply Chain suppliers. Mapping

Supply Chain Mapping

supply chain.

JBS Australia works with suppliers to map modern slavery risks in the



# Modern Slavery risks in operations and supply chains

In 2024, the Group followed up on modern slavery risks identified during the previous reporting period in 2023. As part of these efforts, enhanced due diligence activities were conducted on high-risk suppliers identified by Fair Supply.

Several modern slavery risks that were identified in the previous reporting period required further assessment and monitoring. In addition, new modern slavery risk areas were identified.

Modern slavery risk areas that required detailed risk assessments were:

- Tomato Products
- Uniform Standardisation Project
- Cleaning, Waste Disposal, Labour Hire
- PALM Scheme
- Recruitment Agents
- Netting and Roping





### Actions taken to address and assess the risks

### Ingredients - Tomato Products

- This matter was reported in the last Modern Slavery Statement where we explained that certain tomato product derivatives were identified as being from a high risk tier-2 supplier based in China. As also previously mentioned, the Group engaged the Australianbased tier -1 supplier to address the potential risk of modern slavery.
- Further verification was undertaken, including assessing the tier-2 supplier's SMETA Audit Report. In Q4 2023, a related entity of the tier-2 supplier was added to the *Uyghur Forced Labor* Prevention Act Entity List.
- Notwithstanding assurances provided by the tier-1 supplier, concerns remained. As a result, action was taken to remove the ingredient altogether after testing revealed that its removal did not make a significant impact on taste or aesthetics.
- Given the widespread and well documented risks regarding tomato production in Xinjiang, China, a further risk assessment was conducted to assess the exposure to tomato products elsewhere in the Group. Tomato products used elsewhere in the Group have been confirmed as being 100% produced and sourced in Australia, thereby reducing the modern slavery risk.
- This case demonstrates the Group's commitment to managing modern slavery risks in its supply chain and taking action where necessary.

### **Uniform Standardisation Project**

- In 2024, Human Resources worked with Procurement to lead a uniform standardisation project for the supply of dustcoats, butchers shirts, maintenance uniforms and other personal protective equipment (PPE) for approximately 12,500 workers.
- The Group reviewed 8 potential suppliers and as part of the selection process conducted enhanced due diligence on each potential supplier. This included screening via our third party screening platform, reviewing material available on SEDEX and assessing specific geographical risks based on the country where each supplier manufactured the goods.
- 3 of the 8 potential suppliers were not able to demonstrate membership on SEDEX or an equivalent platform. None of these suppliers were selected to provide the Group with uniforms.
- Given the labour-intensive nature of the business and the significance of uniform procurement and the risks presented in textile industries across the world, Procurement continues to work closely with Ethics & Compliance to manage these risks.





### Actions taken to address and assess the risks Cont.

# Cleaning, Waste Disposal and Labour Hire

- Several suppliers of services continued to be engaged both as part of SMETA Audits and independently to ensure compliance with legal, regulatory and other requirements.
- Cleaning, waste disposal and labour hire were identified as higher risk suppliers of services and received a greater level of engagement proportionate to their risk profile.
- Labour Hire Supply Agreements were amended to include robust modern slavery controls and the Legal team continue to work on strengthening the contractual controls on other suppliers of services.

# Pacific Australia Labour Mobility (PALM) Scheme

- The Group continues to take compliance with PALM requirements seriously to ensure that all applicable laws and regulations are complied with.
- In 2024, the Group began to facilitate reengagements of PALM workers disengaged with other employers for a variety of reasons.
- To reduce recruitment costs for workers, the Group covers expenses such as visa fees, medical clearances, and police clearances required prior to mobilisation. We also actively monitor charges in participating countries to ensure no costs are unfairly passed on to workers. The offshore component of the program is managed by the PALM Labour Mobility Support Program (PLMSP) and the Department of Foreign Affairs and Trade (DFAT).
- In 2024, the Group's PALM Coordinator was added to the Modern Slavery Steering Committee to ensure that the PALM Scheme continues to be assessed and considered in the context of modern slavery risks.

### **Recruitment Agents**

- Ethics & Compliance worked closely with the Talent Acquisition team to review several potential recruitment companies and review existing partners.
- This included mapping out the entire supply chain and speaking with recruitment companies and assessing their partners and agents involved as well as the level of controls they had on them.
- As part of these controls in action, after enhanced due diligence and engagement, there were two potential recruitment companies that the Group decided not to proceed with due to modern slavery risks and concerns raised.
- In addition, Legal worked to ensure that robust modern slavery clauses were included in contracts with recruitment agents.
- The Group Manager Talent Acquisition was added to the Modern Slavery Steering Committee to ensure that the Group's recruitment activities continue to be assessed and considered in the context of modern slavery risks.





### Actions taken to address and assess the risks Cont.

### Roping and Netting

A new trend was identified in our Risk Assessment conducted together with Fair Supply. Netting and roping suppliers for the Group, based in India, Vietnam and Taiwan were identified as the Group's suppliers most at risk of modern slavery exposure. While the risks of modern slavery in India and Vietnam have been well documented – and continue to be monitored closely – we also note that, shortly after the end of the reporting period in February 2025, reports have been released on modern slavery risks involving migrant workers in the textile industry in Taiwan.

This risk is managed with each of the 5 rope and netting suppliers via:

- signing our updated General Ethics & Compliance Acknowledgment to remind suppliers of their obligations in relation to responsible sourcing onsite visits to the factories of the suppliers in these countries on an annual basis; and
- onsite visits of factories in each location to ensure standards are complied with and there is no signs of modern slavery on the ground.





### **Modern Slavery Audits**

#### **SEDEX and SMETA Audits**

In 2024, SMETA (Sedex Members Ethical Trade Audit) audits were conducted at the majority of the Group's sites. To drive further consistency across the Group, the Group also committed to ensuring that all processing facilities will be subject to SMETA Pillar 4 Audits.

The SMETA standard is designed to be aligned with the Ethical Trading Initiative (ETI) Base Code, and covers human rights, modern slavery, labour standards, business ethics, health and safety and environmental practices. The SMETA audits that were conducted during the reporting period provided valuable opportunities to continue to improve each site's labour practices.

The Group also consolidated its social and ethical audits on SEDEX. Rather than focusing on understanding the different requirements between different systems, this move allowed the Group to focus on driving improvements. In 2024, the Group focused on requesting suppliers of services (i.e. labour hire, cleaning, waste disposal) to join SEDEX. With more suppliers completing and sharing their SEDEX Self-Assessment Questionnaire (SAQ), which includes questions on human rights and modern slavery issues, the Group was better placed to manage modern slavery risks.





## **Modern Slavery Audits** Cont.

### Other Audits

Workers are sourced through labour sending units under the Pacific Australia Labour Mobility (PALM) programme. The labour sending units are governed by the requirements set by the Department of Foreign Affairs and Trade (DFAT). Under the PALM programme, JBS Australia is subject to unannounced on-site audits and desktop audits.

The Group is also subject to other social and ethical audits conducted by, or on behalf of, our key customers. These audits also assess modern slavery risks.





## **Assessing the Effectiveness of Action Taken**



### **Monitoring Effectiveness**

We continue to monitor the effectiveness of the processes and procedures to address the modern slavery risks in connection with our business, in line with the Modern Slavery Act 2018 (Cth) and relevant international standards. We do this by:

- a) tracking our actions and outcomes;
- b) partnering with suppliers and other external partners (including platforms and partners such as Fair Supply);
- through regular engagement and training we have feedback loops where we can better understand from Business Units the risks as they develop on the ground;
- d) the Modern Slavery Steering Committee has representation from each Business Unit and several functions and we discuss trends in risks and improvement areas; and
- e) undertaking regular internal governance and external assurance processes such as SMETA Pillar 4 Audits.

Based on the results of these processes, we adapt and strengthen our actions to ensure continuous improvement in our response to modern slavery, including amending our strategy and approach to managing such risks where necessary.

#### Internal Consultation

This Modern Slavery Statement covers each Reporting Entity, following an active engagement and consultation process with the Modern Slavery Steering Committee and the executive leadership team of each Reporting Entity. This process included consideration and discussion of the reporting requirements, actions to address these requirements and identifying emerging modern slavery risks relevant to the Group.

The Modern Slavery Steering Committee includes representatives from Legal, Compliance, Sustainability, Risk, Procurement, Corporate and Regulatory Affairs, as well as representatives from each business unit.

A copy of this 2024 Modern Slavery Statement was provided to each entity owned and controlled by the Company.



### **External Collaboration**

The Group has strengthened its working relationship with Fair Supply to conduct risk assessments and leverage on subject matter expertise.

Incorporating company spend data throughout global markets, we have utilised Fair Supply to trace the economic inputs required to identify and estimate possible modern slavery risks of the supply chain of the Group's top suppliers by spend beyond Tier 1 suppliers.

This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:

- The United Nations' (UN) System of National Accounts;
- UN COMTRADE databases;
- Eurostat databases;
- The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
- Numerous National Agencies including the Australian Bureau of Statistics.

The MRIO is then examined against the following international standards:

- The UN Guiding Principles on Business and Human Rights;
- The Global Slavery Index;
- International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
- The United States' Reports on International Child Labour and Forced Labour.

A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile for each supplier beyond Tier 1 suppliers.

This analysis was performed for the purposes of risk identification under the Act. It does not purport to confirm the actual existence (or non-existence) of slavery in the Group's supply chain and operations. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level but is still a vital tool in helping to identify and assess modern slavery risks.







### **Activities Planned for 2025**

- Fair Supply will continue to be engaged to conduct detailed risk assessments on a broader range of suppliers to identify the Group's high-risk suppliers and changes in risk over time.
- All 20 processing facilities in Australia and New Zealand will be required to undergo SMETA Pillar 4 audits which will include the additional Pillar of Business Ethics ensuring these sites are audited on modern slavery issues.
- Launch of an annual "Compliance Month" with Modern Slavery as one of the 4 compliance areas in focus.
- Launch of an updated elearning module on Modern Slavery and Human Rights.



# **Mandatory Criteria Reporting Matrix**

Criterion	Mandatory Criteria	Page Reference
1	Identify the reporting entity.	3, 29, 30
2	Describe the reporting entity's structure, operations and supply chains.	8 - 14
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	14, 18 - 22
4	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	15 – 26
5	Describe how the reporting entity assesses the effectiveness of these actions.	21 – 26
6	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	13, 18, 25



# **Reporting Entities**

The following Group entities are considered reporting entities under the Modern Slavery Act 2018 (Cth), and this statement has been approved by the Board of Directors of each of these companies:

Andrews Meat Industries Pty Ltd	12 May 2025
Australian Consolidated Food Holdings Pty Ltd	12 May 2025
Baybrick Pty Ltd	12 May 2025
Diamond Valley Pork Pty Ltd	12 May 2025
Huon Aquaculture Company Pty Ltd	12 May 2025
Huon Aquaculture Group Pty Ltd	12 May 2025
Industry Park Pty Ltd	12 May 2025
JBS Aquaculture Pty Ltd	12 May 2025
JBS Australia Finance 1 Pty Ltd	12 May 2025
JBS Australia Finance Pty Ltd	12 May 2025
JBS Australia Pty Ltd	12 May 2025
Premier Beehive Holdco Pty Ltd	12 May 2025
Primo Foods Pty Ltd	12 May 2025
Rivalea (Australia) Pty Ltd	12 May 2025
Rivalea Holdings Pty Ltd	12 May 2025
S&C Australia Holdco Pty Ltd	12 May 2025
S&C Australia Investments Pty Ltd	12 May 2025
Seven Point Pork Pty Ltd	12 May 2025
White Stripe Foods Pty Ltd	12 May 2025





### **Execution**

ANDREWS MEAT INDUSTRIES PTY LTD (ACN 500 428 537)

AUSTRALIAN CONSOLIDATED FOOD HOLDINGS PTY LTD (ACN 152 947 IDI)

BAYBRICK PTY LTD (ACN 067 220 017)

DIAMOND VALLEY PORK PTY LTD (ACN 095 045 695)

HUON AQUACULTURE GROUP PTY LTD (ACN 114 456 781)

HUON AQUACULTURE COMPANY PTY LTD (ACN 067 386 109)

INDUSTRY PARK PTY LTD (ACN 007 256 215)

HUGH BRENT EASTWOOD DIRECTOR

Hugh Brent Eastwood

WHITE STRIPE FOODS PTY LTD (ACN 105 781 977)

MATTHEW LYNE DIRECTOR

— DocuSigned by:

Matthew Lyne
7167032536D3408

JBS AUSTRALIA PTY LTD (ACN 011 062 338)

JBS AQUACULTURE PTY LTI (ACN 653 348 700)

JBS AUSTRALIA FINANCE PTY LTD (ACN 609 765 371)

JBS AUSTRALIA FINANCE 1 PTY LTD (ACN 609 968 989)

PREMIER BEEHIVE HOLDCO PTY LTD (ACN 609 698 606)

PRIMO FOODS PTY LTD (ACN 002 781 142)

RIVALEA (AUSTRALIA) PTY LTD (ACN 004 892 835) RIVALEA HOLDINGS PTY LTD (ACN 097 393 112)

S&C AUSTRALIA HOLDCO PTY LTD (ACN 100 767 851)

S&C AUSTRALIA INVESTMENTS PTY LTD (ACN 609 705 615)

SEVEN POINT PORK PTY LTD (ACN 088 688 975)

DATE: 12/5/2025

DATE: 12/5/2025



# **AUSTRALIA**

Corporate Office

215 Adelaide Street

Brisbane QLD 4000

JBS Australia Modern Slavery Statement