

# Modern Slavery Statement

For the financial year ending 30 June 2023

**HARVEST**  
— R O A D —

Harvest Road Group Pty Ltd



# Contents

<b>Summary Of Our Response To The Modern Slavery Act 2018 (Cth)</b>	<b>4</b>
<b>Introduction</b>	<b>6</b>
<b>Identify The Reporting Entity</b>	<b>7</b>
• Approval & Our Structure	7
<b>Our Values And Commitment To Ending Modern Slavery</b>	<b>8</b>
<b>Our Operations And Supply Chains</b>	<b>9</b>
• Who We Are	9
• Our Operations	9
• Our Employees	10
• Our Supply Chains	11
<b>Our Modern Slavery Risks</b>	<b>12</b>
• Operational Risks	12
• Supply Chain Risks	13
<b>Assessing &amp; Addressing Modern Slavery Risks</b>	<b>14</b>
• Our Governance Framework	15
• Risk Management and Assessment	17
• Supplier Engagement, Corrective Action and Remedy	18
• Case Study: Modern Slavery Working Group And Supplier Engagement To Raise Modern Slavery Awareness	18
• Due Diligence and Actions Undertaken	19
• Seasonal workforce labour hire	19
• Migrant workers the beef processing facility in Harvey	19
• Supply chain risks due diligence	20
• Training and Collaboration	21
• Case Study: Modern Slavery Screening In Tender Documentation	22
• Case Study: Supporting Our PALM Scheme Workers	22
<b>Remediation Of Modern Slavery Risks</b>	<b>23</b>
<b>Measuring Effectiveness And Our Future Commitments</b>	<b>24</b>
• Our Effectiveness	24
• Future Commitments	26
<b>Consultation With Owned And Controlled Entities</b>	<b>26</b>

# Summary of Our Response to the Modern Slavery Act 2018 (cth)

Criteria	Description	Reference in this Statement
Identify the reporting entity (s16 (1) (a))	Harvest Road Group Pty Ltd	Approval & Our Structure – page 7.
Describe the structure, operations and supply chains of the reporting entity (s16 (1) (a) – (b))	Harvest Road Group is an Australian agrifoods business that produces high-quality food sold under the Harvey Beef, and Leeuwin Coast (and other associated) brands for domestic and international markets. Our products are exported to more than 30 different countries.	Approval & Our Structure – page 7. Our Operations & Supply Chains – page 9.
Describe the risk of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls (s16 (1) (c))	Harvest Road Group has identified the following modern slavery risks in its operations and supply chains: <ul style="list-style-type: none"> <li>• Australian beef cattle supply chain.</li> <li>• Seasonal and migrant workers.</li> <li>• Solar panel, uniforms and electronics procurement.</li> </ul>	Our Modern Slavery Risks (Supply Chain Risks & Operational Risks) – page 12 to 13.
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes (s16 (1)(d))	The modern slavery screening process for new suppliers was introduced and for existing suppliers, the process was enhanced. <ul style="list-style-type: none"> <li>• Issued Self-Assessment Questionnaires (SAQ's) to high-risk suppliers.</li> <li>• Enhanced our centralised system to manage the supplier modern slavery screening process.</li> <li>• Engaged with suppliers to ensure issues are understood and to drive continual improvement.</li> </ul>	Risk Management & Assessment – page 17. Supplier Engagement, Corrective Action & Remedy – page 18. Due Diligence & Actions Taken – page 19 to 22. Case Study – Modern Slavery Screening in Tender Documentation – page 22.

Criteria	Description	Reference in this Statement
	<ul style="list-style-type: none"> <li>• Undertook an internal audit and facilitated external audits on the recruitment process for migrant workers at our beef processing facility, including those employed through the Pacific Australia Labour Mobility (PALM) Scheme for migrant workers.</li> <li>• Incorporated modern slavery considerations in tender and request for proposal documentation.</li> <li>• Provided employees with internal education and modern slavery training.</li> </ul>	Case Study – Supporting Our PALM Scheme Workers at the Beef Processing Facility in Harvey – page 22. Case Study – Modern Slavery Working Group and Supplier Engagement to Raise Modern Slavery Awareness – page 22.
Describe how the reporting entity assesses the effectiveness of such action (s16 (1) (e))	To ensure consistency between reporting periods, progress against our commitments is set out in the 'measuring effectiveness framework'. Our 'future commitments' provide a clear roadmap for the next reporting period.	Measuring Effectiveness and our Future Commitments – page 24 to 26.
Describe the process of consultation with any entities that the reporting entity owns or controls (s16 (1) (f))	Engagement across all entities for consistent modern slavery approach, including oversight by the Board of Directors and Chief Executive Officer.	Approval & Our Structure – page 7. Consultation with Owned & Controlled Entities – page 26.

# Introduction

Harvest Road Group is proud to present our second Modern Slavery Statement.

We acknowledge the inherent risk of modern slavery in our agriculture and beef processing operations and supply chains, and we remain diligent in addressing this issue. We recognise the importance of making continuous improvements and ensuring that reducing our modern slavery risk is part of our daily business.

Harvest Road Group has continued to improve the way in which we identify modern slavery risk, through an enhanced supplier screening process. Allowing us to focus our time and resources on parts of our operations and supply chain that carry the greatest risks.

We have also put modern slavery at the forefront of our formal tender and request processes, by integrating modern slavery into our award criteria.

Looking ahead to next year, we will continue to openly engage with our business network, our suppliers and partners. To uphold ethical standards and foster a culture of responsible business practices.

**Tim Wood**  
CEO, Harvest Road Group

# Identify the Reporting Entity

## Approval & Our Structure

This Modern Slavery Statement ("Statement") is published on behalf of Harvest Road Group Pty Ltd (ACN 169 138 014) and its owned and controlled entities (referred to collectively in this Statement as "we", "us", "our" and "Harvest Road Group", unless the context requires differentiation of individual entities), to meet the reporting requirements under the *Modern Slavery Act 2018 (Cth)* ("the Act") for the year ended 30 June 2023.

Harvest Road Group's wholly owned subsidiary Harvey Industries Group Pty Ltd (ACN 117 597 985) individually met the Act's annual revenue threshold for the reporting period (FY22-23). Accordingly, this is a joint Statement on behalf of two reporting entities: Harvest Road Group Pty Ltd and Harvey Industries Group Pty Ltd.

Last year, Harvest Road Group disclosed its approach to modern slavery in our first standalone modern slavery Statement.

This second statement demonstrates how Harvest Road Group continues to mature its approach in identifying, addressing, and addressing modern slavery.

This Statement addresses the activities of Harvest Road Group Pty Ltd, Harvey Industries Group Pty Ltd and other controlled entities which sit within Harvest Road Group but are not reporting entities in their own right. These controlled entities include:

- Harvest Road Pastoral Pty Ltd (ACN 619 252 621)
- Harvest Road Breeding Pty Ltd (ACN 655 624 212)
- Koojan Downs Pty Ltd (ACN 628 244 628)
- Harvest Road Oceans Pty Ltd (ACN 165 170 445)
- Harvest Road Management Services Pty Ltd (ACN 652 232 847)

Consultation and engagement across Harvest Road Group has occurred in the preparation of this Statement, as well as in relation to Harvest Road Group's broader modern slavery response. This included meetings with representatives from Harvest Road Group's business operations and leadership team.

The Board of Harvest Road Group Pty Ltd and Harvey Industries Group Pty Ltd approved this Statement on 19th December 2023.

This Statement is signed by John Hartman, who is a director of both reporting entities covered by this joint Statement pursuant to section 14(2)(e) of the Act.



**John Hartman**  
Director, Harvest Road Group Pty Ltd  
Director, Harvey Industries Group Pty Ltd

You can download last year's Modern Slavery Statement [here](#)

# Our Values and Commitment to Ending Modern Slavery

At Harvest Road Group, our 10 values are at the heart of everything we do. They drive our culture and philosophy and underpin our approach to conducting business.

We remain committed to acting ethically and with integrity across all aspects of our business. We strive to uphold and protect the rights of all of those who work for, or on behalf of, the Harvest Road Group. We are also committed to protecting and respecting the rights of people who may be impacted by our activities, including those in our supply chains.

We continue to acknowledge the risk of modern slavery occurring in our own operations and supply chain and are focused on implementing and continuously improving effective systems and processes to address these risks.

## Our Values

### Courage & Determination

NEGU – we never ever give up

### Generating Ideas

Always be on the lookout for breakthroughs

### Empowerment

Go to your leader for advice, not permission

### Humility

Be vulnerable, take risks to trust others

### Enthusiasm

Be the most positive person in the room

### Integrity

Do what you say you're going to do

### Family

Support each other, always be kind

### Safety

Look out for your mates and yourself

### Frugality

Think of ways we can do things better, faster, cheaper, safer

### Stretch targets

Always be uncomfortable with your level of challenge

# Our Operations and Supply Chains

## Who We Are

Harvest Road Group is an Australian agrifood business, with operations comprising of cattle production, beef processing, and aquaculture. Harvest Road Group's vision is to deliver Australia's best sustainable produce to the world.

## Our Operations

### Agribusiness

Our Agribusiness manages cattle breeding, backgrounding and feeding operations across six pastoral aggregations, three farming properties and a feedlot spanning the Kimberley, Pilbara, Gascoyne and Midwest regions of Western Australia. In addition, we have a horticulture business based near Carnarvon. Our Agribusinesses' operations are highly seasonal and in addition to our full time workforce we also utilise seasonal workers and contractors during peak periods throughout the year.

Major procurement categories within the Agribusiness include livestock, plant & equipment, feed (hay, silage and grain), fuel and freight.

### Harvey Beef

Our beef processing facility in Harvey is located 140km south of Perth. We procure livestock from a network of suppliers spanning Western Australia including from our own Agribusiness. Our workforce comprises c.800 employees, including skilled migrant workers from the Pacific Islands who are employed under the Pacific Australia Labour Mobility (PALM) Scheme.

We have a dedicated procurement team responsible for coordinating and sourcing for the beef processing facility, including engineering parts, uniforms, and packaging. Our beef products are sold domestically and internationally, exported to over 30 different countries.

### Leeuwin Coast

Our aquaculture leases are based off the coast of Albany 450km south of Perth. The aquaculture operations span nursery, spat deployment, on-water grow out, harvesting and grading. Our aquaculture products are primarily sold domestically.

Major procurement categories within the aquaculture business include construction services and materials, plant and equipment, water farming infrastructure (baskets, buoys, ropes and anchors etc) and third party processing services.



## Our Employees

During this reporting period, Harvest Road Group employed a total of 1052 people. The breakdown of employment types is set out below. It included 838 full-time employees (comprising 79.7% of all employees), 17 part-time employees, 8 fixed term contracted employees and 189 casual staff.

All our staff are employed in strict compliance with local laws and regulations. Our Australian terms and conditions of employment are underpinned by the *Fair Work Act 2009 (Cth)* and the National Employment Standards (NES).

In relation to the workers employed under the PALM Scheme for Harvey Industries Group Pty Ltd, we ensure strict compliance with the NES. For example, the following minimum terms are set out in all employee and PALM worker contracts and communicated clearly:

- Hours of work;
- Remuneration;
- Leave entitlements, including annual leave, public holidays, parental leave, compassionate leave, personal/carer's leave, community leave, jury service leave, family and domestic violence leave;
- Benefits; and
- Notice period.

All of our employees, including PALM Scheme workers are paid at or above the Australian living wage.

Migrant workers are more likely than non-migrants to be in forced labour. How we have addressed the elevated modern slavery risk in relation to contracted workers is discussed on page 19.

Entity	Total	Full-time (or equivalent)	Part-time	Casual	Fixed term contract	Other features
Harvest Road Group Pty Ltd	79	74	2	1	2	7 workers on visa 1 permanent resident on visa
Harvey Industries Group Pty Ltd	800	640	8	152	0	403 workers on visas 40 permanent residents on visas
Harvest Road Oceans Pty Ltd	49	41	1	6	1	1 worker on visa
Harvest Road Pastoral Pty Ltd	93	61	6	24	2	4 workers on visa 3 contracted labour hire workers
Koojan Downs Pty Ltd	31	22	0	6	3	3 workers on visa

Total	1052	838	17	189	8
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## Our Supply Chains

During the reporting period, Harvest Road Group procured through 2282 direct suppliers in the first tier of our supply chain, being those suppliers that we have a direct contractual relationship with ("Tier One Suppliers"). We engaged with 310 more individual suppliers during this reporting period in comparison to the last reporting period. As our supplier base has grown, we have undertaken comprehensive modern slavery risk assessments on new suppliers. A full description of our risk management and assessment procedures is set out on page 17 of this Statement.

98.17%

**of our Tier One Suppliers are operating in Australia.**

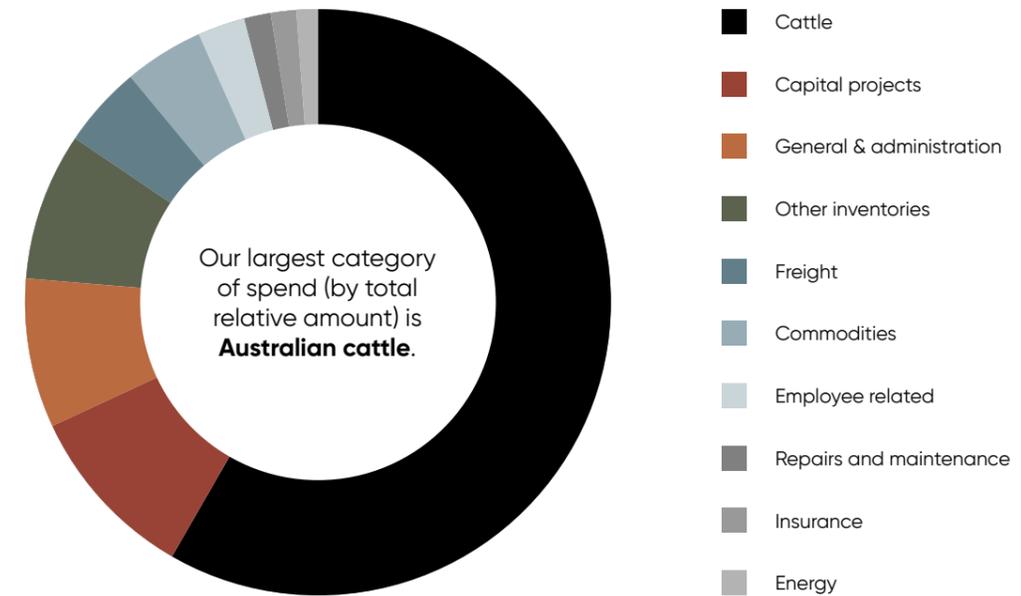


Figure 1: Harvest Road Group's largest categories of spend (by total relative amount)

We also have a small number of overseas Tier One Suppliers. Figure 2 below sets out total supplier spend by country. The main industry categories that we source from overseas include:

- Argentina beef product supply chain;
- Machinery and equipment.

We understand the intricacies of complex global supply chains, including our Tier One Suppliers, and the fact that many products purchased from local companies are either manufactured overseas or incorporate significant components from abroad.

The increased expenditure in **capital projects** reflects the shift in some of our core primary businesses projects. Several significant projects have progressed from the construction phase into the fit-out phase, prompting investments in specialised equipment.

Country	Percentage of Spend %
Australia	98.17
Argentina	0.61
Netherlands	0.45
New Zealand	0.55
Singapore	0.06
Other countries	0.16

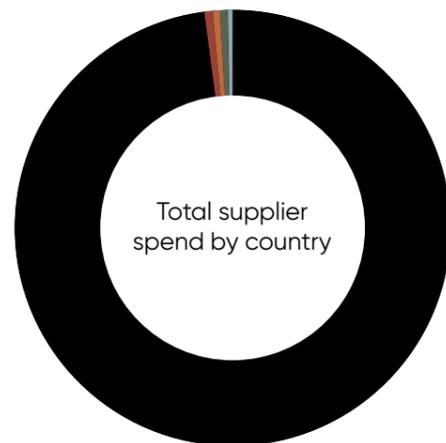


Figure 2: Total supplier spend by country

## Our Modern Slavery Risks

### Operational Risks

#### Migrant workers in the beef processing facility in Harvey

Some of the factors contributing to potentially increased vulnerability include:

- Practices such as deceptive recruitment by labour hire agencies, which can result in compounding debt bondage;
- Hesitation to speak out for fear of having visa or immigration status revoked;
- Pressure to continue to financially support family members located in low socioeconomic geographies; and
- Lower-level English skills and minimal awareness about rights and protections under Australian law.

Given the specific modern slavery risks associated with employing migrant workers, Harvest Road Group has carried out specific due diligence to ensure that no workers were recruited through any approach or practice that was in anyway unfair, coercive or exploitative. A full description of due diligence activities undertaken is set out on page 19.

#### Seasonal workforce labour hire

To meet the operational needs of our seasonal horticulture business, we contracted three seasonal workers through the reporting period. We are developing our governance for the engagement of seasonal workers in our horticulture business and see this as an area of focus in the next reporting period.

## Supply Chain Risks

To identify modern slavery risks in our supply chains, Harvest Road Group conducts modern slavery risk assessments of our suppliers to identify risk based on the industry and country of those suppliers. Supply chain mapping was performed using an Integrated Assessment Engine developed by FairSupply<sup>1</sup>. Their global Multi-Regional Input-Output (MRIO) table links supply chain data from 38,000 industry and country sector combinations. The MRIO is then examined against international standards. This process generates a modern slavery risk profile reflecting 10 tiers of our suppliers. This helps us to achieve practical visibility, from the raw materials used in the production of goods through to the services ultimately provided by our suppliers.

**Australian beef cattle supply chain** has been identified at the highest potential overall modern slavery risk exposure to our business (considering potential inherent industry category risks and our relative spend amounts). This assessment has confirmed that the elevated areas of potential risk are concentrated at, or proximate to, our Tier One Suppliers.

In addition to supply chain mapping, we also acknowledge the Australian import industries which have an elevated risk for modern slavery as reported in the 2023 Global Slavery Index published by Walk Free<sup>2</sup>. We have included the following relevant industries as a supply chain risk:

**Electronics (laptops and mobile phones):** Harvest Road Group regularly purchases laptops and mobile phones for employee work use.

**Solar Panels:** Harvest Road Group continues to scope the procurement of solar panels to maximise the use of renewable energy in our day-to-day operations. While we are excited about the benefits of an energy transition that will significantly reduce the overall carbon footprint of our operations, we are conscious of the real and potential risk of human rights abuses associated with global solar energy supply chains.

**Uniforms:** Many of our employees wear uniforms. We recognise that the manufacture of such apparel and associated supply chains are areas of potentially significant modern slavery risk.

<sup>1</sup> This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 38,000 industry and country sector combinations. 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 to Tier 10 for Harvest Road Group's suppliers.

<sup>2</sup> Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation. Available from <https://www.walkfree.org/global-slavery-index/>



# Assessing and Addressing Modern Slavery Risks

Harvest Road Group's Modern Slavery Risk Management Framework (Modern Slavery Framework) guides our approach to limiting the risk of modern slavery practices in our supply chain. It comprises four key areas of focus:

## Governance

A framework of policies and contractual arrangements that embed our values in the way we operate.

## Risk Management

Undertaking due diligence to assess how goods and services in our supply chain are managed and produced, ensuring ethical recruitment and treatment of migrant workers.

## Continuous Supplier Engagement, Corrective Action and Remedy

Engaging with suppliers to better understand and support their efforts to combat slavery.

## Training and Collaboration

Raising awareness of modern slavery issues, both internally and through active collaboration with suppliers and external stakeholders.



## Our Governance Framework

Harvest Road Group's Board of Directors provide oversight of the management of our modern slavery risks. To support managing our modern slavery risk and response, Harvest Road Group has a suite of internal policies and procedures which are listed and described below.

Policy or Procedure	Purpose
Code of Conduct	<p>The Code of Conduct includes our commitment to respect human rights of all people, including employees, partners and the communities in which we operate. Our Code of Conduct prohibits all forms of modern slavery.</p> <p>The Code of Conduct is translated into Korean, Chinese, Tagalog and Bislama – languages spoken by workers at our beef processing facility in Harvey.</p>
Modern Slavery Policy	<p>The Modern Slavery Policy outlines our commitment to ending all forms of modern slavery in our operations and the operations of our suppliers.</p> <p>The core principles are informed by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the ILO Core Conventions on Labour Standards and the United Nations Global Compact:</p> <ul style="list-style-type: none"> <li>• Every worker should have freedom of movement;</li> <li>• No worker should pay for a job;</li> <li>• No worker should be indebted or coerced to work, nor subject to threats or abuse;</li> <li>• Workers should be paid fairly for the work they do;</li> <li>• No child labour;</li> <li>• Respect rights of workers to freedom of association; and</li> <li>• Workers should have access to an operational-level grievance mechanism.</li> </ul> <p>The principals of the policy extend not only to our employees, but also how we engage with, collaborate with our external suppliers and contracting workforce.</p>
Procurement Policy	<p>Our ethical procurement practices are outlined in the Procurement Policy, including the process for identifying, assessing and addressing modern slavery risk throughout the procurement process.</p>
Purchase Order Terms	<p>Our Purchase Order Terms documentation includes terms and conditions that specifically address modern slavery risks.</p> <p>The key terms of the Purchase Order Terms which address modern slavery risks include:</p>

Policy or Procedure	Purpose
	<ul style="list-style-type: none"> <li>Each supplier warrants that step have been taken by them to identify and address modern slavery in their own operations and supply chain. This specifically includes an appropriate grievance mechanism consistent with the criteria set out in the United Nations' Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy Framework."</li> <li>Each supplier warrants that if they suspect or become aware of modern slavery risk in their operations and supply chains, they must take all reasonable action to address or prevent these practices, including remediation and disclosure of the instance to us.</li> <li>Each supplier is prohibited from requiring any personnel from paying recruitment (or related) fees to secure employment and is prohibited from possessing the original of any workers personal identification documents.</li> </ul> <p>In this reporting period, modern slavery screening clauses were incorporated into the tender and request for proposal documentation. More information can be found in the following case study on page 22.</p>
Recruitment and Selection Procedure	Harvest Road Group's staff recruitment and selection procedure supports management and staff to appoint the most capable people to roles across the business. To address modern slavery risk factors, we ensure that international guidelines and local legislation in relation to minimum working age is adhered to.
Supplier Code of Conduct	<p>Harvest Road Group has adopted the Tattarang Supplier Code of Conduct which outlines our expectations of suppliers and their conduct regarding the core principles listed in our Modern Slavery Policy. This includes workplace health and safety, environmental protection and ethical practices. We expect that suppliers investigate their labour practices and supply chains, and promptly address any cases of modern slavery or related exploitation and report these to us. This also includes the expectation that suppliers pay their workers fairly for the work they do and either pay or take steps towards paying workers a living wage.</p> <p>Harvest Road Group is currently developing its own stand alone Supplier Code of Conduct which it hopes to implement early 2024.</p>
Whistleblower Policy	The Whistleblower Policy provides a practical tool for our stakeholders to disclose risk or wrongdoing in the workplace. It ensures that those who make disclosures will be protected and supported throughout the process.
Workplace Behaviour Policy	The Workplace Behaviour Policy outlines the expected behaviour and requirement of all staff to treat others with dignity, courtesy and respect. The policy names unacceptable workplace conduct in line with legislation including the <i>Australian Human Rights Commission Act 1986 (Cth)</i> .

Policy or Procedure	Purpose
Workplace Investigation Procedure	Applicable to both internal and external stakeholders, this procedure covers non-conformances, including any material breach of our modern slavery provisions, human rights violations or incidents of modern slavery.

**Modern Slavery Working Group**

Harvest Road Group operates its own internal Modern Slavery Working Group. Members of the group include staff from our ESG, People & Safety and Finance teams and is sponsored by the Chief Commercial Officer. The Modern Slavery Working Group supports and facilitates our modern slavery actions across each of the operating businesses within Harvest Road Group and ensures that all initiatives to address modern slavery are effectively implemented.

Suppliers must also adhere to the Tattarang Supplier Code of Conduct which has been adopted by Harvest Road Group. If there is an elevated inherent risk, the prospective suppliers are required to complete a Self-Assessment Questionnaire (SAQ) which requests information in the following key areas:

- Risk identification and assessment;
- Education and training;
- Policies and procedures;
- Grievance mechanism;
- Due diligence;
- Measuring effectiveness; and
- Remediation.

**Risk Management and Assessment**

**Pre-contract supplier screening for modern slavery risk**

As part of our ongoing due diligence, we worked to embed the pre-contract supplier screening process across all Harvest Road Group business units. New prospective suppliers are screened to assess their initial level of modern slavery risk based on the product/service and their geographical origins.

**Existing supplier's inherent risk assessment**

Using FairSupply's Integrated Assessment Engine (refer to page 13) we assess all our suppliers for modern slavery risk based on expenditure and potential inherent industry risk. All suppliers with elevated inherent risk are requested to complete a SAQ to provide more information about the risks in their operations, supply chains and how they are mitigating them. If required, we will conduct further due diligence by engaging directly with the supplier.



## Supplier Engagement, Corrective Action and Remedy

To provide transparency and insights into our supplier engagement efforts, we present a breakdown of supplier engagement, actions, and remedies in the table below. During the reporting period, we achieved a SAQ return rate of 44.4%. If further investigation is required after reviewing the SAQ responses, we will engage directly with the supplier to conduct due diligence.

Our approach to additional due diligence activities includes measures such as follow-up through email communication, conducting management interviews, performing desktop audits, and conducting on-site visits. Where appropriate, we also take the opportunity to share educational resources to support our suppliers' understanding of modern slavery and its implications.

Due diligence activity	Result FY23
Number of SAQ's issued	99
Number of SAQ's returned	44 (44.4%)
Number of SAQ's requiring follow up clarifications via email	27
Number of management interviews	1
Number of suppliers sent educational resources	10

As a result of modern slavery screening, a Tier One Supplier was identified as having an elevated modern slavery risk profile. In response, Harvest Road Group took proactive measures and conducted a management interview with the supplier to discuss potential opportunities for improvement in their supply chain practices. While no instances of modern slavery were detected, we emphasised the importance of collaboration and transparency in addressing modern slavery risks.

Unfortunately, despite our efforts to work together the supplier showed no interest in cooperating. After considering the situation we decided to discontinue working with the supplier.

Harvest Road Group did not identify any instances of modern slavery during the reporting period. We have outlined our remediation of modern slavery risks on page 23.

### Case Study: Modern Slavery Working Group and Supplier Engagement to Raise Modern Slavery Awareness



Harvest Road Group recognises it's important we bring our suppliers and customers along on the journey, raising awareness through our due diligence processes and fostering meaningful conversations. A notable example of this engagement took place through the modern slavery screening process during supplier onboarding.

A member of our agribusiness team collaborated with the Modern Slavery Working Group, requesting them to engage with a new supplier seeking further clarification about the new supplier form, specifically the modern slavery section. This situation provided an opportunity to provide the supplier with background information on modern slavery and the potential risks. The supplier showed a keen interest in the topic and sought information on how to obtain resources to share within their network. This serves as an example of our continuous communication efforts with the goal of extending our impact beyond our primary Tier One Suppliers.

## Due Diligence and Actions Undertaken

Given the potential elevated risk of modern slavery in industries which Harvest Road Group operates, we recognise the importance of effectively addressing those risks and continually improving our overall modern slavery response.

### Migrant workers in the beef processing facility in Harvey

#### PALM Scheme

As reported in our previous statement, we continue to participate in the Pacific Australia Labour Mobility (PALM) Scheme ("the Scheme") for migrant workers for employment at our beef processing facility in Harvey. The Scheme is managed by the Department of Foreign Affairs and Trade (DFAT) and the Department of Employment and Workplace Relations (DEWR) with the support of an external provider, the Pacific Labour Facility (PLF). Before participating in the Scheme, we had to satisfy a strict criterion established by the Australian Government.

In addition to the strict requirements of the Scheme, the following key activities are undertaken by Harvest Road Group:

- Travel overseas to conduct in-person interviews for recruitment.
- Employment contracts for all workers are translated into the applicable local language.
- Maintenance of a "zero fees" recruitment policy which ensures that no worker pays any fees during the recruitment process.
- Once workers arrive in Australia, a cash advance, pre-paid mobile phone and food is immediately provided.
- We ensure that suitable furnished accommodation in the local community is organised, and all utilities are connected.
- The whistleblower hotline is available to all workers and displayed in accessible areas.
- To ensure that arriving workers continued to be protected from recognised factors that can create vulnerabilities, we facilitated local community connections, including access to local services and recreation activities

On arrival, PALM Scheme workers work through a series of inductions to help them settle in Australia and prepare for their new jobs:

- The 'PALM on arrival briefing' developed by the Australian Government contains information on various topics including Australian customs, culture, wages, conditions, accommodation, transport, general health, respectful relationships, drugs, alcohol, mental wellbeing and Australian law.
- The company induction explains important policies and procedures including the Code of Conduct, Workplace Behaviour Policy, Employee Grievance and Dispute Resolution Procedure and Whistleblower information. Workers are introduced to the Employee Self Services (ESS) portal where payslips, policies and procedures can be accessed.
- The safety of our employees is of utmost importance and all workers must complete the Safety Induction.

Please refer to page 22 case study about how we further support PALM Scheme workers in their new jobs and life in Australia.

#### Internal on-site audit

During the reporting period, we undertook an onsite audit of our beef processing facility in Harvey. The objective of this audit was to determine whether workers have been treated appropriately throughout the recruitment process, some of which occurred overseas. The audit was conducted by two members of our Modern Slavery Working Group and interviewed ten migrant workers.



The audit criteria included an assessment of:

- Whether workers were provided an employment contract in a language they could understand including minimum notice periods and restrictions.
- Whether the workers were charged or had unauthorized amounts deducted from their wages.
- If the workers experienced any of their original identity documents being confiscated.
- If the workers were given proper information about the job they would be performing in Australia.
- If the workers were provided with adequate information about how to raise complaints and report grievances.
- If the workers have ever been placed under pressure to remain in their job; and
- If the workers are treated the same as local employees and if they felt respected and supported in their jobs.

The results of the audit demonstrated no concerns. It confirmed that migrant workers had been appropriately treated throughout the recruitment process and into their period of active employment with Harvest Road Group.

#### External audits

Our beef processing facility in Harvey cooperates with our external customers to facilitate Supplier Workplace Accountability Audits. The audit criteria included assessment of the following areas of compliance:

- Business integrity;
- Management systems and grievance mechanisms;
- Human rights employment and recruitment;
- Involuntary labour;
- Underage labour ;
- Discrimination, harassment and abuse; and
- Working hours

This year, one external audit was conducted, interviewing 25 employees from the beef processing facility. The audit revealed one minor finding which is in process of being rectified. The audit did not uncover any significant issues.

## Supply Chain Risks Due Diligence

In conjunction with the supplier modern slavery screening process detailed on page 17, we have carried out supplementary due diligence activities within supply chains identified as high risk.

#### Australian beef cattle supply chain

While the inherent risk profile for Australian cattle is comparatively lower within the global livestock industry, we acknowledge the necessity for continuous vigilance due to our significant spend in this sector. All suppliers are subject to our supplier modern slavery screening process, and we continue to initiate further due diligence when required. This year we engaged directly with two of our largest expenditure suppliers who have dedicated personnel to manage modern slavery. Both suppliers shared information about their business operations and supply chains, and we maintain a strong collaborative relationship with them.

#### Solar panel procurement

As part of our product research and selection process for solar projects, products have been shortlisted from manufacturers and suppliers that show continuous monitoring of modern slavery issues associated with polysilicon production. The prospective solar panel suppliers completed the SAQ, and we also reviewed their active plans to monitor and address modern slavery risks in their supply chains. We will continue to conduct due diligence and build relationships with our suppliers as our solar projects expand.

#### Uniforms

We continue due diligence in relation to the manufacture of apparel and related supply chains using the modern slavery screening process for new and existing suppliers. We engage with our suppliers to improve their understanding of key modern slavery issues within the apparel industry and encourage our suppliers to 'cascade' our anti-slavery approach deeper into their supply chains.

#### Electronics

We completed a 'deep dive' investigation on our Tier One suppliers of electronics. This included reviewing supplier's human rights policies, labour policies and modern slavery Statements. While our Tier One Suppliers appear to have procedures and standards in place to address modern slavery risk, we acknowledge the complexity of the electronics supply chain. Our technology team is using the deep dive report to facilitate engagement with our suppliers, aiming to continuously improve managing risk.

## Training and Collaboration

#### Staff training

We provide our staff with training to increase modern slavery awareness and improve efficiencies in modern slavery screening processes. For the reporting period the following training activities were executed;

- Consulted with procurement and finance teams to improve, update supplier forms and procedures for efficient supplier screening process.
- Formed an internal 'ESG Hub' intranet page, serving as central source for all staff to access, save all modern slavery documentation including supplier forms, procedures, and educational resources.
- Delivered in-person training to staff about the improved modern slavery screening process.
- Distributed internal e-comms throughout the year to raise modern slavery awareness.
- Continued to provide all new staff with a copy of the Modern Slavery Policy.
- Continued to provide online modern slavery training modules to all new staff at onboarding. The online training ensures all employees are familiar with specific provisions in relation to our Modern Slavery Policy and Code of Conduct.
- Rolled out refresher modern slavery training to all existing staff.

In response to a significant proportion of staff at the beef processing facility in Harvey not having work email addresses, we took proactive steps to ensure this cohort received modern slavery awareness education. We tailored the information to be delivered on electronic posters displayed around the beef processing facility. The posters accommodate the languages commonly spoken by our diverse group of migrant workers including English, Bislama, Tagalog, Chinese and Korean. By doing so, we aimed to make the information easily accessible and understandable for all employees.

The posters contained;

- An explanation of the term 'modern slavery'.
- Statistics on the prevalence of modern slavery globally.
- The whistleblower hotline information.

#### Tattarang Modern Slavery Working Group Collaboration

Whilst Harvest Road Group manages its own modern slavery activities, we are also active representatives in the Tattarang Modern Slavery Working Group. The group meets monthly to consider Tattarang's overall approach to modern slavery, including "end goals" of each business and streamlining processes to achieve specific objectives. As an active member we remain fully engaged on how we can continuously improve our approach to identifying, assessing and addressing modern slavery issues.

#### External stakeholders

Harvest Road Group collaborates with our supply chain, industry partners and customers to foster a knowledge-sharing environment, helping to raise modern slavery awareness and promote responsible business practices. Read more in our case study on page 22.



### Case Study: Modern Slavery Screening in Tender Documentation



Harvest Road Group has a number of capital works projects both current and planned. Upholding our commitment to transparency across our supply chains, we have integrated considerations regarding Environmental, Social, and Governance (ESG) factors, including modern slavery, into the assessment criteria for our tender and request for proposal documentation.

Proponents are evaluated on their capacity to demonstrate a serious, effective approach to addressing ESG criteria and modern slavery risks in their operations and supply chain. During the assessment phase, active collaboration with the proponents will occur to solicit supplementary information and clarifications. After gathering all necessary information, the evaluation matrix assigns a weighted score to each submission, facilitating the identification of the most fitting respondent.

This demonstrates our commitment to identifying and managing modern slavery risks in our business. Moreover, it highlights our proactive efforts to raise awareness about modern slavery through meaningful collaborations with external stakeholders.

### Case Study: Supporting Our PALM Scheme Workers



A dedicated team plays a crucial role in carrying out the initiatives aimed at welcoming and supporting the migrant workers. Comprising of compassionate, experienced professionals, this team is specifically assigned to ensure the seamless integration of our workers into their new lives in Australia, fostering a sense of security and belonging within the community. The initiatives we have in place go above and beyond what is required in the PALM Scheme and are entirely at Harvest Road Group's election.

The accommodation initiative in place takes care of all the essential details to make our workers feel at home from day one. This includes arranging suitable accommodation, organising furniture, connecting household amenities, and providing a week's worth of groceries to ensure their immediate needs are met. We understand that settling into a new country can be financially challenging, so we strive to alleviate this burden by covering rent and household expenditures for the first two weeks.

We provide each home with access to vehicle to ensure they have reliable, transportation to and from work. For those workers who possess a valid driver's license in their home country, we take an extra step in supporting their independence and mobility by assisting them in obtaining an Australian driver's license.

At our beef processing facility in Harvey, we take immense pride in our inclusive and supportive approach towards our migrant workers. Understanding the unique challenges they may face; we are committed to their well-being and security by offering comprehensive support and resources.

Our support of our migrant workers extends beyond the workplace, embracing our migrant worker's well-being on all fronts, including during weekends. Taking on the role of friendly guides, the team acquaints our workers with the essentials of daily life in Australia; from guiding them to the best places to shop and manage their banking needs, to assisting them finding a church if they wish to connect with a faith community. Workers are introduced to social sporting clubs which provides an opportunity to connect with fellow colleagues and members of the community. The team also offers transportation and assistance to access medical services, even for non-work-related needs.

The initiatives we have in place for our migrant workers are designed to assist their practical challenges during their transition to Australia. Through the unwavering dedication of our remarkable team, we aim to create a positive and inclusive work environment where everyone can feel safe, valued, and empowered from the very beginning of their journey with us.

## Remediation of Modern Slavery Risks

During the reporting period we did not identify any instances of modern slavery. Nevertheless, we recognize the pervasive nature of modern slavery in global supply chains and are fully dedicated to enhancing our risk identification and assessment processes. If we discover that our actions have caused, contributed to, or are directly linked to actual or suspected instances of modern slavery, we are resolute in our commitment to provide remedy or facilitate access to remedy for all those adversely impacted. We will do this through the implementation of corrective action plans. Harvest Road Group has documented its approach to remediation of all incidents of actual or suspected nonconformance (including modern slavery concerns) ("Workplace Investigation Procedure"). This Workplace Investigation Procedure covers non-conformances, including any material breach of our modern slavery provisions, human rights violations or incidents of modern slavery. In each case where a serious non-conformance incident is identified, a report is produced and shared with the relevant General Manager. No non-conformances in relation to modern slavery concerns were identified during the reporting period. Our remediation process is supported by policies which clearly define the procedures undertaken internally to remediate harm. Our Workplace Behaviour Policy outlines the expected behaviour and requirement of all staff to treat others with dignity, courtesy and respect ("Workplace Behaviour Policy"). The Workplace Behaviour Policy names unacceptable workplace conduct in line with legislation including the *Australian Human Rights Commission Act 1986 (Cth)*.

Our Employee Grievance and Dispute Resolution Procedure has been translated into the main languages spoken at our beef processing facility in Harvey (Korean, Chinese, Tagalog and Bislama). All translated documents are stored on the Employee Self Service system (ESS), where employees can access any time. The multilingual whistleblower hotline remains prominently featured on numerous electronic display screens within the beef processing facility. These screens showcase the hotline information in a total of four commonly used languages by our workforce.



# Measuring Effectiveness and Our Future Commitments

## Our Effectiveness

An important measure for transparency in our overall modern slavery response is ensuring continuity between reporting periods. This involves providing detailed information on the areas where we have successfully implemented key performance indicators (KPI's) and those where we are still working towards achieving them. During the reporting period, we determined our effectiveness in each action based on whether we had completed the action or not, noted in the ('progress report').

However, we acknowledge the potential to improve our assessment framework by implementing targeted KPI's in the next reporting period. In our previous statement, we highlighted specific focus areas for this reporting period. The table below presents these focus areas, along with a progress report:

Area of focus	Improvement initiative	Specific measures identified for this (FY22-23) reporting period	Status Progress report period
Governance	Enhance the supplier screening process, with a focus on uniformity. Upgrade the overall process of issuing supplier SAQ's to all new suppliers through a centralised system.	<ul style="list-style-type: none"> <li>Embed pre-contract supplier screening process across all Harvest Road Group business units.</li> <li>Establish a centralized 'ESG Hub' intranet page to access modern slavery resources.</li> <li>Track and monitor the supplier screening process through new or existing systems</li> </ul>	Complete.
Governance	Develop standalone Supplier Code of Conduct.	<ul style="list-style-type: none"> <li>Produce draft and initiate approval process.</li> </ul>	In draft - to be approved by group leadership team
Governance	Scoping possibility of introducing modern slavery specific provisions to our current grievance mechanism.	<ul style="list-style-type: none"> <li>Initiate discussions with relevant teams.</li> </ul>	Review in progress.
Risk Assessment	Undertake quarterly modern slavery audits on the recruitment process on at least ten migrant workers at our beef processing facility in Harvey.	<ul style="list-style-type: none"> <li>Conduct audits.</li> </ul>	Partially complete. Two audits were completed.
Supplier Engagement, Corrective Action and Remedy	Continue to review and conduct due diligence of solar panel suppliers as part of planned procurement projects.	<ul style="list-style-type: none"> <li>Conduct due diligence on prospective suppliers.</li> </ul>	Complete and ongoing.

Area of focus	Improvement initiative	Specific measures identified for this (FY22-23) reporting period	Status Progress report period
Training and Collaboration	Provide an updated refresher of modern slavery training to all employees.	<ul style="list-style-type: none"> <li>Re-circulate modern slavery refresher training</li> </ul>	Complete and ongoing.
Training and Collaboration	Provide ongoing quarterly modern slavery activities for employees, including e-comms training and posters to raise modern slavery awareness.	<ul style="list-style-type: none"> <li>Distribute internal e-comms and educational posters to raise modern slavery awareness in staff.</li> </ul>	Complete and ongoing.
Training and Collaboration	Provide targeted training on procurement and new supplier processes.	<ul style="list-style-type: none"> <li>Deliver training to procurement staff about the updated modern slavery screening process.</li> </ul>	Complete and ongoing.
Training and Collaboration	Providing an internal intranet with links to modern slavery procedures.	<ul style="list-style-type: none"> <li>Establish a centralized 'ESG Hub' intranet page.</li> </ul>	Complete.
Training and Collaboration	Provide a presentation to all staff at internal "Long Table" meetings to raise modern slavery awareness.	<ul style="list-style-type: none"> <li>Host presentation.</li> </ul>	Complete and ongoing.



## Future Commitments

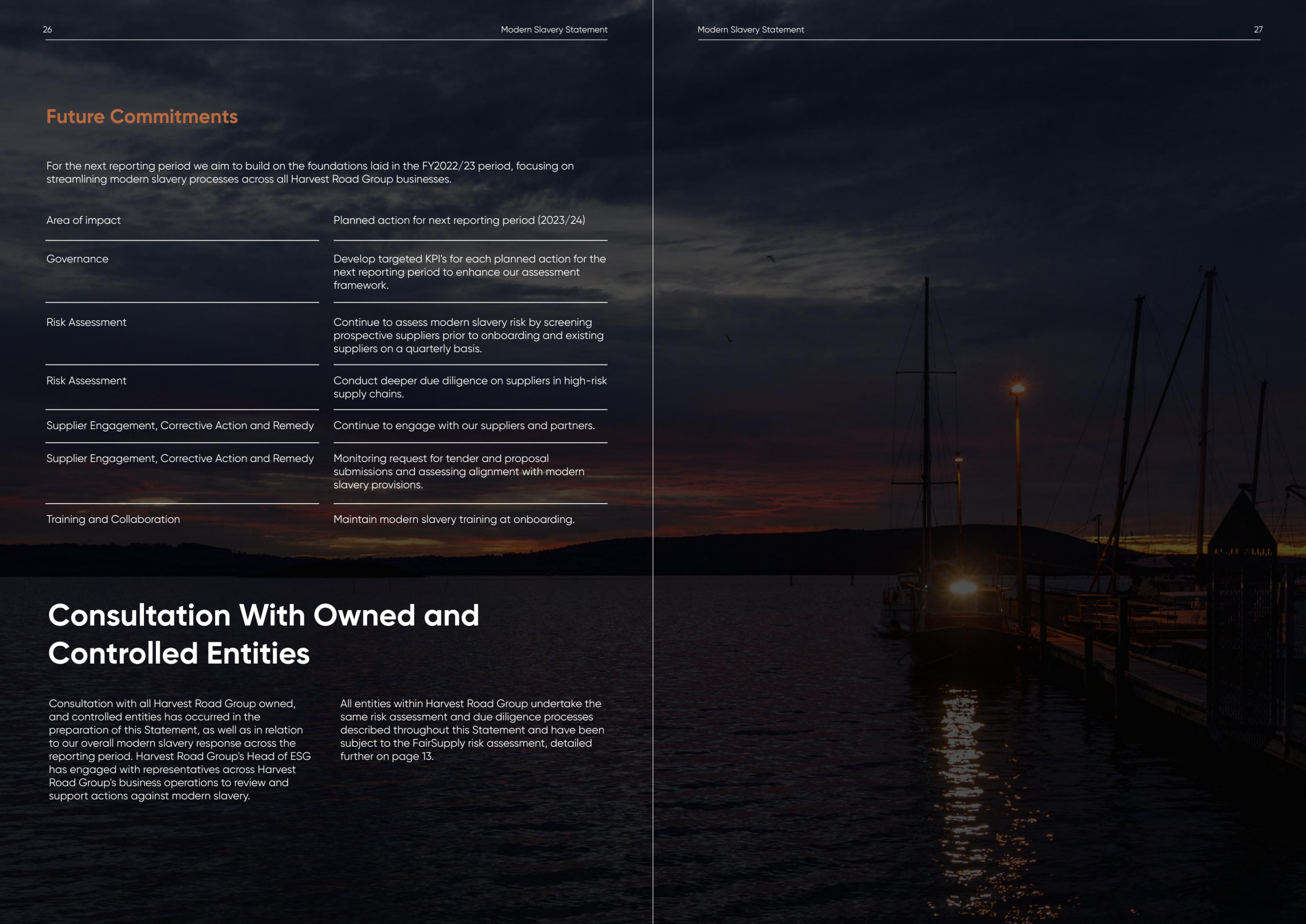
For the next reporting period we aim to build on the foundations laid in the FY2022/23 period, focusing on streamlining modern slavery processes across all Harvest Road Group businesses.

Area of impact	Planned action for next reporting period (2023/24)
Governance	Develop targeted KPI's for each planned action for the next reporting period to enhance our assessment framework.
Risk Assessment	Continue to assess modern slavery risk by screening prospective suppliers prior to onboarding and existing suppliers on a quarterly basis.
Risk Assessment	Conduct deeper due diligence on suppliers in high-risk supply chains.
Supplier Engagement, Corrective Action and Remedy	Continue to engage with our suppliers and partners.
Supplier Engagement, Corrective Action and Remedy	Monitoring request for tender and proposal submissions and assessing alignment with modern slavery provisions.
Training and Collaboration	Maintain modern slavery training at onboarding.

## Consultation With Owned and Controlled Entities

Consultation with all Harvest Road Group owned, and controlled entities has occurred in the preparation of this Statement, as well as in relation to our overall modern slavery response across the reporting period. Harvest Road Group's Head of ESG has engaged with representatives across Harvest Road Group's business operations to review and support actions against modern slavery.

All entities within Harvest Road Group undertake the same risk assessment and due diligence processes described throughout this Statement and have been subject to the FairSupply risk assessment, detailed further on page 13.



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Harvest Road Group Pty Ltd