



MODERN SLAVERY STATEMENT 2022

A joint statement for SunPork Pty Ltd and SunPork Fresh Foods Pty Ltd





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OUR JUST CAUSE: SUNPORK GIVES MORE THEN WE TAKE.

AT SUNPORK WE HAVE A MISSION.

TO PRODUCE GOOD FOOD FOR CONSUMERS WORLDWIDE FROM QUALITY PIGS CARED FOR BY THE BEST PEOPLE IN THE MOST SUSTAINABLE WAY.

AT SUNPORK WE HAVE A VISION.

TO BE AUSTRALASIA'S PREMIER PORK VALUE CHAIN, INTERNATIONALLY RECOGNISED BY CUSTOMERS AND CONSUMERS FOR HIGH QUALITY, COMPETITIVE AND INNOVATIVE FOOD SOLUTIONS.

CEO STATEMENT



I am pleased to present SunPork's third Modern Slavery Statement.

It's one thing to say our pork is a world class sustainable protein choice that tastes great but even better to know that it comes from the best people, the highest quality inputs, and responsible practices and processes. Our commitment to providing the highest standards of welfare and conditions for our employees and our pigs is our highest priority.

As you read this report, I hope you learn more about the progress SunPork is making towards ethical social responsibility and eliminating modern slavery risks from our supply chain.

COVID-19 has had a devastating impact across the globe, but the great pause gave us an opportunity to take stock, check our direction and steer toward a more secure future. If the pandemic has taught us anything, it's that diversification and risk mitigation are key components for success. Have a look at our growing business and logistics network to see how we're positioned to supply pork products to all parts of Australia. While our operations and customers are predominantly domestic, our suppliers span the globe.

Our 'Just Cause' is that 'SunPork gives more than we take'. Part of this is that we continuously strive to ensure employees feel valued, respected and are treated fairly taking home far more than a wage or salary. Our work in modern slavery mitigation means that we are now also extending our Just Cause to our entire supply chain.

The objectives of SunPork's modern slavery initiatives are as follows:

- (a) to combat modern slavery risks in our business and supply chains
- (b) to provide avenues to report risks, and provide assistance and support for victims of modern slavery
- (c) provide for education and training about modern slavery within our business and raise stakeholder awareness within our supply chains, and
- (d) to encourage collaborative action to combat modern slavery.

In 2021-22, together with our business partners, we remained vigilant and continued to take steps to become more effective in identifying, reporting and reducing the risks of modern slavery in its many forms.

This report sets out our work to date and some future commitments to ensure we eliminate any modern slavery from our environments and supply chains.

SunPork believes there is nothing more important than the respect of everyone's fundamental human rights to dignity, equality, and liberty.

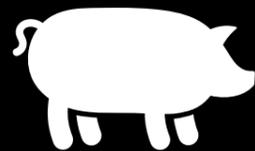
Dr Robert van Barneveld
Group CEO and Managing Director

SUNPORK AT A GLANCE

The SunPork Group of companies is wholly Australian owned by the Queensland based Cameron, Hall and McLean families.

We produce more than 20% of Australia's fresh pork.

We operate 43 Australian farms and 7 ancillary sites in 4 states and 6 New Zealand farms.



We produce 1,100,000 pigs per year.

We have more than 52,000 sows. This means we have at least 550,000 pigs on our farms every day.



Staff 1,100+

We employ more than 1,000 staff in rural and regional communities plus another 100 in the city.



1,700 supermarkets worldwide.

Swickers processes 1.2 million pigs per year or 95% of all Queensland pork production.

1.

IDENTIFY THE REPORTING ENTITY

This Modern Slavery Statement ('the statement') has been developed in accordance with the Commonwealth's Modern Slavery Act 2018 for the financial year ending 30 June 2022 (F22).

With shared supply chains, this statement has been prepared by SunPork Group and is a joint statement for three entities:

1. SunPork Pty Ltd (ACN 059 168 786) and its wholly owned and controlled subsidiaries
2. SunPork Fresh Foods Pty Ltd (ACN 135 230 545) and its wholly owned and controlled subsidiaries
SunPork Pty Ltd and SunPork Fresh Foods Pty Ltd each have a consolidated revenue exceeding \$100M for F22.
3. Swickers Kingaroy Bacon Factory Pty Ltd (ACN 009 678 693) as a member of the SunPork Group

Swickers Kingaroy Bacon Factory Pty Ltd does not meet the consolidated revenue requirement however, as part of the SunPork Group will report voluntarily.

This statement is intended to meet the requirements of section 16 of the Modern Slavery Act 2018 (Cth). It outlines the steps taken by SunPork Group during F22 to seek to minimise the risk of modern slavery occurring in our businesses and supply chains.

To find out more about the nature of our business, you can visit sunporkfreshfoods.com.au

This statement was approved by the Board of SunPork Group including reporting entities SunPork Pty Ltd, SunPork Fresh Foods Pty Ltd and Swickers Kingaroy Bacon Factory Pty Ltd on 8 November 2022.



2.

STRUCTURE, OPERATIONS AND SUPPLY CHAINS

SunPork Group is one of Australia’s largest pork producers and is 100% Australian-owned.

We produce exceptional pork products by controlling the value chain with superior genetics and sustainable farming practices to deliver only the best quality pork for Australia.

We operate 43 Australian farms and 7 ancillary sites in 4 states (Queensland, New South Wales, South Australia, Victoria) and 6 New Zealand farms on two islands. We employ over 1,100+ people, with most staff employed in rural and regional communities across Australia and 2% of SunPork’s animal care staff are proudly on the autism spectrum.

We process 39% of all pigs in Australia across two abattoirs and two value-add facilities. SunPork products are produced and processed in Australia with distribution to domestic and international markets. Annually, we supply 80 million kilograms of pork, including 52 value-add products, distributed to 1,700 supermarkets. In addition, we export 10 million kg of pork to at least seven countries.

Through our own organisation and external supply chains, we source genetic and raw materials, components, and services. Our supply chain comprises the procurement of pork production and processing inputs which are then transformed into SunPork’s three main product categories – pork, genetics and processing by-products.

In F22, the SunPork Group interacted with more than 2,000 external vendors across our supply chain under the following categories:

- Labour and corporate services
- Animal feed and nutrition products
- Animal health products
- Packaging products
- Engineering, construction and fabrication services
- Maintenance spares and services
- Energy and Utilities
- Transport services
- Operations support services
- Marketing and cold-chain distribution services

Our procurement model is both centre-led and decentralised. High volume, high spend category purchases are mostly centre-led, while site-specific purchases are decentralised where subject matter experts hold responsibility for departmental purchases.



3.

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

We are committed to continuously improving our risk identification capability and do this through our Working Group members in consultation with category specialist. SunPork recognises that addressing risks in the supply chain requires a long-view commitment to address risk appropriately over time.

Potential Modern Slavery Risk or Potential indicators of modern slavery	Sectors or Industries at Higher Risk
Internal Supply Chain (Our Operations) <ul style="list-style-type: none"> • Exploitation of migrant workers • Deceptive recruitment • Underpayment of wages • Excessive working hours 	Internal Supply Chain (Our Operations) Functions within SunPork at higher risk: <ul style="list-style-type: none"> • Labour Hire – Farms, processing facilities
External Supply Chain (Our Suppliers) <ul style="list-style-type: none"> • Exploitation of migrant workers • Deceptive recruitment • Underpayment of wages • Excessive working hours 	Internal Supply Chain (Our Suppliers) <ul style="list-style-type: none"> • Grain • Animal nutrition products • Animal health products • Value-add processing ingredients • Clothing • Packaging • Construction • Electronics • Cleaning • Storage and distribution • Transport • Trade services • Security services • Labour Hire



4.

ACTIONS TAKEN IN F22 TO ASSESS AND ADDRESS THOSE RISKS

SunPork Group is a socially responsible business committed to complying with national labour standards and promoting decent work conditions across our business and supply chain.

As a major Australian agriculture and fresh food company, our operations span the entire pork value chain, and while our customers are predominately domestic, our supply chains are global.

We are continuously striving to improve our standing against our Environmental, Social and Governance (ESG) responsibilities, recognising ESG as vital for business performance and stability in food supply chains.

SunPork is aware of the business implications of failing to manage modern slavery risks, as well as the positive effects around reduced business risk, continuity of operations, access to markets and increased worker productivity. As a result, we intend to create impactful change that leaves a lasting legacy for the business and the communities we operate within.

For these reasons, SunPork is taking a measured approach – the business understands that the complex nature of modern slavery means:

(i) realising down-chain impacts requires commitment, and

(ii) we cannot solve it in isolation from our suppliers. Yet, whilst we are committed to addressing ethical operations and ethical trade in our supply chains, our actions must be meaningful to be sustained long-term and aligned with our Group's vision, mission and values.

Getting the foundation principles right remained our focus in F22 alongside actions to identify and mitigate any in-house risk. Notably, we commenced shifting our focus from internal to external risk assessment, where we piloted a survey approach with our agency labour suppliers. We sought feedback on the process and F23 activities will see a concerted effort to identify and assess supply chain risks in priority vendor groups.

The United Nations Guiding Principles are the global standard of practice and have provided us with a blueprint for SunPork to manage the risk of adverse impacts on human rights. Adoption of the guidelines commenced in F22 and will continue in the coming years.

ACTION 5:

Responsible Contractor Management & WHS Process

SunPork is committed to providing a quality, safe and sustainable workplace. Following the new appointment of a SunPork Group Workplace Health and Safety Manager in F22 we initiated a review to align our workplace health and safety (WHS) practices across the SunPork Group.

As part of the SunPork contractor induction process, contractors may be required to demonstrate their commitment to human rights in their business and supply chain. Where applicable, we will request a copy of their Modern Slavery Report. These changes will take effect in F23 following the launch of the Group-wide contractor induction process.

ACTION 6:

Employee Accommodation Policy and Procedures

SunPork operates more than 40 farm sites across regional and rural Australia. Following a review of housing facilities provided to employees by SunPork, a Group-wide housing policy was developed and implemented across all farming operations.

In F22, an internal procedure for delegating housing assets to employees was launched, including a suite of tenancy templates and guidelines aligned with respective state and territory tenancy authorities.

A uniform policy and procedural framework for the delegation and management of housing facilities that is fair, equitable and transparent to employees assists us in eliminating any potential risks of exploitation before they happen.

ACTION 7:

Human Ethics – continued participation in human rights reporting and assessments

Through members of our internal supply chain, we reported under (i) Sedex Members Ethical Trade Audit (SMETA), and (ii) Intertek Social Accountability audit which requires us to demonstrate our commitment to respecting human rights in our operations and we have successfully demonstrated compliance in Australia.

ACTION 8:

Employee Assistance Program (EAP)

We announced the impending launch of a SunPork Employee Assistance Program (EAP) through Converge International.

Converge is Australia's largest and most experienced mental health and well-being solutions provider. They provide eight streams of employee assistance programs – for all employees and family members, career, money management services, lifestyle and nutrition, and legal assistance.

Additionally, they provide crisis counselling, critical incident support and onsite support. Converge has a tiered support framework where they provide psychologists, counsellors and social workers depending on the support needed for the employee. In F23 the service will be available for all employees and direct family members.

ACTION 9:

Superannuation Review

A full review of the application of the Superannuation Guarantee levy requirements was conducted in conjunction with external advisors to ensure that SunPork is fully compliant across the Group.

ACTION 10:

Corporate Policy Development

Following the United Nations Guiding Principles on Business and Human Rights, SunPork continues to strengthen Group-wide internal policies and procedures, including:

Child Labour Policy (F22)
Version 1.0

Policy Owner: Chief Executive Officer

Date Last Reviewed: 21/12/2021

Sunpork is committed to respecting human and subsequently children's rights. We acknowledge that every child has the right, among others, to a healthy and safe environment with access to education, play and recreation, an adequate standard of living and to be protected from abuse and harm. SunPork does not tolerate child labour in any area of our operations and does not tolerate children being exposed to risks in production and processing sites used for our products. Our Child Labour Policy is available to all employees, applies organisation-wide, and extends to our suppliers and contractors. It is based on:

- The United Nations Convention on the Rights of the Child (UNCRC).
- International Labour Organisation (ILO) Conventions.
- The Children's Rights and Business Principles.
- Child Employment Acts and Regulations in the states and territories that SunPork operates.

The Policy includes remediation steps in the event of a suspected underage worker and a reporting point of contact – the SunPork Group Stop Line. The Policy will be reviewed and updated annually to ensure compliance with laws and regulations.

Other policies were also launched in F22 including SunPork's Parental Leave Policy, Flexible Work Policy, and Fatigue Management Policy.

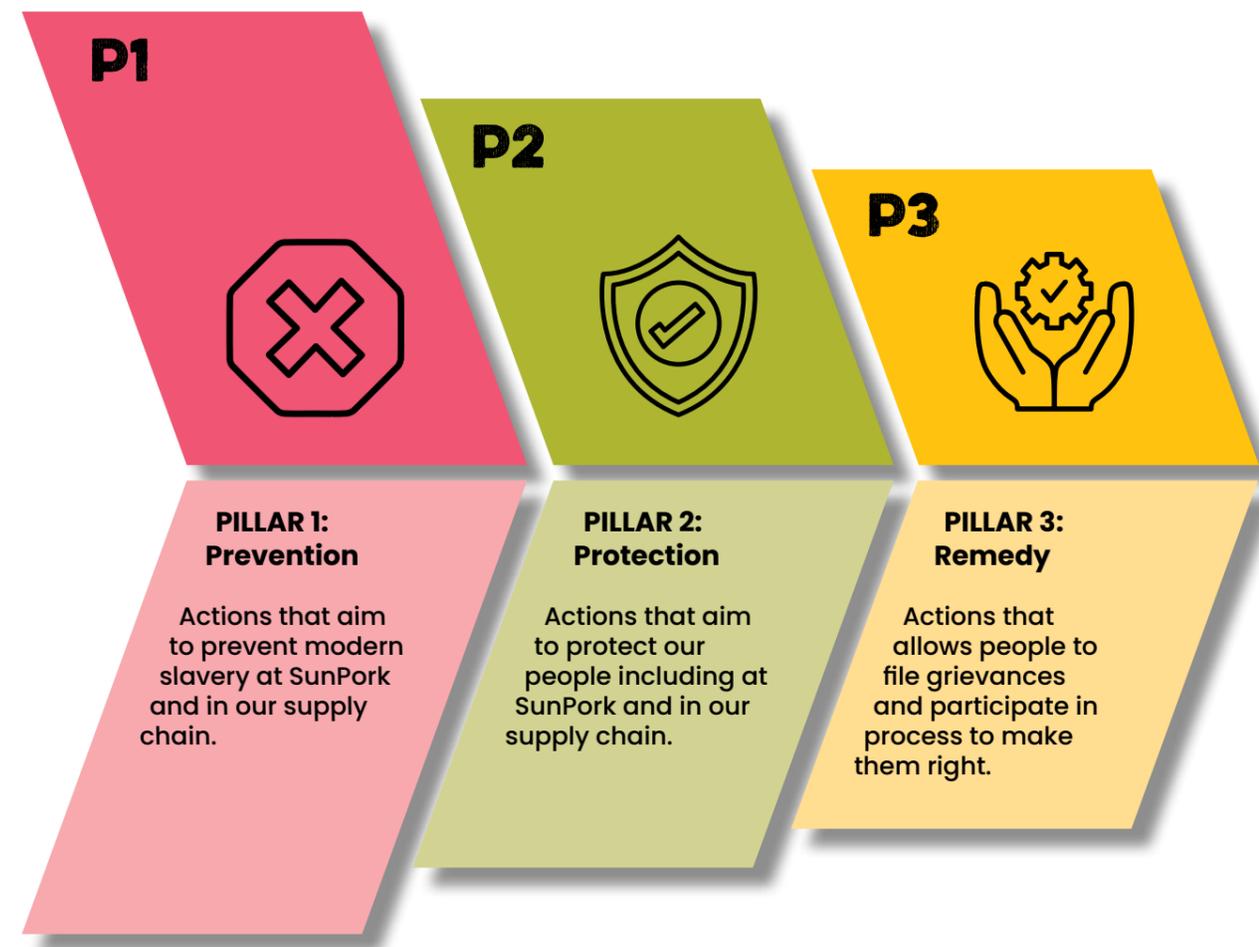
**SUNPORK
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SOCIALLY
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5.

ASSESSING THE EFFECTIVENESS OF ACTIONS

SunPork is committed to developing effective measures to assess the progress and effectiveness of our modern slavery program. We acknowledge that the success of our modern slavery program will be dependent on how we measure the implementation of our planned programs of work and our ability to refine our approach, as necessary.

Our actions are structured into three broad pillars:



	F22 ACTION	METRIC
Pillar 1	Formation of a SunPork Working Group - Modern Slavery.	<ul style="list-style-type: none"> Number of Meetings Planned versus actual activities implemented.
Pillar 1	Analysis of priority vendor groups commenced.	<ul style="list-style-type: none"> Identification of vendor priority groups by SunPork's Working Group - Modern Slavery.
Pillar 1	SunPork Slavery & Trafficking Risk Template (STRT) Survey Pack developed with implementation commenced.	<ul style="list-style-type: none"> Vendor response rate and quality of responses. Pilot trial feedback.
Pillar 1	SunPork staff training program - pilot launched to human resources team.	<ul style="list-style-type: none"> Number of staff trained across: <ol style="list-style-type: none"> Training sessions and discussion STRT completion
Pillar 1	Adoption of the Supply Chain Sustainability School e-learning modules.	<ul style="list-style-type: none"> Number of staff who completed the e-learning module.
Pillar 1	Continued participation in human rights reporting and assessments (e.g Sedex SMETA, Intertek).	<ul style="list-style-type: none"> Number of human ethics related conformances and non-conformances. Number of non-conformances resolved within the prescribed period.
Pillar 2	Corporate policy development - Child Labour Policy.	<ul style="list-style-type: none"> Broad-approved policy. Policy Launched.
Pillar 2	Discussions about inclusion of modern slavery checks in the SunPork Contractor Management Process and WHS Policy.	<ul style="list-style-type: none"> Steps taken toward implementation. F23 - modern slavery check process is embedded into contractor onboarding process.
Pillar 2	Employee accommodation policy and procedures.	<ul style="list-style-type: none"> New policy launched. Updated rental agreement and guidelines issued at employee hire (where relevant).
Pillar 3	Announcement of SunPork Employee Assistance Program through Converge International - providing psychologist, counsellors and social workers depending on the support needed for the employee.	<ul style="list-style-type: none"> Announcement to staff. Identification of an EAP provider that could be contracted by all staff regardless of the accessibility and geographical constraints faced by employees.

These metrics will be reported on a regular basis to the SunPork Working Group - Modern Slavery (which includes senior executives). We intend to review and refine our approach periodically to consider any emerging modern slavery risks.

6.

CONSULTATIVE PROCESS ACROSS SUNPORK GROUP

We are developing and implementing consultation mechanisms which encourage cooperation and engagement of employees and management.

In F22, SunPork Group continued the development and implementation of internal initiatives across our operations that aid in identifying potential risks of modern slavery. These initiatives are being developed in consultation with SunPork Group stakeholders.





**GOOD FOOD.
QUALITY PIGS.
BEST PEOPLE.**

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