

Modern Slavery Statement for CY 31 December 2023

Introduction

Modern Slavery Statement submitted by G & K O'Connor Pty Ltd, Pakenham ACN 005 934 029 under the Commonwealth's Modern Slavery Act 2018.

The statement covers the activities of G & K O'Connor for CY 31 December 2023 in understanding and defining actions designed to minimise the risk from occurrence of modern slavery in our operations and supply chain.

Modern slavery is a term used to describe serious exploitation. It relates to situations where coercion, threats or deception are applied to exploit individuals and undermine their freedom through practices such as human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and child labour.

1. About G & K O'Connor

G & K O'Connor is an integrated, single species (beef-only) export meat processing enterprise near the township of Pakenham, approximately 60km south east of Melbourne, Victoria.

The business sits in a semi-agriculture area on a 140-hectare site. The business consists of a built area of 10 hectares in the centre of the site for raw beef processing, rendering and administration. This is the sole enterprise operated by G & K O'Connor Pty Ltd.

First constructions at the site were made by Kevin and Gary O'Connor in 1978 with first meat operations commencing approximately 40 years ago with the granting of export registration by the then Commonwealth Department of Primary Industry. Additional investments have been made in meat processing facilities over time to expand the scope of operations at the site. Today, the enterprise is owned and operated as a local private business by the O'Connor family for the manufacture of premium carton beef for supply to national and global marketplaces. Export destinations include countries in East Asia, South East Asia, the Middle East, the Americas and Europe.

2. Our Business, Operations and Supply Chains

G & K O'Connor manufactures packaged raw beef in chilled and frozen form for a worldwide customer base. Cattle are processed at the site and the beef packaged into cartons for distribution by road, sea and air. All beef manufactured by G & K O'Connor is derived entirely from cattle processed at the site.



All raw beef produced by G & K O'Connor is in the form of a single ingredient product line. There are no additives, processing agents or preservatives of any kind used in the production of the beef. All cattle processed by G & K O'Connor are Australian born and raised.

The business employees around 450 personnel in total. Of these, approximately 410 directly participate in processing activities with the remainder involved with other activities such as administration, stock acquisition and maintenance. All activities associated with the business are conducted at the Pakenham site as part of single integrated enterprise.

The entire operations of the business are, for the most part, self-sufficient and performed in-house by G & K O'Connor. The use of contractors is limited to individuals or businesses with specialist skill sets engaged where necessary in support of in-house expertise.

The processing facility at G & K O'Connor is registered for export by the Commonwealth Department of Agriculture, Fisheries and Forestry ("the Department"). Full time technical officials of the Department supervise and audit the operations at the site in a multi-tiered regulatory structure designed to meet the international certification requirements of importing country authorities. Additionally, managers and staff engaged in export certification have been assessed as fit and proper persons by Departmental processes as part of statutory requirements for export eligibility.

G & K O'Connor is a major supplier to the global trade in raw meat to multinational chains and a partner to international corporate protocols against modern slavery over some years. As part of these arrangements, the business is subject to exacting, detailed third party audit regimes for verifying compliance at the site in relation to practices such as conditions of employment, wages and human rights to these high international standards. These audits, designed to determine social accountability and best practice corporate citizenry, are conducted regularly and at least annually. The scope of these audit regimes strongly transects with the ambitions of the Modern Slavery Act.

G & K O'Connor operates under a mature quality assurance program that commits the business in its Quality Statement, inter alia, to:

- The nurturing of a quality culture and team environment through values of mutual respect, honesty and ethical behaviour;
- **4** A strong system of supply chain relationships and traceability.

All cattle processed by G & K O'Connor are born and raised in Australia. The cattle supply chain is direct and short. The cattle are sourced straight from farms or feedlots mostly in Victoria, south eastern South Australia and southern New South Wales. A percentage of cattle for processing is sourced through local auction sales. As well, the business provides custom processing for specialist exporters, mostly with their own integrated cattle supply chains.

Processing materials include packaging components, such as films, wraps and fibreboard cartons, and processing supplies. These materials are sourced directly from recognized reputable manufacturers (and distributors) that are part of the G & K O'Connor approved supplier list (and have been over



decades) and have publicly available modern slavery statements. General consumables and office supplies are sourced from local retailers.

On site services such as inspection services, quality assurance schemes, and third-party auditing, are provided by the Commonwealth as well as by quasi regulatory industry organisations such as Meat & Livestock Australia and Aus Meat.

3. Our Policy Framework

G & K O'Connor have in-place a number of policies to ensure the business is conducted in an ethical and transparent manner. These include:

- Social Accountability. This policy provides foundational standards of conduct for all aspects of the business. These standards include, inter alia, freedom of movement; freedom of association; freedom from harassment and discrimination; prison reform labour; young employees; minimum wages and conditions; and training.
- **2.** Business Integrity and Ethics. This policy provides standards for transparency; dealing with corruption; conflicts of interest; and freedom for whistleblowers.
- **3.** *WorkPlace Behaviours*. This policy provides for code of behavior at site; preventing inappropriate behavior of any kind; and reporting any such inappropriate behavior.
- **4.** *Managing WorkPlace Complaints and Grievance Procedure.* This policy provides the pathways for managing complaints and grievances.
- **5.** *Purchasing.* This policy provides for the approval of suppliers, assessment of suppliers; supplier questionnaire and audit; evaluation of goods upon receipt.

4. Risk Assessment Methodology

Risk assessments are undertaken at G & K O'Connor in accordance with international food standards in evaluating the legality, safety and integrity of raw materials and finished goods. The same methodology has been adopted for application to modern slavery

4.1 Risk Rating

A simple risk rating framework based on high, medium and low relevance (potential) was developed for categorising the range of elements that comprise modern slavery. The aim was to provide an initial picture as to how these elements may relate to this business and supply chain. The risk rating is meant to be dynamic and, as time progresses with greater experience and additional information, this rating may change.



High Relevance Debt Bondage Medium Relevance Forced labour Servitude Low Relevance Human Trafficking Forced marriage Child labour Slavery

4.2 Risk Assessment

An assessment is made of the likelihood of occurrence of modern slavery practices against the likelihood of detection of slavery practices using a simple quadratic model. The model identifies the level of risk as high (red), medium (orange) and low (green). A red risk rating means immediate action is needed with regular monitoring to mitigate risk; an orange risk rating could mean action is necessary, with occasional monitoring to mitigate the risk.

The quadratic model is presented below:

	LIKELIHOOD OF OCCURRENCE					
	Very unlikely	Unlikely	Fairly likely	Likely	Very likely/ certain	
Very likely/ certain						
Likely						
Fairly likely						
Unlikely/remote						
Very unlikely						

5. Assessment & Mitigation

5.1 Our Operations

The likelihood of occurrence is assessed *very unlikely*. Key factors in this rating are:

- The operations of the business are guided by a strong policy framework to protect against modern slavery;
- The prevailing culture of the business is built upon values of honesty, respect and integrity. The culture is reflected in the multicultural composition of a stable workforce at the site and the worldwide market access the business has achieved;
- All employees of the business irrespective of residency status must meet the same recruitment and induction processes, including training;



There are established mechanisms for communications with and consultation across the workforce.

The likelihood of detection is assessed *very likely*. Key factors in this rating are:

- The operations of the business are entirely transparent with full time government officials monitoring and supervising activities throughout the production day supported by an overarching audit regime by government.
- Modern slavery risks are subject to regular independent third-party audits over years as part of approval processes for international supply chains, as well as second party commercial audits to confirm compliance with anti-slavery measures.

5.2 Supply Chains

The likelihood of occurrence is assessed *unlikely*. Key factors in this rating are:

- Cattle acquisition is through well-established and enduring supply arrangements with producers, saleyards, feedlots and exporters built up over years and often decades with well-developed personal relationships and direct knowledge of the farm, saleyard or feedlot, including enterprise visits.
- Saleyards are historically owned and operated by local government. Recent private sector investment into saleyards reflects the reluctance of local government to fund further development and modernization of these facilities. Saleyards are subject to tight controls through local government approvals, Departments of Agriculture requirements for animal welfare and animal health controls, and environmental protection agencies. The type of work at these facilities requires skill and experience. Operations are conducted in public view under the direct surveillance of producers, agents, and processor representatives. All cattle purchases by G & K O'Connor from saleyards are made by professional cattle buyers employed by the business.

The likelihood of detection is assessed *likely*. The factors in this rating are:

- All source enterprises are accredited with respective Agricultural Departments, have unique property identification codes and are subject to animal health, welfare and identification programs of respective States.
- All source farms & feedlots participate in industry-based accreditation schemes that include third party audit.
- All cattle are purchased within the context of specific production goals, often in a planned sequence over a 2-to-3-year cycle to delivery of the finished product.
- All cattle purchases, arrival and processing schedules, and shipping times are carefully scheduled to coincide with these specific production goals.



- All cattle are physically examined prior to slaughter, are individually scanned to confirm life time traceability at the time of arrival at the establishment and the accreditation status of the last property of origin confirmed.
- Stock transport for carriage of the cattle from the saleyard, farm or feedlot to the abattoir is provided by the producer or through preferred carriers.

It is recognised that whilst the above measures within supply chains may mitigate potential risks of modern slavery, they do not guarantee elimination of risks altogether.

6. Future Actions

A key priority is the continuing acknowledgments of the potential for modern slavery.

Activities for CY 2024:

- 1. Review risk categories across the elements of modern slavery and undertake further risk assessment activities;
- 2. Assess benefit for standalone modern slavery policy in addition to existing policy framework;

7. Governance and Accountability

The risk assessment is a formal process at G & K O'Connor and an integral part of the internal accreditation process. The risk assessment team is codified within the approved arrangement for export certification with the Department. The outcomes from risk assessment are subject to scrutiny through senior management review.

8. Collaboration

The operations for G & K O'Connor are conducted at a single site. The business is a member of the relevant industry association and receives regular communications from the industry association on all matters relating to the Australian red meat industry.

Additionally, the all-embracing regulatory overlay imposed by Federal and State governments at the site ensures a continuous dialogue with these bodies in the determining and assessing the delivery of transparent labour standards within agreed frameworks with government, sustained compliance against statutory provisions across export certification standards on hygiene and integrity, as well as social accountability standards across various international commercial standards. The communications flow necessary to sustain these high levels of dialogue across this broad range of interfacing parties and standards is enormous.



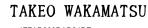
This statement was approved by the board of G & K O'Connor Pty Ltd in their capacity as the principal governing body of G & K O'Connor Pty Ltd on 3rd December 2024.

-Signed by: Matt O'(onnor Matthew O'Connor Director 16th May 2025

Tim O'(SULTON Tim O'(SULTON TIMOTHY O'CONNOR Director 16th May 2025

Signed by: Christopher O'Connor CD56FC17A924406... Christopher O'Connor

Christopher O'Conno Director 16th May 2025 DocuSigned by:



Takeo Wakamatsu Director 16th May 2025

Contact: Andrew Muller 03 5941 2033

G & K O'Connor Pty Ltd 940 Kooweerup Road Pakenham Victoria 3810 ACN 005 934 029

March 2024

G & K O'Connor Pty Ltd ABN: 49 005 934 029 **ACN:** 005 934 029

Board Meeting

Date:3rd December 2024Time:11.00amLocation:Pakenham, Victoria/ Online via video link

Board members in attendance:

Timothy O'Connor	- Director
Matthew O'Connor	- Director
Christopher O'Connor	- Director
Takeo Wakamatsu	- Director

Apologies:

Nil

Agenda:

1. Annual Modern Slavery statement

The annual modern slavery statement was presented to the Board of Directors as the principal governing body for G & K O'Connor Pty Ltd, ACN: 005 934 029 for approval and endorsement.

The statement as presented to the Board is included at Attachment 1.

The statement was assessed to ensure it addressed all the mandatory criteria under the *Commonwealth Modern Slavery Act 2018* (the Act).

Mandatory criteria		Page number/s
a)	Identify the reporting entity	1
b)	Describe the reporting entity's structure, operations and supply chains	1-2
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity it owns or controls	2-6
d)	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.	2-6
e)	Describe how the reporting entity assesses the effectiveness of these actions.	4-6
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Do not own or control any other entities.
g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	

Assessment of the statement concluded that it was a compliant and thorough assessment of the risks associated with the business, operations and supply chains pertinent to Modern Slavery at G & K O'Connor Pty Ltd.

Motion:To approve the Modern Slavery statement for G & K O'Connor Pty Ltd,
ACN: 005 934 029 as presented at Attachment 1.Motion By:Timothy O'ConnorSeconded By:Matthew O'ConnorCarried.Carried.

Modern Slavery statement was later signed by Timothy O'Connor, Matthew O'Connor, Christopher O'Connor and Takeo Wakamatsu as responsible member/s of the Board of Directors for submission to the Attorney-General's Department (AGD) through the Online Register for Modern Slavery Statements (Online Register).

Meeting Closed: 12.00pm



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This statement was approved by the board of G & K O'Connor Pty Ltd in their capacity as the principal governing body of G & K O'Connor Pty Ltd on 3rd December 2024.

Matthew O'Connor Director 3rd December 2024 Timothy O'Connor Director 3rd December 2024

Christopher O'Connor Director 3rd December 2024 Takeo Wakamatsu Director 3rd December 2024

Contact: Andrew Muller 03 5941 2033

G & K O'Connor Pty Ltd 940 Kooweerup Road Pakenham Victoria 3810 ACN 005 934 029

March 2024