

# **MODERN SLAVERY STATEMENT FY2022**

This is the third Modern Slavery Statement to be issued by Consolidated Pastoral Company Pty Ltd ("CPC") in accordance with the *Modern Slavery Act 2018* (Cth) and applies to the financial year ending 31 March 2022.

CPC is committed to operating responsibly and upholding fundamental human rights and recognises the need to identify and assess modern slavery risks within business operations and the supply chain. We undertake to work with our team at CPC, our customers and suppliers to understand and minimise the risk of modern slavery.

## **1. Our Business**

CPC is a leading Australian managed, UK owned Agribusiness with strong ESG values. CPC owns and operates a portfolio of nine station aggregations in Australia and two feedlots in Indonesia. Across more than 3.2m hectares of land, the CPC team can care for more than 300,000 head of cattle and produce a diverse range of crops. With an asset base in excess of AUD\$1 billion, CPC supplies a variety of domestic and international customers.

Our history goes back to 1860 and our CPC agricultural property portfolio was first consolidated as a company in Australia in 1983.

The company also holds a 90% interest in PT Juang Jaya Abdi Alam (JJAA) which owns and operates two feedlot businesses in Indonesia, the other 10% being owned by our Indonesian Joint Venture partner.

## 2. Structure at 31 March 2022

In October 2020, CPC was purchased by Guy and Julia Hands through the Hands Family Office. Terra Firma (UK) (owned by Guy Hands) is the investment manager of CPC for the Hands Family Office.

CPC Group Holdings Pty Ltd is the Australian parent company of several controlled entities in Australia including CPC. A full listing of the controlled entities is included at Annexure A. CPC is responsible for the operations of the business in Australia and the other controlled entities in Australia exist only for historical reasons. JJAA is responsible for business operations in Indonesia. For the purpose of this report, "CPC" refers to all businesses within the group.

#### **Operations and Supply Chain**

The CPC Australian operations are located across northern Australia with 9 cattle station aggregations which breed and grow beef cattle and a diverse range of crops. CPC has commenced a program of emissions reduction and carbon capture that is integrated into its business operations.

The administrative office is based in Brisbane, Queensland. CPC Australia is very customer focused with its direct sales channels primarily involving selling cattle and beef to Asian consumer markets, domestic feedlots or processors, and exporting live cattle. In FY2023 CPC will be selling its first commercial cotton crop.

The Hands Family Office has strong growth aspirations for the business. Their vision is to continue evolving the business beyond the cattle and cropping operation to one which makes greater use of our land, and to take advantage of opportunities including further emissions reduction and carbon capture, renewable energy and biodiversity.

The feedlots in Indonesia are located in Lampung (South Sumatra) and Medan (North Sumatra). The Lampung feedlot has an optimal capacity of 19,800 head, while the Medan feedlot has a capacity of 7,200 head; both facilities are "best in class" operations. Cattle are sold from these feedlots to customers who process the cattle. We maintain strong links through the supply chain from feedlot to market with animal welfare and marketing offices visiting customers and processing facilities daily.

Further information on operations available at: www.pastoral.com

## 3. Risks of Modern Slavery Practices in Our Operations and Supply Chain

#### **Our operations**

We believe that our CPC team employed in Australia and Indonesia are at a low risk to modern slavery and consider that our HR processes, Code of Conduct and company policies further mitigate this risk. Accordingly, we believe that our greatest risk of involvement in modern slavery is being indirectly linked to it through our supply chain relationships.

#### Supply Chain

We have worked with our suppliers to continue our risk review of the CPC supply chain and identify possible exposure to modern slavery activities. We recognise that the due diligence of these suppliers is important; we aim to do business with like-minded businesses who share our values and are ethically and socially responsible.

Within the CPC supply chain, we have identified product and services risk and geographic risk as the more likely sources of exposure to modern slavery with the supply of materials and products coming from countries with a higher modern slavery risk profile. Examples include the supply of inputs used in cattle supplementary feeds coming from countries with a higher prevalence of modern slavery or other human rights violations, or contract labour hire for services provided to CPC operations which may have unfavourable employment practices.

CPC has diversified into cropping including cotton production, with our first commercial cotton harvest occurring in FY2023. We will be broadening our supply chain enquiries to consider modern slavery risks within our cotton supply chain.

We also note that the lack of supply chain traceability and transparency creates a risk with the degree of integrity to meet acceptable practices at lower levels in the chain.

## 4. Our Actions Taken to Assess and Address Modern Slavery Risks

#### Corporate Governance

CPC has a culture of strong corporate governance, with a focus on our Environmental, Social and Governance (ESG) commitments and goals. One of CPC's Social goals is to work with our team at CPC, our customers and suppliers to understand and minimise the risk of modern slavery.

CPC recognises Sustainable Development Goal (SDG)Target 8 - 'Decent Work and Economic Growth' which highlights the importance of modern slavery internationally in SDG Target 8.7 – 'Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025, end child labour in all its forms'

CPC has a comprehensive policy framework and operating procedures in place to ensure that our employees and contractors clearly understand our expectations plus also provide them with our commitments to how they will be treated at CPC. Our corporate policies are on a regular review cycle and presented to our Boards for approval as part of the review process. In FY2023 we will be developing the CPC Anti Modern Slavery Policy to support our existing policies.

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Policy/Procedure	Purpose
Code of Conduct	Outlines a minimum set of standards and behaviour required of all CPC Employees, Contractors and Directors.
Anti-Bribery Policy	Affirms that CPC has never tolerated, and will not tolerate, any form of bribery and corruption within its business.
Anti-discrimination, Bullying and Harassment Policy	Outlines the relevant definitions, principles and obligations in relation to unlawful discrimination, bullying and harassment, as well as CPC's expected standard of conduct in these areas.
Whistleblower Policy	Encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving CPC and provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.
Recruitment and Selection Policy	To make certain that the recruitment and selection processes conducted by CPC are efficient, robust and delivered in a manner that ensures candidates are treated fairly, equitably and in a manner that is consistent with legislative requirements and stakeholder expectations.
Enterprise Agreement	Over 60% of the Australian team are covered by an Enterprise Agreement. Renewed in June 2021, the current agreement achieved 100% vote of support from employees.

#### **Contractors/Service Providers**

During FY2022 CPC began the implementation of an online contractor induction and evaluation process. This is strengthening our contractor process. The online induction requires that contractors confirm that they comply with all relevant employment law and workplace health and safety legislation.

#### **Our CPC team**

CPC's team of employees consists of approximately 140 employees in Australia, all engaged by employment contracts and approximately 140 full time employees and 480 part time and contract employees in Indonesia who are engaged by employment contracts or negotiated agreements. The HR and payroll team ensures compliance to the Consolidated Pastoral Company Enterprise Agreement 2021 and employment contracts.

#### **CPC Team Training**

During FY2022 we had planned to provide modern slavery training to 100% of the Executive and Senior Management Team (including procurement). Due to COVID-19 impacts, this training was delayed, occurring in October 2022. The training session is designed to educate on issues including modern slavery practices, key risks, reporting requirements, identifying instances of modern slavery and how to report suspected instances.

CPC is proud to develop each individual in our team, with a strong focus on leadership development and health and wellness programs for the Australian and Indonesian CPC team.

#### Suppliers

During 2022, CPC issued self-assessment questionnaires to 100% of CPC suppliers of high-risk products particularly where there is the geographic risk due to overseas sourcing of products and materials. In some cases COVID 19 has impacted the sourcing of these materials and complicated the risk review process. We received an 88% completion rate of the self-assessment questionnaires, and our evaluation of these responses has provided further information of our supply chain processes regarding modern slavery.

Into FY2023 we will review supplier contracts for the inclusion of modern slavery clauses and will be developing a Supplier Code of Conduct during 2023. Suppliers will be provided with a copy of the approved Supplier Code of Conduct once it has been approved by the board of CPC.

### **5. Measuring Our Effectiveness**

At CPC, as our modern slavery framework matures we will continue to review and report on the effectiveness of actions being taken to identify and assess modern slavery risks within our business operations and the supply chain. This review will occur through our risk management and assessment process, policy reviews, supply chain disclosures, site visits and team engagement and training. Reporting will be included in the annual Modern Slavery Statement issued by CPC.

## 6. Consultation with Our Controlled Entities

Within the Australian entities listed at Appendix A, only one entity is an employer and undertakes operations, being Consolidated Pastoral Company Pty Ltd, therefore consultation was not required with the other entities. All Australian entities share the same Company Secretary who has been involved in the preparation of this statement.

Our international subsidiary, JJAA has been consulted in the preparation of the statement and Directors of JJAA have knowledge of this statement. We have discussed with JJAA the details of the Modern Slavery Act 2018's reporting requirements and have provided information on the actions we take to address these requirements and have provided JJAA with relevant materials and training.

## 7. Our Commitment

At CPC, we have a company commitment to leave the world a better place. We undertake to continue to develop and improve our modern slavery framework to advance our ability to identify and manage modern slavery risks within our business operations and the supply chain.

CPC is committed to working collaboratively with our suppliers, customers, employees and external stakeholders to increase our understanding of modern slavery risks and how we can address them.

This statement is our third Modern Slavery Statement, being for the financial year ending March 2022 made pursuant to the Modern Slavery Act (2018). It has been approved by the board of CPC Group Holdings Pty Ltd in their capacity as principal governing board of CPC Group Holdings Pty Ltd on 27 February 2023.

Signed in accordance with a resolution of directors.

Troy Setter Director and CEO

Dated 27 February 2023

## Annexure A

## Wholly Owned Subsidiaries of CPC Group Holdings Pty Ltd (ACN 644 449 758)

#### **Registered office:**

Newcastle Waters Station, Drovers Drive, Newcastle Waters, Northern Territory, Australia 0862.

Company Name	ACN
Baines River Cattle Company Pty Ltd	009 603 516
Consolidated Pastoral Company Pty Ltd	010 080 654
Consolidated Pastoral Group Pty Ltd	644 450 457
Consolidated Pastoral Property Pty Ltd	009 624 159
CPC (China) Pty Ltd	153 136 951
CPC (SE Asia) Pty Ltd	604 035 225
Crosswalk Pty Ltd	009 448 739
Lake Woods Acquisitions Pty Ltd	134 353 192
Lake Woods Group Pty Ltd	134 352 104
Lake Woods Holdings Pty Ltd	134 351 134
Laverton Nominees Pty Ltd	009 639 623

## **International Subsidiary**

Company Name	<b>Country of Registration</b>	Company Number
PT Juang Jaya Abdi Alam	Indonesia	8120 20372 2061

