



TOP CUT FOODS PTY LIMITED

ABN 96 628 117 564

MODERN SLAVERY STATEMENT

Reporting period: 1 July 2025 – 30 June 2026

This statement is made under section 13 of the Modern Slavery Act 2018 (Cth).



About this statement

This Modern Slavery Statement is made by Top Cut Foods Pty Limited (ABN 96 628 117 564) (“Top Cut Foods”, “Top Cut”, “we”, “our”) under the Modern Slavery Act 2018 (Cth) (the “Act”) for the financial year ended 30 June 2026. It describes the actions we have taken to assess and address the risks of modern slavery in our operations and supply chains.

The table below maps this statement against the mandatory reporting criteria in section 16 of the Act.

Mandatory criterion (s 16, Modern Slavery Act 2018 (Cth))	Section of this statement
1. Identify the reporting entity	Section 1
2. Describe the entity’s structure, operations and supply chains	Section 2
3. Describe the risks of modern slavery practices in the operations and supply chains of the entity and any entities it owns or controls	Section 3
4. Describe the actions taken by the entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Section 4
5. Describe how the entity assesses the effectiveness of those actions	Section 5
6. Describe the process of consultation with any entities the reporting entity owns or controls	Section 6
7. Any other information that the reporting entity considers relevant	Section 7

1. The reporting entity

The reporting entity covered by this statement is Top Cut Foods Pty Limited (ABN 96 628 117 564), a proprietary company limited by shares, incorporated in Australia, with its head office at 18 Motorway Circuit, Ormeau, Queensland 4208.

Top Cut Foods Pty Limited is the sole reporting entity for the Top Cut group. This statement also covers the entities Top Cut Foods owns or controls, listed in section 2. None of those entities independently meets the \$100 million consolidated revenue threshold, and none is a separate reporting entity under the Act.

2. Our structure, operations and supply chains

Structure

Top Cut Foods is an Australian food business established in 1981. Since December 2025, Top Cut Foods has been part of the Arcus Foods group (see section 7). Top Cut Foods Pty Limited is the principal operating entity of a consolidated group that includes the following entities, each a separate company:

- Services of Top Cut Foods (NSW) Pty Limited
- Services of Top Cut Foods (QLD) Pty Limited
- Services of Top Cut Foods (SA) Pty Limited
- Services of Top Cut Foods (VIC) Pty Limited
- Services of Top Cut Foods (WA) Pty Limited

These are service and employment entities: they employ the group's workforce in their respective states and provide those services to the group's operations. They do not trade independently.

In FY2026 the group employed approximately 240 people and generated aggregate consolidated revenue of approximately \$165 million.

Operations

Our core business is the butchering, portioning, processing and distribution of meat, meat-based and value-added food products for foodservice, hospitality and retail customers across Australia. Our brands include Top Cut, Tender Plus, Gippsland Fresh, High Country Pork, Kurts Smallgoods, Crestwick, Laneway Street Food Co and Caterfare.

We operate processing and distribution facilities at Ormeau (head office) and Currumbin in Queensland, Newcastle and Sydney in New South Wales, and in Victoria, South Australia and Western Australia. Our workforce comprises directly employed staff (weekly and monthly), supplemented by labour hire workers engaged through third-party providers, particularly in production roles.

Supply chains

Our key supply chain inputs include:

- livestock, red meat, pork and poultry sourced from Australian producers, processors and wholesalers;
- imported food inputs and ingredients, such as spices and marinades;
- packaging (cartons, films, trays and labels);
- labour hire and recruitment services;
- cold-chain logistics, freight and warehousing;
- cleaning, sanitation and waste services at our sites;
- personal protective equipment, uniforms, knives and processing consumables; and
- utilities, IT and professional services.

Over 95% of our suppliers are Australian-based.

3. Risks of modern slavery in our operations and supply chains

We recognise that the meat processing industry, and food and agriculture supply chains more broadly, are recognised in Australia as sectors with elevated risk of modern slavery and labour exploitation. Consistent with guidance issued by the Attorney-General's Department, we describe below the areas where we consider our operations and supply chains could cause, contribute to, or be directly linked to modern slavery practices.

Operations

- Use of labour hire workers in production roles, including workers on temporary visas (e.g. working holiday and student visas), who may be more vulnerable to exploitation such as underpayment, excessive deductions, or coercive practices by intermediaries.
- Recruitment through third-party agencies, where fees or unethical practices could occur without adequate due diligence.

Supply chains

- Primary production (livestock and horticultural inputs): seasonal and migrant labour risk on farms.
- Imported inputs such as packaging, spices and ingredients, PPE, uniforms and processing consumables, which may originate from countries with weaker labour protections.
- Outsourced services at our sites, particularly contract cleaning and sanitation, a sector with documented exploitation risk in Australia.
- Cold-chain logistics and freight, including subcontracted transport.

4. Actions taken to assess and address these risks

Policies and governance

- Anti-Slavery Policy: sets out our zero-tolerance approach to modern slavery, applies to all employees, contractors, labour hire employees, work experience students and visitors, with overall responsibility resting with the Chief Executive Officer and senior management, and oversight by the Board of Directors.
- Workforce Recruitment Policy: requires all recruitment to comply with legislation, restricts use of recruitment agencies without senior approval, and mandates reference checks and structured approvals for all hires.
- Whistleblower and Grievance Policy: provides confidential channels for employees and other workers to raise concerns, including concerns about exploitation or modern slavery, with protection from detrimental treatment.
- Supplier Code of Conduct: sets out the labour and human rights standards we expect of suppliers, including the prohibition of forced labour, worker-paid recruitment fees and retention of identity documents.
- Related policies: Harassment, Discrimination, Violence & EEO Policy; Employee Counselling and Discipline Policy; Code of Conduct.

Due diligence in our workforce

- All staff are engaged on written contracts of employment, and we verify that no worker has paid direct or indirect fees to obtain work with us.
- We verify all workers' legal right to work in Australia.
- We review names and addresses of staff to identify indicators of exploitation such as high shared occupancy.
- All new recruits receive information on their statutory rights, including sick pay, holiday pay and other entitlements.
- We conduct due diligence on recruitment agencies and labour hire providers to confirm they are reputable and conduct appropriate checks on the staff they supply.

Due diligence in our supply chain

- We review labour agreements and policies with suppliers so that we can account for who is providing labour at each step of our processes.

- We inform our suppliers that we will not accept any form of exploitation in their business or any part of their supply chain.
- Suppliers are asked to acknowledge our Supplier Code of Conduct, and we use a modern slavery self-assessment questionnaire with suppliers, prioritising higher-risk categories such as labour hire, cleaning and imported inputs.

Training and awareness

- Line managers, coordinated by the National HR Manager, ensure relevant staff receive training on the Anti-Slavery Policy and supporting processes; managers are trained to remain alert to indicators of modern slavery, including the victim indicators listed in our policy.

Reporting and remediation

- Workers and others are encouraged to raise concerns about suspected modern slavery at the earliest possible stage, at any supplier tier, through their manager, the Whistleblower and Grievance Policy channels, or directly to the National HR Manager. We support anyone who raises a genuine concern in good faith, treat notifications confidentially, and prohibit detrimental treatment of reporters.
- Any suspected instance of modern slavery is escalated to the National HR Manager and the Chief Executive Officer, who oversee the response. Our response prioritises the safety and wishes of the affected person: we would ensure they are safe, connect them with appropriate support services, and refer suspected criminal conduct to the relevant authorities, including the Australian Federal Police.
- Where an issue arises in a supplier's operations, our preference is to require and monitor a corrective action plan rather than immediately terminate the relationship, where continued engagement better protects the affected workers; serious or unremediated breaches will result in termination of the supplier relationship.
- Any incident, the response taken and the outcome would be recorded, reported to the Board, and disclosed in a future Modern Slavery Statement.

5. How we assess the effectiveness of our actions

We assess the effectiveness of our actions through:

- annual review of the Anti-Slavery Policy and related HR and procurement policies;
- oversight by the Board of Directors and the Chief Executive Officer, supported by the National HR Manager, of compliance with our legal and ethical obligations;
- monitoring by the National HR Manager of concerns raised through our reporting channels, with investigations and outcomes reported to the Chief Executive Officer and the Board;
- monitoring of right-to-work verification, labour-hire provider due diligence, Supplier Code of Conduct acknowledgements and questionnaire responses; and
- a commitment to establish formal effectiveness metrics and reporting matrices in 2027 (for example: percentage of labour-hire providers vetted, percentage of relevant staff trained, and percentage of higher-risk suppliers assessed), with results reported to the Board and disclosed in future statements.

6. Consultation with entities we own or control

The entities in the Top Cut group operate under common management, shared policies and centralised HR, payroll, procurement and compliance functions. This statement was prepared under the oversight of the Chief Executive Officer and the National HR Manager, in consultation with the managers responsible for each Services of Top Cut Foods entity. The draft statement was circulated to the officers of each entity covered by this statement for review and comment before it was submitted to the Board of Top Cut Foods Pty Limited for approval.

7. Other relevant information and looking forward

This is Top Cut Foods' first Modern Slavery Statement.

In December 2025, during the reporting period, Top Cut Foods was acquired by Arcus Foods. Our commitment to identifying and addressing modern slavery risk continues under Arcus Foods' ownership, and we are working with Arcus Foods to align our modern slavery programs, policies and supplier standards across the wider group.

We acknowledge that building an effective modern slavery compliance program is a continuous improvement journey. In FY2027 we commit to:

- completing a documented modern slavery risk assessment of our tier 1 suppliers;
- completing the rollout of Supplier Code of Conduct acknowledgements and self-assessment questionnaires across our higher-risk supplier categories, and incorporating modern slavery clauses into our standard supplier terms;
- continuing modern slavery awareness training for procurement, HR and site management staff;
- establishing the formal effectiveness metrics and reporting matrices described in section 5; and
- monitoring the Australian Government's announced reforms to the Act (including proposed civil penalties and a failure-to-prevent offence) and uplifting our program accordingly.

Approval and signature

This statement was approved by the Board of Directors of Top Cut Foods Pty Limited, as the principal governing body of the reporting entity, on 26 July 2026 in accordance with section 13(2)(c) of the Act. It is signed by Vincent Elias in his capacity as a director of Top Cut Foods Pty Limited and a responsible member of the reporting entity, for and on behalf of the Board, in accordance with section 13(2)(d) of the Act.



Vincent Elias

Director, Top Cut Foods Pty Limited

Date: 26 July 2026