



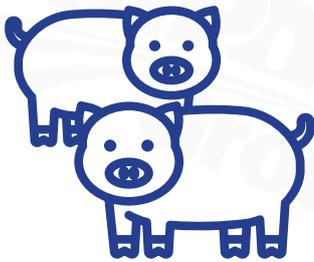
# MODERN SLAVERY STATEMENT

**A Joint Statement for:**  
SunPork Pty Ltd  
SunPork Fresh Foods Pty Ltd  
Swickers Kingaroy Bacon Factory Pty Ltd

**2021**

**STAFF**  
**1,500+**

we employ more than 1,300 staff in rural and regional communities.



**WE PRODUCE**  
**1,100,000**  
**PIGS** PER YEAR

**WE PRODUCE**  
**20%**

of Australia's Pork



Registered Office:  
SunPork Group  
Level 1, 6 Eagleview Place  
Eagle Farm, QLD 4009



## CONTENTS

- 4 Identify the Reporting Entity
- 5 Structure, Operations and Supply Chains
- 6 Risks of Modern Slavery Practices in our Operations and Supply Chains
- 7 Actions Taken in FY2021 to Assess and Address Those Risks
- 11 How we assess the effectiveness of such actions
- 11 Consultative process across SunPork Group
- 12 Other Information

## 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 2021 (F21).

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 an annual turnover exceeding \$100M for F21.

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 commencing this F21 reporting period.

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 F21 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](http://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 17 December 2021.



-----  
Dr Robert van Barneveld  
Group CEO and Managing Director



## STRUCTURE, OPERATIONS AND SUPPLY CHAINS

SunPork Group is one of Australia's largest pork producers and are 100% Australian owned. We produce exceptional pork products by controlling the value chain, with superior genetics and sustainable farming practices which produce only the best quality pork for Australia.

We have 43 Australian farms in 4 states (Queensland, New South Wales, South Australia, Victoria) and 6 New Zealand farms on 2 islands. We process 39% of all pigs in Australia across 2 abattoirs and 2 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, that is distributed to 1,700 supermarkets. We export 10 million kg of pork to at least 7 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 F21 the SunPork Group interacted with more than 2000 external vendors across our supply chain.

### Our Supply Chain comprises

- 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

## Risks of Modern Slavery Practices in our Operations and Supply Chains

Potential Modern Slavery Risk or Potential Indicators of Modern Slavery	Sectors or Industries at Higher Risk
<p><b>Internal Supply Chain (our operations)</b></p> <ul style="list-style-type: none"> <li>▪ Exploitation of migrant workers</li> <li>▪ Deceptive recruitment</li> <li>▪ Underpayment of wages</li> <li>▪ Excessive working hours</li> </ul>	<p><b>Internal Supply Chain (our operations)</b></p> <p>Functions within SunPork at higher risk:</p> <ul style="list-style-type: none"> <li>▪ Labour hire - farms, processing facilities.</li> </ul>
<p><b>External Supply Chain (our suppliers)</b></p> <ul style="list-style-type: none"> <li>▪ Bonded (debt) labour</li> <li>▪ Exploitation of migrant workers</li> <li>▪ Deceptive recruitment</li> <li>▪ Underpayment of wages</li> <li>▪ Excessive working hours</li> </ul>	<p><b>External Supply Chain (our suppliers)</b></p> <ul style="list-style-type: none"> <li>▪ grain</li> <li>▪ animal nutrition products</li> <li>▪ animal health products</li> <li>▪ value-add processing ingredients</li> <li>▪ clothing</li> <li>▪ packaging</li> <li>▪ construction</li> <li>▪ electronics</li> <li>▪ cleaning</li> <li>▪ storage and distribution</li> <li>▪ transport</li> <li>▪ trade services</li> <li>▪ security services</li> <li>▪ labour hire</li> </ul>

We are committed to continuously improving our risk identification capability.

## Actions Taken in FY2021 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. SunPork's modern slavery response is in its formative stages. Efforts to date have focused on developing a better understanding of the highly contextual nature of modern slavery, and how the term relates to the SunPork business across our diverse operations.

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. We intend to create impactful change that leaves a lasting legacy for the business and the communities we operate within.

It is for these reasons that SunPork is taking a measured approach – the business recognises that the complex nature of modern slavery means solutions will not be quick and SunPork cannot solve it in isolation from its suppliers. Getting the foundation principles right remains our focus in F21 and F22 alongside actions to identify and mitigate any in-house risk. We are committed to addressing ethical operations and ethical trade in our supply chains but it must be viable, so that it can be sustained long-term and aligned with our Group's vision, mission and values.

As a major Australian agriculture and fresh food company, our operations span the entire pork value chain. Internal assessment has highlighted that our operations are a critical starting point in identifying and addressing any risks.

Efforts in F21 have been focused on addressing potential operational (internal) risks against the below steps:



Identifying and addressing supply chain risks will commence in F22 along with a communication strategy to our supply partners.

## SUNPORK'S F21 ACTIONS INCLUDED:

1. **Completion of The Slavery & Trafficking Risk Template (STRT)** – an open-source survey published by the Social Responsibility Alliance (SRA) for the collection and sharing of slavery and human trafficking risk and compliance-related data across supply chains.
  - The survey outcomes highlighted some of the key areas for continuous improvement and will help guide initiatives undertaken to address potential modern slavery risks.
2. **Centralisation of our human resource team**
  - Appointment of a Chief Human Resources Officer (CHRO) and team to establish a centralised hub for in-house Talent Development and Talent Acquisition across the Group.
  - Streamline human resource processes and workflows to ensure consistent approaches end to end across business units.
3. **Restructure of our human resource strategy**
  - Strengthened partnerships with recruitment partners - agency labour remains a vital source of workers however in F21 the Group committed to consolidating the number of recruitment partners and strengthening ongoing partnerships to ensure long-term stability of our workforce and transparency in relationships.
  - Streamlining reliance on agency workers enables the creation of more full-time roles for individuals who have a shared interest in the long-term success of the business. The certainty and personal development opportunities this creates can boost performance and help attract and retain experienced and motivated shift workers.
  - Centralise tracking and management for the recruitment of and sponsorships of overseas workers.
4. **Labour agreement consolidation with Department of Home Affairs**
  - Sunpork Consolidated Pork Industry Labour Agreement is now in force and effect for 5 years from May 2021. This is the first Pork Industry Labour Agreement that has been approved since SARS-COVID19 hit.
  - This agreement brings together predecessor agreements held by separate subsidiaries of the Group and enables the Group to centrally manage our sponsorship obligations under the labour agreement. SunPork's migrant workforce is dispersed across regional and rural areas of Queensland, New South Wales, Victoria and South Australia. It further actions our commitment to ensuring our migrant workforce is treated fair and equitably under the terms and conditions of their employment.
5. **Human ethics** - continued participation in human rights reporting and assessments
  - Through members of our internal supply chain, we reported under SEDEX Members Ethical Trade Audit Report and Supplier Workplace Accountability (SWA) Assessment which requires us to demonstrate our commitment to respecting human rights in our operations.

6. **Commitment to safety** - shiftwork schedule restructure to reduce overtime
  - Across parts of our operations, we made significant roster pattern changes to move to multiple shifts with team members only working 4 days a week. Workplace health, safety and wellbeing is the greatest benefit to the business. Our experience indicates that stable and consistent start times and a reduction in overtime will translate to an engaged workforce and a safer working environment.
  - Employee engagement surveys, Total Recordable Injury Frequency Rates and Lost Time Injury Frequency Rate are key metrics of success being monitored regularly.
  
7. **Streamlining payroll across the Group**
  - A process of consolidating employees across multiple states to a central payroll function commenced in October 2020. The benefits are three-fold (i) a significant reduction of manual processes, (ii) improved and standardised reporting to decision-makers, and (iii) improved record-keeping and better employee support.
  
8. **Review of pay rates, hours and entitlements – for compliance with various awards and agreements**
  - A review process commenced in F21 to ensure employee rights, awards and entitlements are being met under the Fair Work Act 2009.
  - In June 2021 SunPork applied for the approval of an enterprise agreement under the Meat Industry Award 2020. Wages were reviewed under the enterprise agreement and increased in May 2021.
  - Our program of internal audits continue to ensure annual wage arrangements align with the National Employment Standards (NES) and relevant awards and enterprise agreements.
  
9. **Employee housing review and process development**
  - To overcome one of the common barriers to the attraction and retention of workers SunPork provides accommodation for regional and remote workers.
  - Prior to F21 this process was managed by individual business units.
  - In F21 a review of housing provided by SunPork to farm employees commenced. This review continues in F22 and it is expected that the key outcome will be a centrally managed employee accommodation delegation process across our operations.

## 10. Strengthening internal Group policies continues, including:

### **Preventing sexual harassment, bullying and discrimination policy**

Version 2.0

Policy Owner: Chief Human Resources Officer

Date Last Revised: 8 April 2021

- This policy provides requirements regarding inappropriate workplace behaviour, including sexual harassment, bullying and discrimination; guidelines about SunPork Group's role in preventing such conduct; and our procedures for reporting, investigating and resolving such matters. Our workplace grievance policy and speak out hotline was consolidated under this policy in the reporting period.

### **Code of conduct policy**

Version 2.0

Policy Owner: Group CEO and Managing Director

Date Last Revised: 18 June 2021

- The Code provides a clear and unambiguous framework within which all directors, employees, contractors and stakeholders are expected to operate. It emphasises our absolute commitment to employee health and safety, minimising our environmental footprint, working with the local communities that we operate within, and acknowledges the fundamental importance of protecting the SunPork reputation for integrity in all that we do.

### **Diversity policy**

Version 3.0

Policy Owner: Chief Human Resources Officer

Date Last Revised: 8 April 2021

- To achieve the objective of creating a culture that is flexible, inclusive and supportive this policy establishes a framework to foster a working environment that is not only exciting and challenging but is also flexible, inclusive and supportive. Diversity recognises and values the contribution of people with differences in background, experience and perspective.

## How we assess the effectiveness of such actions

SunPork will measure its effectiveness in mitigating slavery across our operations and supply chains by:

- Conducting a review of our modern slavery statement and internal policies that support compliance;
- Communication with our supply chain to ensure their understanding of, and promote compliance with, our expectations;
- Implement plans to monitor and review the effectiveness of our modern slavery risk management framework and processes; and
- Establish regular reporting to the SunPork Group Board and Executives to support transparency, accountability and ensure conformance to requirements.

## Consultative process across SunPork Group

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

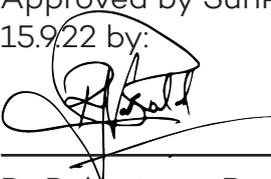
In F21, SunPork Group commenced the development and implementation of internal initiatives across our operations that aid in identifying potential risks of modern slavery. These initiatives are being developed in consultation with SunPork Group stakeholders.

## Other information

With more than 1,500 staff members working across 43 farms, 3 feedmills, 2 abattoirs and 2 value-add production facilities in Australia. We are committed to providing health and safety programs, training and education opportunities, and diversity and inclusion initiatives to help them reach their full potential. Our Code of Business Conduct and Ethics, Human Rights Policy and Supplier Code of Conduct help ensure we are creating a fair, ethical and accountable work environment.

With over 90% of our employees based in regional and rural communities, we value the important role we play in these communities as being a major employer with annual salaries of \$100 million paid out to these staff members. We continue to dedicate our time and resources to the well-being of our communities.

## Version Control

Version	Issued	Comment	Approvals
V1	25/12/2021	Report submitted to ABF	Approved by SunPork Group – refer to signature page 4
V2	15/09/2022	Correction – p9, item 9. Report reissued.	Approved by SunPork Group on 15.9.22 by:  <hr/> Dr Robert van Barneveld Group CEO and Managing Director



Registered Office:  
SunPork Group  
Level 1, 6 Eagleview Place  
Eagle Farm, QLD 4009