

# Modern Slavery Statement

Year ending 2023

This joint statement is published in accordance with the Modern Slavery Act 2018 (Cth). It sets out the actions taken by Sapphire Cattle Company Pty Ltd, Hewitt Agribusiness Pty Ltd and Arcadian Organic & Natural Meat Co Pty Ltd, to identify and address modern slavery risks in our supply chain during the calendar year ending 31 December 2023.



# Contents

- 1. Introduction and Identity of Reporting Entity ..... 3**
- 2. Structure, Operations and Supply Chain ..... 4**
  - a. Our Structure .....4
  - b. Our Supply Chain.....4
- 3. Modern Slavery Risks in Operations and Supply Chain..... 5**
  - a. Risks in our Operations .....5
  - b. Risks in our Supply Chain .....6
- 4. Assessing and Addressing Our Modern Slavery Risks..... 6**
- 5. Assessing Effectiveness and The Way Forward .....7**
- 6. Statement Of Approval ..... 8**

## 1. Introduction and Identity of Reporting Entity

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) for the reporting period January – December 2023 (**Reporting Period**). When the term “modern slavery” is used in this statement, it has the meaning given to it in the Act.

This is our second Modern Slavery Statement, made jointly by the following entities:

- Sapphire Cattle Company Pty Limited ACN 600 389 286 (**Sapphire Cattle**);
- Hewitt Agribusiness Pty Ltd ACN 157 927 887 (**Hewitt Agribusiness**); and
- Arcadian Organic & Natural Meat Co Pty Limited ACN 158 956 864 (**Hewitt Foods**).

Each of these companies are a “Reporting Entity” as defined in the Act, being Australian entities with consolidated revenue of over AU\$100 million for the Reporting Period. In this Statement, Sapphire Cattle, Hewitt Agribusiness and Hewitt Foods are collectively referred to as ‘**Hewitt**’, ‘**we**’, ‘**us**’ and ‘**our**’.

Hewitt operates a vertically integrated supply chain and ecosystem spanning livestock breeding and fattening through to branded retail-ready organic and natural meat products which are sold to customers across the globe.

As at the date of this submission, Hewitt also holds a 70% interest in Western Plains Pork Pty Ltd ACN 079 759 336 as trustee for the Western Plains Pork Trust, which operates a pig farming business in Victoria. For clarity, that entity is not a Reporting Entity as it does not meet the minimum revenue threshold.

Since the publication of Hewitt’s first Modern Slavery Statement, we have taken steps to better understand the potential risks of modern slavery across our operations and supply chain. We are committed to taking action to limit the risk of modern slavery by working with our people, subsidiaries, stakeholders, business partners and suppliers. This statement details the steps we have taken during the Reporting Period to identify and address the risks of modern slavery which may be present in and around our business.

We believe that there is more that can be done to combat modern slavery. Being a global supplier of high-claims protein, we are well-positioned to continue promoting ethical practices and reducing modern slavery risks in our operations and supply chain, in partnership with our suppliers, members, business partners and other stakeholders.

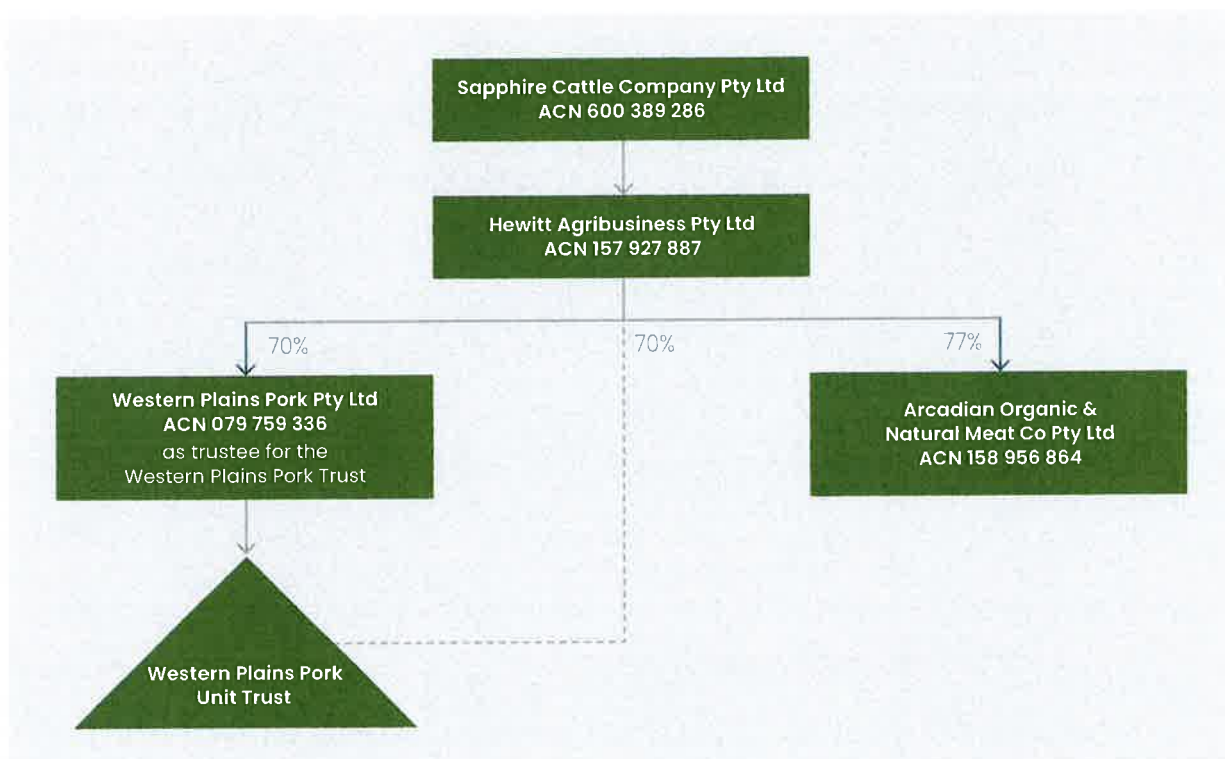
## 2. Structure, Operations and Supply Chain

In Australia, Hewitt is a significant producer of organic livestock and high-quality certified organic and free-range meat products. We sell our branded products throughout Australia and overseas (e.g. Japan). Our bulk organic and natural meat products are sold as a wholesale product to other producers in Australia, the USA and Asia.

### a. Our Structure

During 2023, Hewitt employed 230 staff on average across the organisation, These staff worked on our various pastoral properties in Queensland, New South Wales and the Northern Territory, in our meat processing facility in New South Wales, and at our commercial offices in Brisbane and Toowoomba.

In 2023, Hewitt's company structure was made up of several operating entities as set out below.



Please note that as of the submission of this Statement, Hewitt now owns or controls 100% of Hewitt Foods and has divested its interest in Western Plains Pork Pty Ltd and the Western Plains Pork Unit Trust.

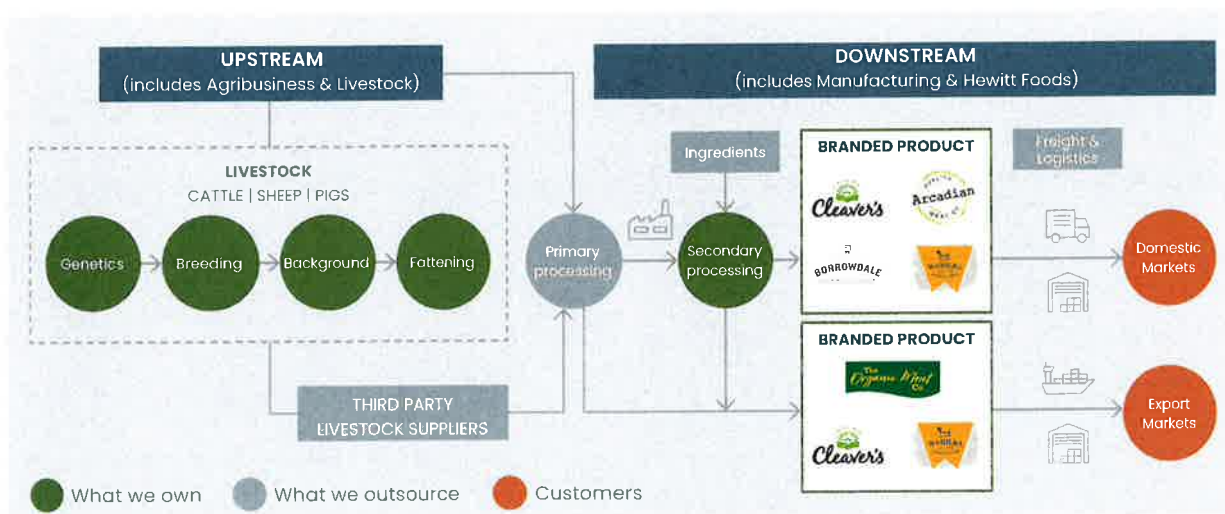
During the course of 2023, Sapphire Cattle acquired interests in businesses in the United States of America which are downstream value-add, meat processing and retail distribution companies. These interests were held for less than 6 months in 2023 and are not Reporting Entities as they do not conduct business in Australia. Accordingly, we mention them for completeness only.

### b. Our Supply Chain

Our supply chain begins with the "upstream" part of our business operated by Hewitt Agribusiness. This is where livestock are bred and grown on our pastoral properties. This process involves the purchase of goods and services such as feed, contract musters, livestock cattle transport, and farming plant and equipment. The majority of these suppliers are Australian-based businesses. Some of this livestock are then sold to third party processors. However, some of the livestock is sold into our own "downstream" business which is run by Hewitt Foods. Hewitt Foods handles the manufacture, marketing and sale of:

- branded retail-ready meat products which are sold through domestic retail channels in Australia as well as in export markets; and
- branded and un-branded organic meat products which are sold to parties to be used as ingredients in their own branded products.

This manufacturing and retail side of our business involves the procurement of livestock, purchase of raw manufacturing materials, finished good products from 3rd party manufacturers, processing plant and equipment, service contractors, packaging materials, cold storage facilities, freight and logistics, and our own professional and administrative services. The main raw materials used in the manufacture of our products are predominantly Australian-made or produced, apart from some secondary ingredients.



### 3. Modern Slavery Risks in Operations and Supply Chain

#### a. Risks in our Operations

At Hewitt, we acknowledge that modern slavery risks can arise in both our own operations and our larger supply chain. Following the modern slavery risk assessment of our operations which was undertaken for the 2022 Reporting Period, we assessed that risk as low. We continue to believe this is the case, as our operations and employees are based in Australia which is a country with an extremely low prevalence of modern slavery according to The Global Slavery Index 2023.

We continue to have extensive oversight of our Australian operations, and we have policies and procedures in place in our business to foster safe systems of work. We have implemented systems and processes to ensure that our employees are paid correctly and that their hours worked are not excessive. We also have a number of avenues to allow workers, their families and other stakeholders to raise concerns about our practices on an anonymous basis without penalty and we communicate these avenues to staff on a regular basis.

As of May 2023, most of Hewitt’s own pastoral properties are certified organic by the Regenerative Organic Alliance (ROC). The criteria for certification, among other things, requires Hewitt to maintain high standards in relation to worker fairness, animal welfare and land management, and mandates an annual independent third-party audit process to validate these processes. Many of the key tenets and requirements of the ROC certification have cross-over with modern slavery requirements and restrictions, for example the “Farmer and Workers Fairness” Pillar contains a prohibition on forced labour and requirements for equal and fair pay. Our certification with ROC is another reason we believe the risk in our own operations to be low.

In addition to ROC audits, we are also undertake other audits such as Sedex Members Ethical Trade Audits (SMETA) to ensure that our own operations remain ethical and safe for our workers.

## b. Risks in our Supply Chain

Within our supply chain, our own operations are two of the three largest suppliers to our downstream business (by spend). As a result, we have greater oversight, visibility and control over a significant part of our direct supply chain.

We are also in the process of assisting many of the livestock producers in our supply chain to become ROC-certified. Our first third-party livestock producer became ROC-certified in 2023 and we expect many more to join them in 2024 and beyond. This gives us increasing confidence in the practices adopted by the producers who supply our livestock.

In preparing this Statement, Hewitt identified approximately 1,400 suppliers in this Reporting Period. Our major suppliers by spend (who are not Australian livestock producers) are primary processing plants and trucking and logistics companies. Many of these entities have published their own modern slavery statements and we have reviewed these, together with any publicly available modern slavery policies to understand their approach to and assessment of modern slavery risks in their supply chain. We will work with these suppliers in the coming years to deepen our understanding of their supply chain and the risks within it, including seeking modern slavery statements.

The majority of our suppliers are located in Australia and operate within the agricultural and meat processing industries. Given Australia's classification as a low-risk country under The Global Slavery Index 2023, we expect the greatest risk of modern slavery exists further "down the line", where the products used by our suppliers are made or produced. Accordingly, collaboration with our suppliers with this in mind will be required if we are to ensure the risk of modern slavery is minimised in our supply chain.

## 4. Assessing and Addressing Our Modern Slavery Risks

As per our first Modern Slavery Statement submitted with respect to the 2022 Reporting Period, a modern slavery risk assessment was recently undertaken by Hewitt. Following that analysis, Hewitt has implemented (or is in the process of implementing) further strategies and procedures which seek to better assess and address the risks of modern slavery which may be present in our operations and supply chains. The overall aim of these strategies and procedures is to remain vigilant, through due diligence, of the risks of modern slavery and remediate instances of suspected modern slavery should they arise.

These strategies and procedures are predominantly enshrined in Hewitt's Modern Slavery Policy (the **Policy**). The Policy is provided to all employees of Hewitt through its employee management system. The Policy:

- **(Awareness)** clearly explains modern slavery (as defined by the Act) to employees, as well as Hewitt's commitment to identifying and mitigating its occurrence in our operations and supply chain;
- **(Procedures)** explains the procedures which Hewitt seeks to implement at both an organisational and employee level to reduce the risk of modern slavery, including:
  - working with the operational teams to efficiently implement a supplier approval and pre-screening;
  - seeking to incorporate specific prohibitions on modern slavery practices in Hewitt's contractual documents with suppliers, purchasers, landlords, tenants and other commercial third parties;
  - continuous education of Hewitt employees which have oversight of supplier agreements, supply chains and third-party agreements to ensure the appropriate due diligence is carried out;
  - investigation and auditing as required (e.g. following a report of suspected modern slavery);
  - carrying out remedial measures on a case-by-case basis in the event of a breach of the Policy by any employee (including disciplinary action if necessary);
  - dealing with any breaches of the Policy or other procedures by relating to modern slavery by our suppliers or other counterparties, with a view to remediating the breach or potentially terminating Hewitt's arrangements with that party;
  - incorporation of modern slavery principles and countermeasures in other internal Hewitt policies.
- **(Reporting)** encourages employees to report (anonymously if required) directly to the General Counsel or Group CEO any instances or suspicions of modern slavery or breaches of the Policy in our operations and supply chain.

We have prepared a Modern Slavery Questionnaire which we intend to issue to our key suppliers in 2024. This Questionnaire will provide our key suppliers with information on modern slavery and the importance of identifying its attendant risks, as well as ask our suppliers to provide information on their own modern slavery systems. Questions include whether the suppliers have a modern slavery policy, what due diligence those suppliers undertake, and a remediation plan for any known or suspected incidents. We hope to receive positive feedback from this Questionnaire and propose to carry out diligent follow-up of unexpected or suspicious responses.

We are also seeking to implement into applicable supply contracts a modern slavery clause based on the Attorney-General's model clauses. This clause, among other things, requires suppliers to warrant that conduct in its supply chain does not constitute modern slavery, and that it will notify us if modern slavery is occurring.

As per our Statement for the 2022 Reporting Period, Hewitt also has several secondary policies and procedures in place to assist in combatting modern slavery in its own operations, including:

- a **Code of Conduct** which sets out the principles by which Hewitt does business and deals with its stakeholders. Our Code of Conduct requires employees, contractors and directors to act in an ethical manner and exemplify Hewitt's high standards of professionalism.
- **Health & Safety Systems** which seek to educate and protect our employees and contractors, and promote the mental and physical wellbeing of our workers.
- **Recruitment Policies** which seek to ensure that fairness and equality is incorporated into each step of our recruitment process.
- **Grievance & Whistleblower Platforms**, each of which provides stakeholders with multiple ways to raise concerns with Hewitt either directly or through anonymous channels. These concerns are received and managed through our Governance or People, Safety & Culture teams, with independent external support as required (in particular, issues and feedback raised through our Whistleblower platform are managed by a third-party law firm).
- **Remuneration Processes** which ensure employees are paid and that the hours worked by employees are monitored.
- **Governance Structures** that promote and educate on modern slavery practices, including a risk committee aims to be well-versed in modern slavery risks.

## 5. Assessing Effectiveness and The Way Forward

Hewitt recognises the importance of continuous improvement by regularly assessing the effectiveness of our actions taken to address modern slavery risks. In doing this, we aim to build more transparent and open relationships with our suppliers in order to mitigate the risk of modern slavery occurring in our operations and supply chain.

In addition to responding to case-by-case incidents which are reported or identified via our policies and procedures, the requirement under the Act to produce an annual Modern Slavery Statements provides Hewitt with the opportunity to review and assess our performance in this critical area. While we have confidence in our own operations in Australia given the degree of oversight we have, we acknowledge that it is important to remain alive to the risks of modern slavery in all areas of our business.

We are committed to continuously improving our processes to address the modern slavery risks in our operations and supply chains and ways to mitigate them. Over the next reporting period, we intend to:

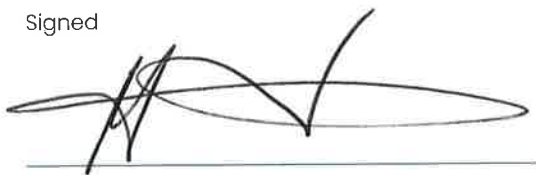
- continue to pursue ROC certification of each of our key producers, enabling a third party audit process in relation to farmer and worker fairness;
- diligently pursue any adverse or suspicious responses to our Modern Slavery Questionnaire;
- continuously review of our policies and procedures to ensure they are compliant with the Act;
- continue to work with our suppliers to include in more and more contracts, appropriate modern slavery clauses and protections (including providing training to relevant team members on the importance of Modern Slavery clauses in our contracts).

## 6. Statement Of Approval

The same management team oversees both businesses in Hewitt Agribusiness and Hewitt Foods. Accordingly, consultation with Hewitt Foods has occurred as part of the process.

This statement was approved by the Board of Hewitt Agribusiness Pty Ltd.

Signed



**Michael Hewitt**

Group Chief Executive Officer & Managing Director

18/12/2024

Date

