

THOMAS **FOODS**[®]
INTERNATIONAL



FEEDING FAMILIES GLOBALLY

PROUDLY AUSTRALIAN & FAMILY OWNED SINCE 1988

2025

MODERN SLAVERY STATEMENT

**FAIR WORK CONDITIONS • RIGHT TO REPRESENTATION • UNIVERSAL HUMAN RIGHTS
EQUAL PAY FOR EQUAL WORK • SAFE WORK CONDITIONS**

Feeding families globally



CONTENTS

MESSAGE FROM THE MANAGING DIRECTOR AND OWNER.....	2
TFIC BOARD ATTESTATION STATEMENT	2
ABOUT THOMAS FOODS INTERNATIONAL	3
THE REPORTING ENTITY	3
Thomas Foods International Consolidated Pty Ltd (ABN: 20 105 099 849)	
.....	3
REPORTING REQUIREMENTS	4
OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS	8
OUR BUSINESS FAMILY AND OPERATIONS.....	8
TFI AUSTRALIAN REPORTING ENTITIES.....	10
TFI USA and CANADA.....	10
OUR PRODUCTS & SERVICES	11
OUR SUPPLY CHAINS	11
MODERN SLAVERY RISK IN OUR OPERATIONS AND SUPPLY CHAINS	
SLAVERY RISK.....	12
TFIC Australian Operations.....	13
Atron.....	13
TFI USA	14
Luiten.....	14
KEY FACTORS CONTRIBUTING TO TFI'S INTERNAL RISK LEVEL.....	15
PACIFIC AUSTRALIA LABOUR MOBILISATION SCHEME.....	15
Initiatives to Reduce Modern Slavery Risks in the PALM Scheme.....	15
Actions Taken to Assess and Address Modern Slavery	16
TRAINING	17
SUSTAINABILITY PLATFORM AND SYSTEMS.....	17
MODERN SLAVERY POLICY	17
Statement of Intent.....	17
Objectives.....	17
Key Strategies.....	18
MODERN SLAVERY FRAMEWORK	18
FORWARD STRATEGY	20
Calendar 2026	20
Following Years	20
DUE DILIGENCE	20
CONSULTATION WITH REPORTING ENTITIES.....	21
REMEDATION	21
OTHER RELEVANT INFORMATION.....	21

Feeding families globally



MESSAGE FROM THE MANAGING DIRECTOR AND OWNER

Thomas Foods International Consolidated Pty Ltd (TFIC) is a family-owned business founded and built upon strong family values.

We are committed to ethical and socially responsible business practices which encompass human rights, as defined in the *United Nations ('UN') Universal Declaration of Human Rights*, the fundamental labour standards established by the *International Labour Organisation (ILO)* and relevant *ILO Conventions*, fair and safe working conditions, environmental compliance, and ethical behaviour. TFIC adopts the Australia Attorney General Department's definition of "modern slavery", which includes human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and child labour.

We strive to identify, monitor and mitigate modern slavery risks, and for our supply chain and operations to remain free from exploitation, discrimination, bullying, harassment, or the marginalisation of others. We celebrate our diversity and treat each other as equals, regardless of background or circumstance.

The TFIC group is respectful and supportive of the communities in which we work and partner. We work in close collaboration with local communities and businesses, acknowledging and upholding local customs, and remaining sensitive to cultural needs and requirements. We expect our suppliers, customers and stakeholders to share and demonstrate the same commitment.

Over the past twelve months, the TFI group has continued to experience significant change and throughout our business and supply chains. We continue to operate with a long-term approach and consistently invest in

activities that reduce our risk, increase our transparency, and ensure we are accountable to our community and stakeholders. Our actions this year have included investigating traceability and risk assessment systems to support the TFIC group's key sustainability areas, including Modern Slavery, and the progression of the modern slavery **Forward Strategy**.

It is my great honour to lead and work alongside an exceptional team that goes about its business with integrity, responsibility, and compassion. I look forward to upholding our company values and traditions, and in doing so, continuing to prevent, detect and mitigate the risk of modern slavery in our operations and supply chains.

TFIC BOARD ATTESTATION STATEMENT

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), and in particular Section 11 thereof, I, Darren Thomas, on behalf of the TFIC Board, attest that the Board has reviewed the information contained in the report for the entities listed below. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed below.

A handwritten signature in black ink, appearing to read 'Darren Thomas', is written over a light blue horizontal line.

Darren Thomas
Group Managing Director

ABOUT THOMAS FOODS INTERNATIONAL

TFIC is Australia’s largest family-owned meat processing and distribution business – producing, processing, distributing, and selling premium meat and seafood all over the world. The consolidated group of companies operates in Australia, the United States (US), Canada, China, Japan, Singapore, the United Arab Emirates (UAE), Brazil, the Netherlands, and the United Kingdom (UK).

Our mission is to **feed families globally** through premium quality food products, exceptional customer service and sustainable, innovative practices, TFIC’s global presence continues to successfully grow and develop.

At TFIC, we are acutely aware of our responsibility to the people and communities with whom we work and partner, and the livestock upon which our livelihood depends. Human rights, worker safety and well-being, animal welfare, environmental sustainability, and corporate responsibility are all part of the fabric of our business and integrated into everything we do.

THE REPORTING ENTITY

Thomas Foods International Consolidated Pty Ltd (ABN: 20 105 099 849)

TFIC is pleased submit the group’s fifth *Modern Slavery Statement* (“Statement”), for the financial year ending 30th June 2025. It is the company’s second *Statement* for California, and it’s third under the Canada and UK legislations. It is the first report with Luiten Food Beheer BV included in the TFIC group joint Statement. Previously, Luiten disclosed separately in the EU and UK.

For the purposes of this joint *Modern Slavery Statement* (the ‘Statement’) the group reporting entity is Thomas Foods International Consolidated Pty Ltd (TFIC), a privately-owned company operating out of and registered at Level 2, 162 Fullarton Rd, Rose Park SA 5067.

The Statement is made pursuant to Section 54(1) of the UK *Modern Slavery Act 2015*, Section 11(3) of Canada’s *Fight against Forced Labour and Child Labour in Supply Chains Act 2023*, Section 14 of the Australia *Modern Slavery Act 2018 (Cth)*, and Senate Bill No. 657 (SB 657) in relation to the *California Transparency in Supply Chains Act 2010*.

The Statement was reviewed and endorsed by the TFIC Board on the 20th December 2025.

This joint Statement covers the following reporting entities, operating as a part of the TFIC group, of which, TFI is the main operating entity:

- **Thomas Foods International Pty Ltd (TFI)** (ABN 52 008 178 121) - Australia, California, Canada and UK reporting entity.
- **Thomas Foods International Australia (TFIA)** (ABN 94 007 939 424) - Australia reporting entity.
- **Atron Enterprises Pty Ltd (Atron)** (ABN 73 122 150 485) - Australia reporting entity.
- **Thomas Foods International, Canada Ltd (TFI Canada)** (Canada BN 757132733) - Canada reporting entity.
- **Thomas Foods International, USA Inc. (TFI USA)** (California Entity ID 1610353) - California and Canada reporting entity.
- **Luiten Food Beheer BV (Luiten)** (Chamber of Commerce #27052765) - UK reporting entity.

REPORTING REQUIREMENTS

As an international business, the TFIC group is subject to multiple jurisdictional compliance requirements. The relevant legislations addressed in this Statement are as follows:

Australia

- *Modern Slavery Act 2018 (Cth)*

The Statement's disclosure format and structure is guided by the legislated mandatory reporting criteria, as laid out in the *Act*. The Australian legislation requires an additional section -not in the UK, Canada or California requirements- for reporting entities to provide any further information if deemed relevant.

United Kingdom

- *Modern Slavery Act 2015*

Similar to Australia, the UK has mandatory reporting for reporting entities. However, the disclosure format and structure is guided by only recommended reporting criteria, as laid out in the *Act*. In March 2025, the UK Government issued further guidance on the reporting obligations around recommended disclosures, general principles on anti-slavery activities, and the importance of tackling modern slavery. The guidance are recommendations only and not mandatory, and the update did not involve changes to existing law.

California

- *California Transparency in Supply Chains Act 2010, Senate Bill 657*

The California legislation requires eligible entities to “disclose to what extent, if any”, they undertake verification, auditing, certification, accountability, and training, in relation to slavery and human trafficking.

The California Bill does not require companies to follow a mandated format, nor directly submit their *Modern Slavery Statement* to a government department. In contrast, the Bill requires Statements - under Section 1.2(b) of SB 657 – to “be posted on the retailer seller’s or manufacturer’s Internet Web site with a conspicuous and easily understood link to the required information placed on the business’ homepage.”

Canada

- *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023*

Canada legislated mandatory reporting requirements for reporting entities in 2023. Similarly to Australia, the disclosure format and structure is guided by a mandatory reporting criteria, as laid out in the *Act*. There are two additional sections required under the Canadian legislation that relate to remediation actions, if relevant.

To assist with aligning our multiple compliance obligations, **Table 1** reconciles the sections of this Statement to the relevant reporting criteria of the Canada, California, UK and Australia modern slavery and supply chain Bills and Acts.

Table 1. Canada, California, the UK and Australia reporting requirements reconciliation

California - Transparency in Supply Chains Mandatory Reporting Criteria	Canada - Forced Labour Act Mandatory Reporting Criteria	UK - Modern Slavery Act Recommended Reporting Criteria	Australia - Modern Slavery Act Mandatory Reporting Criteria	Addressed in this Statement	
				Section	Summary
Not applicable	Organisation’s structure, activities and supply chains.	Organisation’s structure, its business and its supply chains.	Identify each reporting entity covered by the joint statement.	Message from the Managing Director and Owner (including Attestation Statement (Canada))	<ul style="list-style-type: none"> ✔ Joint Statement explanation ✔ List of reporting entities
Not applicable			Describe the structure, operations and supply chains of each reporting entity covered in the joint statement.		
Verification - Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.	Parts of the business and supply chains that carry a risk of forced labour and child labour being used and the steps taken to assess and manage the risk.	Parts of the organisation’s business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it as taken to assess and manage the risk.	Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement, and any entities that each of those reporting entities owns or controls.	Modern Slavery Risks in our Operations and Supply Chains	<ul style="list-style-type: none"> ✔ Procurement risk matrix ✔ Key factors determining risk ✔ PALM Scheme
Certification - Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.					

California - Transparency in Supply Chains Mandatory Reporting Criteria	Canada - Forced Labour Act Mandatory Reporting Criteria	UK - Modern Slavery Act Recommended Reporting Criteria	Australia - Modern Slavery Act Mandatory Reporting Criteria	Addressed in this Statement	
				Section	Summary
Audits - Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.	Its policies and its due diligence processes in relation to forced labour and child labour.	Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains.	Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes.	Actions Taken to Assess and Address Modern Slavery	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> TFIC's "Statement of Intent" <input checked="" type="checkbox"/> TFIC's objectives <input checked="" type="checkbox"/> Modern Slavery Framework <input checked="" type="checkbox"/> Forward Strategy <input checked="" type="checkbox"/> Due Diligence
Training - Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.	The training provided to employees on forced labour and child labour.	Training about slavery and Human trafficking available to the organisation's staff.			
Accountability - Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.					

California - Transparency in Supply Chains Mandatory Reporting Criteria	Canada - Forced Labour Act Mandatory Reporting Criteria	UK - Modern Slavery Act Recommended Reporting Criteria	Australia - Modern Slavery Act Mandatory Reporting Criteria	Addressed in this Statement	
				Section	Summary
Not applicable	How the entity assesses its effectiveness in ensuring that forced labour and child labour are not used in the business and supply chains.	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks.		
Not applicable	Not applicable	Not applicable	Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities own or control.	Consultation with Reporting Entities	☑ Management and Executive oversight structure
Accountability	Any measures taken to remediate any forced labour or child labour. Any measures taken to remediate the loss of income to the most vulnerable families that results from any measures taken to eliminate the use of forced labour or child labour in its activities and supply chains.	Not applicable	Not applicable	Remediation	☑ Remediation steps to address any identified occurrences in modern slavery or forced labour.
Not applicable	Not applicable	Not applicable	Any other relevant information.	Other Relevant Information	☑ Reported and detected incidents in the last reporting period (12 months).

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

OUR BUSINESS FAMILY AND OPERATIONS

TFIC is the parent entity of the TFIC group of companies, with **primary production and processing operations based in Australia**. Our supply operations (i.e., secondary processing operations, sales and distribution operations) (**Figure 2**) are located throughout Australia, the United States, Canada, China, Japan, Singapore, the Netherlands, the UAE, Brazil and the United Kingdom (**Figure 1**).

Figure 1. TFIC group Australian and international locations



Figure 2. TFIC group of companies' operational structure and brands

TFI GROUP OF COMPANIES



\$4.1 BILLION	4,500+	85+	6	1
ANNUAL GLOBAL REVENUE	TEAM MEMBERS GLOBALLY	COUNTRIES SERVED	CONTINENTS SERVED	FAMILY BUSINESS

TFI AUSTRALIAN REPORTING ENTITIES

TFI, TFIA and Atron operate across Australia, servicing the different value chain needs of the TFI group. **TFI** acts as the **main operational company** as well as the employer for the non-processing functions, including but not limited to management, sales and marketing, finance, IT, HR, livestock, and sustainability. TFI sells product on both the domestic and international markets. This includes bovine, ovine and goat products as well as by-products, such as skins and tallow.

Thomas Foods' seafood company, **Thomas Cappel Seafoods**, a non-reporting subsidiary of TFIC, will be wound up in FY 2025/2026, thus reducing the modern slavery risk for the Australian entity for future reporting periods. However, seafood is and will continue to be sourced by TFI USA and Luiten for their operations and those supply chains will be addressed under those entities.

TFIA is the **domestic wholesale, retail and distribution arm** of the TFIC group. The company operates several retail and distribution sites in South Australia, Victoria, Queensland, the Northern Territory, New South Wales and Western Australia. TFIA purchases much of its protein products from TFI's processing plants. TFIA will also supplement its supply with third party product sourced from Australian processors and producers. This includes poultry, pork and seafood. Some TFIA products for our domestic supermarket customers incorporate additional ingredients, such as herbs, spices and butter.

Atron acts as a beef **service kill facilitator and exporter** for the TFIC group. The company is registered at the TFI Head Office in Adelaide. All Atron operations are managed by TFI employees.

TFI USA and CANADA

Both TFI USA and TFI Canada are wholly owned subsidiaries of TFIC, servicing the group's **North American and Caribbean markets**. Unlike Australia, neither

operation undertake any direct processing of livestock. Both companies purchase TFI Australian product, which accounts for nearly 61% (2024: 50%) of TFI USA's total protein expenditure, and 70% (2024: 68%) of TFI Canada's. They also procure proteins from South America, the US, New Zealand, Canada, Uruguay and Europe. This includes beef, lamb, poultry, pork and some seafood.

TFI Canada operates out of its office in Newmarket, Ontario.

TFI USA's headquarters is located in Cherry Hill, New Jersey; while the value adding and distribution plant is located nearby in Swedesboro, Pennsylvania.

LUITEN FOOD BEHEER BV

Luiten Food Beheer BV (Luiten) is TFI's joint venture partner, serving as the central hub for the TFI group's **operations across the European Union and United Kingdom, including supporting distribution and sales**. Based in Leidschendam, The Netherlands, Luiten specialises in the import, export, and distribution of various meat and protein products. The company, also operating under the TFI EU/UK brands, exclusively distributes TFI products in the European market, including beef and lamb. It also sources a wide range of proteins from other global suppliers, including those from New Zealand, South America and Europe. Luiten's **value-added services**, which include **custom packaging and product development**, serve a wide array of clients, including wholesalers, foodservice providers, and retailers throughout the EU and UK.

OUR PRODUCTS & SERVICES

The TFIC group produces and sources premium meat and seafood products for local, national, and global markets. We also provide products, services, and logistics for boxed food delivery services in Australia. Our global customer base includes food wholesalers, distributors, and retailers (major supermarket chains, butcher shops), restaurants, commercial caterers, hotels, pubs and clubs, aged care facilities, and e-commerce.



PREMIUM MEAT AND SEAFOOD

270,000 TONNES	6,500+	3,800+	1
Premium products per annum	Customer accounts	Quality suppliers	Recipe for success

OUR SUPPLY CHAINS

The TFIC group procures a wide variety of goods and services to support its business operations. Our inbound supply chain is made up of two key categories:

1. **Non-traded goods and services** comprise of goods and services which do not form part of our finished product portfolio. These include

uniforms and PPE, utilities, contract services (including labour), haulage and international shipping, consulting and professional services, computer equipment, IT software, security, and cleaning and catering.

2. **Trade-related inputs** comprise of livestock (cattle, sheep, lambs and goats), fresh and frozen seafood, pork, poultry and red meat products, packaging, spices and flavourings, chemicals and fertilisers, and livestock feed. These feed directly into our product portfolio.

In Australia, where possible, TFIC companies prioritise Australian suppliers and partners, who share our commitment for socially responsible and sustainable products and services.

MODERN SLAVERY RISK IN OUR OPERATIONS AND SUPPLY CHAINS

Per TFIC’s *Forward Strategy*, which was introduced in our *2023 Statement*, the TFI group is taking required actions to move TFIC towards best practice, and the desired state of traceability and supplier engagement. With the objective of identifying material risks, an analysis across our Tier 1 vendors identified a number of medium to high-risk procurement areas based on their sector and/or geography (**Table 2**). These risks were determined using the *Global Slavery Index 2023*, government and ILO statistics, and industry alignment and research.

TFIC has started to undertake a global risk assessment and supplier engagement process which will continue into the 2026 and future years, including a deeper analysis into our Tier 2 and Tier 3 suppliers. This will help us obtain a more in-depth understanding of the group’s material procurement areas and risk centres.

TFIC’s global supply chain risk characteristics have not materially changed in the 2024/2025 financial year, from prior reporting periods. The addition of Luiten to the joint Statement and reporting group, has shifted some risks to other geographies and procurement sectors. This is addressed in the below sections.

Table 2. Sector risk matrix

Procurement Sector	TFIC Scope	Risk Considerations
PPE & uniforms	PPE: Processing workers Uniforms: Operational and HO staff	High risk sector, based on geographical sourcing.
Computer hardware	All TFI sites	High risk sector, particularly China.
International fishing	TFI Consolidated and Luiten	High risk in SE and South Asia and some South American fisheries – including Bangladesh, India, Vietnam, China, Indonesia, and Brazil.
Transportation – international shipping	Atron, all TFIC exporting entities and Luiten	High risk sector globally.
Cleaners	Specific TFIC locations	High risk sector outside Australia. Low to medium risk in Australia.
Cardboard, paper & pulp	TFIC processing sites	High risk sector outside Australia.

Labour hire	TFI Consolidated processing sites	High risk sector outside Australia.
Security	TFIC processing sites	Medium risk sector globally.
Livestock	TFI USA and TFI Canada	Brazil – high risk Argentina – medium risk
Meat processing	Atron - 3 rd party processors	High risk sector globally.

TFIC Australian Operations

TFIC’s Australian operations (excluding Atron) have limited exposure to modern slavery due to the domestic and livestock-heavy nature of the supply chain across reporting entities. Australian livestock purchases accounted for approximately 56% (2024:55%) of the Australian-based operational expenditure in the reporting period.

However, medium-to-high modern slavery risk procurement areas, listed in **Table 2**, have highlighted the need for further investigation, verification, certification and engagement across the group’s supply chain. These higher risk procurement areas (excluding livestock) represent approximately 6% (2024: 6%) of the total Australian operational expenditure.

In the 2024/2025 financial year TFI shifted from internal recruitment to external resources to support the processing plants’ labour requirements. During the reporting period labour hire represented approximately 16% of the TFI group’s total Australian salaries. This is concentrated to the processing plants business units. The switch to labour hire was necessary to assist with managing shortfalls where direct labour was not available. TFIC conducts a comprehensive audit process to ensure all workforce arrangements comply with local and national laws, as well as TFICs terms of service.

Atron

Atron facilitates third party service kills on behalf of TFI in Australia, for various export markets and beef product customers. Throughout the reporting period Atron engaged two, Victorian-based third-party processors, both of whom underwent SEDEX audits.

The majority of Atron’s procurement occurs within Australia, of which 85% (2024:83%) is livestock purchases, and 12% (2024: 11%) service kill fees. Therefore, the company has an overall low modern slavery risk. However, international shipping, a high modern slavery risk sector, represents 2% (2024: 2%) of Atron’s total procurement. As identified in the gap analysis, an assessment, verification and certification process of these service providers will be undertaken in the 2026 calendar year across the TFI group.

TFI Canada

The majority of TFI Canada's supply chain - 91% (2024: 88%) - related to protein product procurement, of which around 4% (2024: 2%) was sourced from Canadian suppliers. The remaining regions of origin were Australia (77%), New Zealand (12%), Canada (4%) and USA (3%).

Countries supplying protein to TFI Canada, with the exception of the Ukraine, have been identified to have a low prevalence of modern slavery in the livestock sector. There was one supplier from Ukraine, representing 0.4% of total protein spent and is SEDEX audited, therefore considered low risk but included in the assessment. Therefore, we do not consider TFI Canada's protein supply chain to be exposed to a material risk of forced labour from Tier 1 suppliers.

TFI USA

Similarly to TFI Canada, the majority of TFI USA's supply chain -83%- was protein product (2024: 92%), of which 84% (2024: 86%) was imported into the US. 61% of TFI's USA's protein procurement (2024: 62%) was sourced from Australia, 11% (2024: 11%) from Uruguay, and 3% (2024: 44%) from New Zealand; all of which are considered low modern slavery risk jurisdictions. Uruguay has one of the lowest prevalence of modern slavery in the Americas (*Modern Slavery Index 2023*).

TFI USA imported 4% (2024: 2.5%) of its protein supply from Brazil, which is flagged as a medium modern slavery risk region for the livestock sector. These risks have been documented by the US Department of Labor, the ILO and the Modern Slavery Index. TFI USA is aware of these risks, and has taken steps to gain visibility over its higher-risk supplier regions within Brazil. To support its risk management, TFI USA has a 70% SMETA audit coverage for its Brazilian protein suppliers.

TFI USA currently engages in labour hire. However, the company is actively moving towards eliminating labour hire and increase its direct employment and management of its labour force, over the next few years. Labour hire has been identified to have a higher risk in the US compared to Australia, based on a geographical risk factor rating (*Modern Slavery Index 2023*). Therefore, it has been identified as a material area to be assessed for modern slavery in the coming reporting periods, until it is eliminated from TFI USA's operations over time.

Much of TFI USA's protein product is internationally imported, engaging international shipping providers. Please note, the modern slavery risk attached to imported goods from Australia by TFI entities is borne by the TFI Australian operations and Atron, and therefore will be covered by their risk assessment.

Luiten

Luiten 's protein supply chain consists mainly of protein supplies (89%). Of this, the majority of the products originate from New Zealand (27%), Australia (23%), Argentina (14%), and France (14%). With a higher slavery prevalence score of (*Global Slavery Index*), Argentina poses a medium modern slavery risk when compared to other South American jurisdictions. Through third-party SMETA audits, Argentinian suppliers have demonstrated a low risk of modern slavery in their supply chain.

Luiten extensively utilises external labor. All agencies that work with the company must comply with national labour laws and have third-party verification to ensure compliance.

Countries from which Luiten sources seafood, including Bangladesh and India, are flagged as high-risk jurisdictions for modern slavery in fisheries, as well as corruption. SMETA audits have been performed on some suppliers but not all. This has been flagged as a material risk to be addressed in the 2026 reporting period.

KEY FACTORS CONTRIBUTING TO TFI'S INTERNAL RISK LEVEL

Several key factors influence our ability to identify, detect and mitigate the risk of modern slavery in our operations; enabling us to respect worker rights and entitlements, and provide fair and safe conditions of work:

- ☒ **Business expansion model** – As the TFIC business family continues to grow and expand, we have recognised the importance and transparency of a vertically-integrated value chain, and supply chain rationalisation and optimisation.
- ☒ **Operational composition and jurisdiction** – TFIC's primary production and processing operations are in Australia, where we have long-standing partnerships with reputable primary producers. For our US and Canadian operations, TFI USA operates as a processing, packaging and wholesale operation, while TFI Canada is solely a wholesale distribution centre. Luiten supports distribution and sales, as well as value-added services, including custom packaging and product development.
- ☒ **Governance and oversight** – TFI has direct control over its primary production, processing, and supply operations. Our qualified Sustainability team communicates and engages with the Executive Leadership Team, including the COO, CSO and CFO, to ensure close monitoring and active oversight of sustainability risks, including modern slavery, within TFIC's operations and value chain. This enables management and the Board to retain an intimate knowledge of the business, provide vital leadership and direction, and ensure close oversight over the business.

PACIFIC AUSTRALIA LABOUR MOBILISATION SCHEME

TFIC's processing plants across Australia, participate in the PALM Scheme, a valued and essential part of our processing workforce. The Scheme provides participants with skills training and valuable employment experience, while also supporting the TFIC group's extensive labour requirements in the processing plants.

Initiatives to Reduce Modern Slavery Risks in the PALM Scheme

The TFI group strictly follows all employment and welfare laws set out by the Department of Employment and Workplace Relations (DEWR) and the Department of Foreign Affairs and Trade (DFAT), in relation to the PALM Scheme. In addition to regulatory compliance, TFI has implemented several initiatives, below, to reduce the risk of exploitation within the Scheme and support our workers while they're in-country and under our employment.

- Direct employment of PALM Scheme participants by TFI’s recruitment teams.
- All employment documentation is provided in English and local languages.
- TFI provides in-country familiarisation and support sessions.
- TFI appoints wellbeing officers at each location and regularly engages with in-country liaison officers from participating nations.
- During recruitment, leaders are identified, to support their cohort throughout the in-country mobilisation process.
- Once in-country, participants are connected with local church and community groups whom may wish to attend or engage with.

Actions Taken to Assess and Address Modern Slavery

The overall effectiveness of our **Modern Slavery Framework (Figure 3.)** and execution of our **Forward Strategy** will be reviewed and assessed every year to support the annual group’s *Modern Slavery Statement*. Key considerations include:

- ☒ TFI’s reporting compliance to the relevant modern slavery and forced labour Acts, and the applicable TFIC policies and practices.
- ☒ TFI’s progression in its supply chain gap analysis and assessment.
- ☒ Direct supplier performance and compliance.
- ☒ Modern slavery risks, complaints and incidents, remediation and any mitigating actions to prevent modern slavery in our operations and supply chains.
- ☒ Non-conformity and areas for improvement.
- ☒ Board, Executive, staff and supplier training.
- ☒ Governance structures, formalised policies, and accountability levels.
- ☒ Finalisation of implementing “Ethics Point”, and ongoing review of “Speak Up”.

Guided by the **Forward Strategy**, the TFIC group will endeavor to improve the group’s identification, monitoring, measurement and mitigation of modern slavery and forced labour risks. This will include, but not limited to, performance management and traceability of key suppliers. In future reporting periods, supplier compliance will be monitored and assessed as part of our procurement and contract management process, supported by a global sustainability platform and cross-collaboration across TFIC group departments and global entities. However, monitoring and review mechanisms may vary depending upon contract type, significance, and-risk. Mechanisms may include, but are not limited to supplier compliance reports, surveys, contractual reviews, and/or onsite audits.

TRAINING

Board and management training, as well as supplier training, will be addressed during the 2026 calendar year. Supplier training will be attached to the engagement process with our material and higher risk suppliers. Internal training will be developed by the group HR function, with the support of the Sustainability team.

SUSTAINABILITY PLATFORM AND SYSTEMS

During the 2025 calendar year, the TFIC group started the rollout and implementation of a global sustainability platform solution, which will support the TFIC group's sustainability function in the identification, assessment, and mapping of the group's global supply chain. This will significantly streamline and increase the accuracy of our assessment and engagement process with tiered suppliers.

MODERN SLAVERY POLICY

Statement of Intent

The TFIC group is committed to ethical and socially responsible business practices and supply chains that prevent the exploitation of workers, including situations of modern slavery.

TFIC strives to prevent modern slavery and strictly prohibits situations where a person is exploited or cannot refuse or leave work because of threats, violence, coercion, abuse of power, or deception.

Modern slavery performance and risk are regularly reviewed by the TFI Sustainability team. High risks, gaps or issues of major concern are escalated to the TFIC management and the Board for review and to action accordingly.

The TFIC corporate Modern Slavery Policy was updated in 2025.

Objectives

The primary objectives of our Modern Slavery Policy are:

- ☒ To prevent, detect and mitigate the risk of modern slavery in TFIC group's business operations and supply chains.
- ☒ To ensure TFIC entities partner with suppliers who have a shared commitment to ethical and socially responsible business practices and the prevention of the exploitation of workers.

- ☒ To ensure the TFIC group fulfils its annual reporting obligations under the *Modern Slavery Act 2018 (Australia)*, *Modern Slavery Act 2015 (UK)*, *Fight against Forced Labour and Child Labour in Supply Chains Act 2023 (Canada)*, and *California Transparency in Supply Chains Act 2010, Senate Bill 657*

Key Strategies

TFIC has implemented or is currently implementing the following key strategies to meet its commitments and the objectives of our Modern Slavery Policy:

- ☒ Explicit accountability of the TFIC Executive to actively mitigate modern slavery risks within the TFIC group’s business operations and supply chains; and ensure prompt and decisive action to investigate and address any identified or potential breaches of the Policy.
- ☒ In 2025, the TFIC Board is planning to establish a Risk Management governance function and structure to exclusively monitor and assess the group’s risks, including Modern Slavery.
- ☒ Policies which promote ethical and socially responsible business practices, including but not limited to recruitment, labour hire, on boarding, procurement, contract management and supply chain management.
- ☒ Regular monitoring, evaluation, and review of TFI business operations and supply chains to ensure compliance to the Policy and consistency of practices and controls.
- ☒ Developing an open engagement process with our suppliers focusing on traceability, including Modern Slavery.
- ☒ Establishment of a traceability verification, certification and accountability system, supported by a global technological solution to ensure consistency and coverage.
- ☒ 2025 development of an “ethics point”, available to all employees, including PALM, to support staff wellbeing and to provide a clear, independent reporting channel.

MODERN SLAVERY FRAMEWORK

TFIC has a responsibility to identify modern slavery across the group and to introduce additional risk controls and initiatives to further refine and improve our performance.

Figure 3. Thomas Foods International Consolidated - Modern Slavery Framework and Forward Strategy Actions

POLICY (Plan) ▶	PRACTICE (Do) ▶	AUDIT (Check) ▶	REVIEW (Respond) ▶
Code of Conduct	Recruitment Due Diligence	Supplier Checks & Audits	TFI Board Annual Review
Modern Slavery	Approved Supplier Program	Traceability Performance & Audit Register	Ongoing Legislative Review
Ethical Sourcing	Enterprise Agreement	Annual Supplier Surveys	Operational Reviews & Reporting
Purchasing	Industry Award Rates of Pay	Sustainability Platform and Supplier Engagement System	Corrective & Preventative Action
HR and WHS	Safe Work Conditions & Practices		TFI Executive Monitoring
Anti-Bribery and Corruption	Incident & Risk Reporting		
Conflict of Interest	Modern Slavery Contract Clauses		
Disclosures	Tier 1 & 2 Supply Chain Mapping		
EEO & Anti-Discrimination	Sustainability Systems - testing		
Workplace Grievances	Modern Slavery Training		
Whistle Blower and Grievance (to include MS)	Tier 3 Supply Chain Mapping		

Legend

- Implemented
- Ongoing
- Forward Strategy

FORWARD STRATEGY

TFIC is still undertaking its value chain traceability project, including a focus on modern slavery. The following gaps will be addressed in 2026 and going forward as part of our group **Forward Strategy**.

Calendar 2026

- ☒ Continue to respond to actions arising from domestic and international legislative reviews and additions.
- ☒ Continue a robust value chain assessment and verification, across Tier 1 and Tier 2 suppliers.
- ☒ Development and distribution of annual supplier surveys ready for 2026 reporting.
- ☒ Finalisation of Modern Slavery Awareness training, in collaboration with HR teams.
- ☒ Implementation of the TFI sustainability system to support TFIC's value chain traceability, including modern slavery identification, monitoring, verification, and performance certification.
- ☒ Supplier onboarding – sustainability due diligence checks and disclosures.
- ☒ Reissuance of the annual TFIC inter-group Modern Slavery assessment survey.
- ☒ Global CFO and Group Operations Manager to integrate modern slavery into plant managers meeting on a quarterly basis.

Following Years

Priority 1 Areas

- ☒ Creation of a performance and audit register for material and risk-assessed suppliers.

- ☒ Continue deep dive supply chain assessment, obtaining full coverage and oversight of Tier 1 and Tier 2 suppliers.
- ☒ Continued roll out of TFI group sustainability system, including capabilities for modern slavery risk assessments, supplier surveys and training, verification, monitoring, and verified performance management.
- ☒ Develop corrective action request protocols, specific to modern slavery actions – integrated into supplier contracts and survey processes.
- ☒ Finalise *Approved Supplier Lists* for all TFI group entities.

Priority 2 Areas

- ☒ Begin audit schedule for high risk and material suppliers.
- ☒ Assign primary operational accountability for modern slavery to senior site managers through expanded, updated and defined job requirements and descriptions.
- ☒ Provide modern slavery information and assurance to customers upon request (sustainability system driven).
- ☒ Begin Tier 3 supplier analysis and risk assessment.

DUE DILIGENCE

- ☒ TFIC has a **comprehensive suite of Human Resources, Workforce Management and Work Health Safety policies and practices** to ensure we respect worker rights and entitlements and provide fair and safe conditions of work.

- ☒ TFI conducts **due diligence checks of prospective livestock suppliers** who participate in our Thomas Family Guarantee Program (TFG). In addition, suppliers are expected to comply with our *Ethical Sourcing Policy*.
- ☒ **All personnel** are provided the opportunity to **report modern slavery incidents and complaints**. They should also **have the confidence that all reported complaints** will be managed confidentially, investigated, escalated, and dealt with in accordance with our *Workplace Grievances Policy* or *Disclosures Policy* (for whistleblowers or confidential disclosures).

CONSULTATION WITH REPORTING ENTITIES

The TFIC group of companies is operationally managed and controlled by TFIC, with all reporting entities in this joint *Statement* falling under TFIC's Executive and Board oversight. The structure allows for consistency in policy development and execution, which is then filtered down throughout the group from TFIC.

TFI USA, TFI Canada and Luiten participated in the group-wide reporting process, undertaking separate risk assessments of their specific procurement and suppliers. This activity was coordinated centrally out to TFI's Head Office in Adelaide, but regionally executed to ensure appropriate oversight and local knowledge of international supply chains were applied to the assessment. In addition, the corporate sustainability team in Australia consistently communicates with the TFI USA and EU sustainability teams throughout the reporting period, to understand the group's global supply chain characteristics, and the risk levels of their sectors and geographies.

REMEDIATION

TFIC has not identified any circumstances where remediation - related to modern slavery or forced labour occurrences - has been required during the reporting period.

TFIC and its subsidiaries follow the process below where remediation is pertinent:

- ☒ **Corrective and preventive action** is taken to address any identified non-conformance, incidents or risks in our operations and supply chains.
- ☒ The TFI group works in **collaboration with our suppliers** to address any potential risks or areas of concern. **Remediation strategies** may include education and awareness, increased monitoring and reporting, visits to supplier premises and contractual reviews.
- ☒ Learnings are applied across the business and supply chains in line with our **quality management and continual improvement approach**.

OTHER RELEVANT INFORMATION

Modern slavery complaints received in the 2024/2025 reporting period: **NIL**

Modern slavery incidents reported or detected in the 2024/2025 reporting period: **NIL**