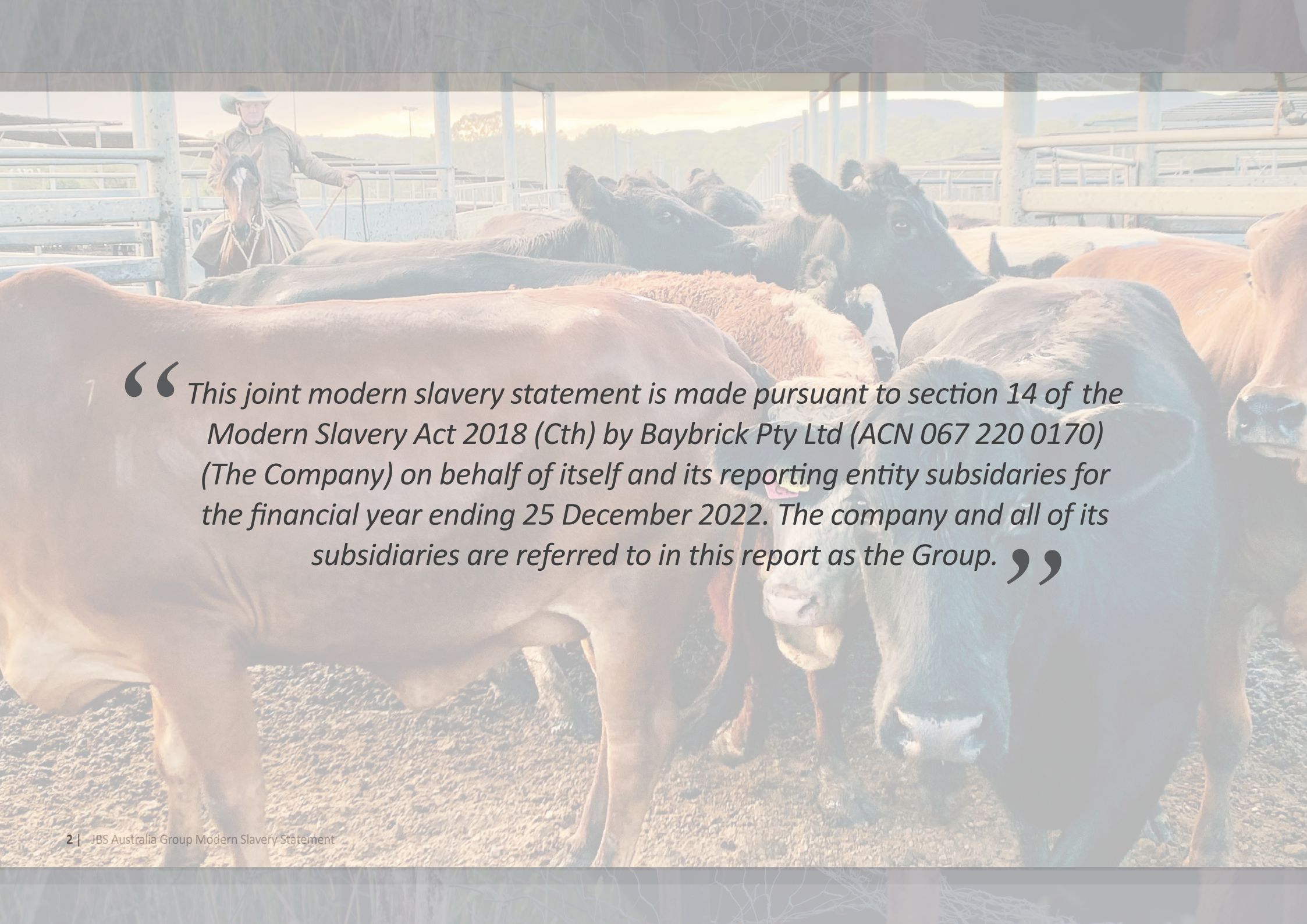




JBS Australia Group Modern Slavery Statement 2022





“ This joint modern slavery statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) by Baybrick Pty Ltd (ACN 067 220 0170) (The Company) on behalf of itself and its reporting entity subsidiaries for the financial year ending 25 December 2022. The company and all of its subsidiaries are referred to in this report as the Group. ”

CEO Message – with Brent

On behalf of the JBS Australia Group I would like to reinforce our commitment to eliminating modern slavery in all its forms. As a company that values the dignity and rights of all individuals, we firmly believe that no one should be subjected to any form of exploitation or forced labour. Unfortunately, modern slavery remains a significant challenge that affects millions of people worldwide, and the food manufacturing industry is not exempt from this problem. We know that preventing and addressing the risk of our own involvement in modern slavery is the first step in the fight against it.

We acknowledge that the complexities of modern supply chains can sometimes obscure these issues, and we recognise the importance of being transparent about our efforts to identify and eliminate any instance of modern slavery in our operations. We understand that our team members, customers, community and other stakeholders expect us to uphold ethical principles and adhere to responsible business practices that ensure the safety and well-being of our workplace and those who work within our supply chains.

We set clear expectations for our team members and suppliers, including contractors. This helps raise their awareness of any possible involvement they have in modern slavery and what they can do to prevent and address it.

To this end, our attached Modern Slavery Statement outlines our commitment to the elimination of modern slavery and meet the intent of the Australian *Modern Slavery Act 2018*. In this statement, we detail our efforts to identify, prevent and address any potential cases of modern slavery in our operations and supply chain. With a diverse supply chain, we ensure the suppliers we choose to work with operate ethically and in accordance with all applicable modern slavery laws. To achieve this, we outline these expectations in our Group Supplier Code of Conduct, our Procedure for Addressing Modern Slavery in the JBS Australia Group Supply Chain (2022), and establishing Sedex relationships and ongoing engagement with our suppliers.

We have also established a robust program of regular auditing and monitoring to ensure that our suppliers are meeting the same high standards as our own operations. Furthermore, we have whistleblowing mechanisms in place and are committed to employee education and continuous improvement that will help us to identify and eradicate any practices that may lead to modern slavery.

As the CEO of the JBS Australia Group, I recognise the urgency of our collective responsibility to eliminate modern slavery. We will continue to work to ensure that our operations meet the highest standards of ethical conduct, and that we contribute to a world that is free from exploitation and forced labour.



A handwritten signature in black ink, appearing to read 'Brent Eastwood'. The signature is stylized and fluid.

BRENT EASTWOOD
CEO JBS Australia Group

Our Commitment

The Group opposes all forms of slavery and forced labour in its operations and the operations of its suppliers.

We are committed to improving our practices to combat modern slavery and we will continue our critical work of feeding the world.



2022 Highlights

- In-depth modern slavery risk assessments conducted on high-risk suppliers and sectors.
- Group Supplier Code of Conduct Commitment signed by multiple suppliers.
- Appointment of a dedicated Risk and Compliance Officer – Modern Slavery.
- ‘Is your workmate a slave?’ campaign rolled out in all Group facilities.
- Modern slavery training undertaken by corporate and support staff via the Learning Management System.
- Procedures for addressing modern slavery in operations and supply chain completed.
- Deep dive assessments carried out in high risk sectors based on risk geography, spend, material or service.



About Our Group

Our Group is Australia's largest meat and food processor with a strong portfolio of leading beef, lamb, pork and fish together with a range of smallgoods and value-added branded products.

The Group is a major supplier of animal protein to Australia and the world, providing strong local employment, career opportunities and export dollars for the Australian economy.

We source products, services and inputs from Australia and around the world to support our food production business.

OUR BELIEFS

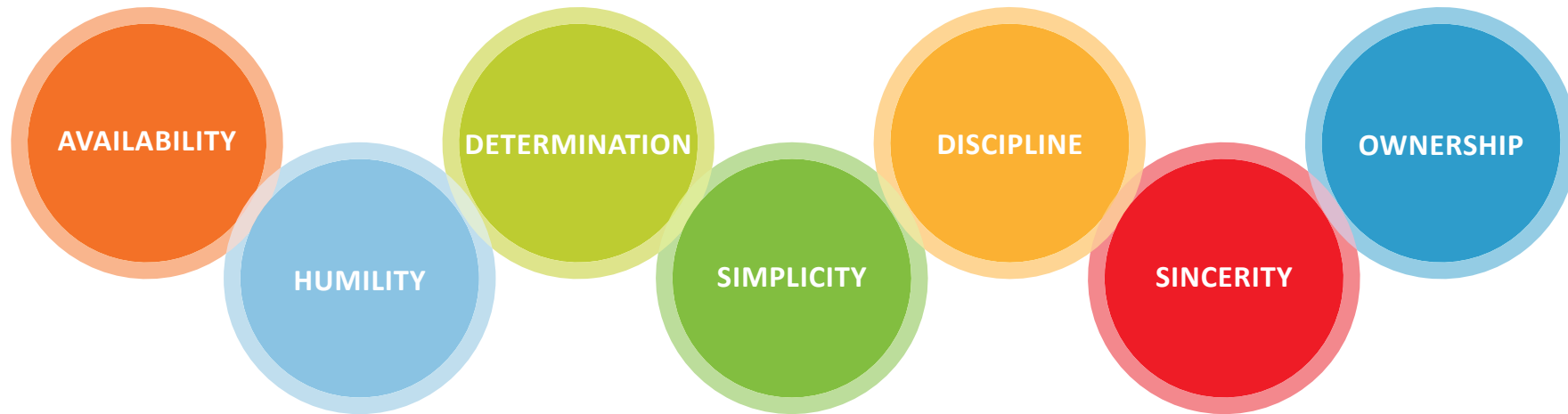
- Focus on the details
- A hands on approach
- Success is only achieved through hard work
- The right people in the right place
- Passion for what we do
- Actions and behaviour are more important than knowledge
- A leader must win over their team members
- Lead by example
- Focus on results
- Working with people who are better than us
- Believing makes the difference
- Quality products

Our Mission

To be the best in what we do, completely focused on our business, ensuring the best products and services to our customers, a relationship of trust with our suppliers, profitability for our shareholders and the opportunity of a better future for all of our team members.



Our Values



● AVAILABILITY

- Be receptive and open
- Always be prepared and motivated to take on new challenges

● HUMILITY

- Listen
- Be helpful and thoughtful
- Act with respect
- Prioritise the team over yourself

● DETERMINATION

- Be relentless
- Deliver superior results
- Adopt a sense of urgency
- Make things happen

● SIMPLICITY

- Be practical
- Focus on what is important
- Adopt a hands-on approach
- Avoid bureaucracy

● DISCIPLINE

- Be punctual
- Fulfil commitments
- Deliver results
- Do not make excuses

● SINCERITY

- Be direct, truthful and transparent
- Respectfully express your opinion
- Know how to say no, but be positive and offer solutions

● OWNERSHIP

- Be committed to results
- Focus on details
- Take responsibility

Structure

The Group is comprised of private companies controlled or majority owned by JBSSA, a company incorporated and listed in Brazil.

The Group includes:

- Baybrick Pty Ltd
- JBS Australia Pty Ltd
- Diamond Valley Pork Pty Ltd
- Primo Foods Pty Ltd
- Andrews Meat Industries Pty Ltd
- White Stripe Foods Pty Ltd
- Industry Park Pty Ltd
- Premier Beehive Holdco Pty Ltd
- Rivalea (Australia) Pty Ltd
- Rivalea Holdings Pty Ltd
- Australian Consolidated Food Holdings Pty Ltd
- JBS Aquaculture Pty Ltd
- Huon Aquaculture Group Pty Ltd
- Huon Aquaculture Company Pty Ltd
- JBS Australia Finance Pty Ltd
- JBS Australia Finance 1 Pty Ltd

The main activities of the Group take place in Australia and New Zealand where the Group employs more than 14,000 team members, who have a diverse range of skills and a strong team culture.

There are subsidiaries of our robotics and automation business which operate in Germany, Belgium, the Czech Republic, UK, France, China, the United States of America and Uruguay.





Stakeholders



Management Responsibility



Business Process

Delegation of Authority
Chief Executive Officer
Executive Management

JBS Corporate Culture & Values

Integrated Risk Management



Modern Slavery Steering Group

In 2022 the Modern Slavery Steering Group expanded to include representation from the Group's business units. This expansion occurred to increase collaboration and coordination across business units on the identification and implementation of recommendations from Modern Slavery Risk Assessments in a timely manner. The expansion signified the growing commercial awareness of the modern slavery risk across the Group.





Supply Chain

The Group's supply chain has an extensive domestic and international footprint. Suppliers to the Group are diverse.

Examples include:

- Farmers and operators of feedlots
- Suppliers of meat and by-products
- Suppliers of grain and animal feed
- Overseas suppliers of fishmeal and fish feed
- Suppliers of spices and flavourings
- Suppliers of chemicals
- Suppliers of cold storage
- Domestic and international suppliers of land and maritime transportation and logistics services
- Service providers provide us with:
 - Recruiting and labour solutions
 - Cleaning, security, maintenance and construction
 - Engineering, IT, marketing, health and other professional support services
 - Logistics and cold storage

The majority of suppliers in the Group's direct supply chain (by spend) are incorporated in Australia or have operations here.

On occasion, services (for example, IT and recruitment) are delivered offshore. Some products such as packaging, production equipment, ICT hardware, logistics and pork can be produced overseas.

The Group engages with suppliers through different forms of contracts, ranging from one-off, short-term contracts to long term umbrella arrangements.

The Group holds certifications across several sectors.



Modern Slavery

Policies and Procedures

The Group has a suite of policies and procedures outlining the zero-tolerance to modern slavery practices in operations and in the supply chain. Over 2022 the Group produced a procedures document for the handling of potential cases of modern slavery and updated the Social Responsibility Policy to specify the focus on modern slavery.



JBS Modern Slavery Policy and Procedures



Social Responsibility Policy

- Modern slavery
- Human rights in the supply chain
- Child labour, forced or compulsory labour
- Ethical Trading Initiative (ETI) Base Code



Group Supplier Code of Conduct

Labour and human rights

JBS suppliers must:

- Comply with the United Nations Principles on Business and Human Rights
- Comply with 10 principles of the United Nations Global Compact
- Comply with core International Labour Organization (ILO) conventions
- Suppliers must not use slave, child or forced labour



Group Code of Conduct and Ethics

- JBS forbids the use of child or forced labour
- Ethics Hotline



Group Supplier Code of Conduct Commitment

JBS suppliers must:

- Comply with all laws including the requirements of their modern slavery legislation



Procedure for Addressing Modern Slavery in the JBS Australia Group Supply Chain (2022)

Responding to modern slavery in:

- Group facilities
- A supplier's operations in Australia
- Offshore in the global supply chain

Risks

This modern slavery statement outlines the risk of modern slavery in operations and in the supply chain. During the reporting period risks were identified and managed in both areas. The Group's modern slavery priorities for 2022 were based on risks identified internationally.



Fishmeal

Risk - Illegal, unreported and unregulated (IUU) fishing vessels using forced labour.



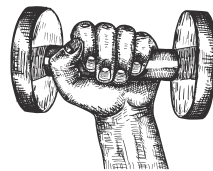
Spices & Flavourings

Risk - Forced and child labour is used on spice plantations.



Cleaning Contractors

Risk - Cleaners working for cleaning contractors are subject to debt bondage or deceptive recruitment.



Labour Hire

Risk - (Domestic & International) Workers from labour hire companies in Group facilities or in suppliers' overseas sites are subject to debt bondage or deceptive recruitment.

Actions Taken to Address the Modern Slavery Risk

The four key modern slavery risks identified by the Group were the subject of intense risk analysis and risk mitigation.

FISHMEAL



A key component of the fish feed used in the Group's aquaculture operations is fishmeal made from small pelagic fish such as the Peruvian anchovy caught in the waters of Peru and Chile. Modern Slavery Risk Assessments conducted by the Group identified modern slavery risks in two areas:

- 1) Fishmeal used in fish feed for farmed salmon in Group operations in Australia; and,
- 2) Fishmeal used in fish feed for Chilean farmed salmon purchased by the Group.

The Group approached the Australian fish feed supplier to provide details of their overseas supply chain and the source of their fishmeal. While a percentage of the fishmeal was sourced from Australian waters, the majority of the fishmeal was imported.

Fishmeal suppliers in Peru and Chile do monitor their catch and utilise certification processes in sourcing their raw marine materials however a vulnerability existed in the suppliers' use of third parties to supplement their supply.

The third party catch represents a modern slavery risk. The coastlines of Peru and Chile are vulnerable to Illegal, Unreported, and Unregulated (IUU) fishing vessels operating in their waters. IUU fishing has a high risk of forced labour.

The Australian fish feed supplier agreed to collaborate with the Group in 2023 on a joint modern slavery risk assessment of their overseas suppliers of marine ingredients, primarily fish meal. The Group also engaged with its Spanish-speaking intermediaries in Chile to ensure that suppliers provided social responsibility and human rights policies to the Group.



SPICES & FLAVOURINGS



Spices and flavourings were identified as a key modern slavery risk. The Group focused on five key suppliers of spices and flavourings in FY2022 to identify the primary source of the spices they provided to the Group.

Two suppliers were supportive of the Group's approach to them. One joined Sedex and completed a Self-Assessment Questionnaire, the second provided details of the second tier of the supply chain. Their spices had been supplied by two Australian businesses. Follow-up activity was commenced during 2022 with the upstream suppliers to map the third tier, the overseas spice traders and merchants. The largest supplier of spices and flavouring to the Group did not reply. The matter was referred

to the Modern Slavery Steering Group to plan further action for non-compliant or non-responsive suppliers.

The smaller spend spice suppliers will be the focus of activities in the 2023 reporting period.



CLEANING CONTRACTORS



The cleaning industry is known to be a high-risk sector for worker exploitation and modern slavery.

The Group identified the sector as a priority due to the use of cleaning contractors in Group facilities. Cleaning activity takes place in facilities after Group staff have left, usually from 9pm to 5am. This makes it difficult to have visibility of the contracted workers.

An initial modern slavery risk assessment was conducted on two cleaning companies used by the Group.

A Modern Slavery Audit questionnaire was developed for the cleaning companies.

An unannounced Modern Slavery Audit will be conducted in the first half of 2023 on a cleaning company in regional South Australia.



LABOUR HIRE



The labour hire sector has a higher risk of modern slavery, particularly deceptive recruitment and debt bondage. The Group use several labour hire companies and Sedex SMETA audits have been conducted.

The Group has worked closely with labour hire companies to implement corrective actions following SMETA audits.

A Modern Slavery Audit questionnaire was also developed for use with labour hire suppliers.

Modern Slavery Audits will be conducted on two labour hire suppliers in regional South Australia in the first half of 2023.

Additional Modern Slavery Risks

In addition to the priority risks endorsed by the Group's Modern Slavery Steering Group are those identified as high-risk suppliers in the Fair Supply assessment, or those identified in ongoing risk analysis conducted by the Group's Risk and Compliance Officer, a modern slavery specialist.

These include:

- Beef traded from Paraguay
- Shipping
- Clothing
- Lactate production in Thailand
- Labour hire workers in overseas processing plant

Beef Traded from Paraguay

A business unit in the Group trades in multiple commodities internationally including beef from Paraguay.

The beef is traded with customers in Asia and does not enter the Australian supply chain. A modern slavery risk assessment was conducted on livestock in Paraguay and it was found that a high risk of modern slavery existed in that sector.

Modern slavery in Paraguay is characterised by three main forms:

- (1) Debt bondage of Indigenous workers on ranches in the Chaco region;
- (2) The Criadazgo (child servitude) system nationwide;
- (3) Forced labour in the agricultural sector.

The Group's Risk Team is working with the business unit to address the issue with the Paraguayan supplier.



Shipping

There is a risk that seafarers on board container ships are at risk of deceptive recruitment or debt bondage through the manning agencies that supply them as labour.

Initial consultation has taken place with ANL's Anti-Modern Slavery Officer on their practices to assess risk with foreign manning agencies.

Further work will be conducted by the Risk Team in 2023 with other shipping lines.

Clothing

The clothing sector represents a modern slavery risk both in the growing of cotton and other natural fibres, and in the production of clothing. Modern slavery risks may be present across the entire, multi-faceted supply chain, for each item of clothing (buttons/zippers/cut and trim). The Group will ensure that suppliers of workwear responsibly source their materials.

Lactate Production In Thailand

Due to the proximity of the supplier's plant to the Cambodian border, there was a risk of Cambodian workers being trafficked for labour exploitation or being in debt-bondage to recruiters.

An initial assessment identified a medium risk of modern slavery. A desktop risk assessment was conducted on the supplier and plant.

The plant upholds the United Nations Sustainable Development Goals and the parent company has extensive policy on human rights and modern slavery. The risk was revised and assessed as low. The Group will monitor the supplier for any change in the risk profile.



Labour Hire Workers in Overseas Processing Plants

A modern slavery risk was identified with workers in pig processing plants in the European Union.

The risk was identified in a supplier's completed Sedex Self-Assessment Questionnaire.

The supplier is being monitored.



Actions Taken To Reduce the Modern Slavery Risk

Buyer Membership of Sedex

The Group became a Buyer / Supplier (AB) member of Sedex and began the onboarding process of higher risk suppliers. The Risk Team analysed the Self-Assessment Questionnaires (SAQ's) provided by suppliers and noted indicators of trafficking in one SAQ. Follow-up action was taken including the preparation of a modern slavery risk assessment on the supplier and recommendations to the Group on further action.

Several Sedex SMETA audits were conducted on Group sites during the reporting period. The Group's sites worked closely with the labour agencies to align their processes with ETI Base Code standards.

Modern Slavery Awareness Raising

The Group carried out the campaign, 'Is your workmate a slave?', in sites throughout Australia.

A series of slides targeted at frontline staff were shown on monitors in communal areas such as canteens. The aim of the campaign was to make workers aware of modern slavery risks and indicators that may exist in their community.

The Group has a culturally diverse workforce including employees, contract workers, international recruits, and Pacific Australia Labour Mobility (PALM) scheme workers.

Staff training about modern slavery risks and indicators was carried out with salaried staff across the Group on the Learning Management System.



The Campaign Included a Poster to be Displayed in Workplaces



Internal Consultation

Modern slavery awareness raising and discussions were held with those involved in the procurement process. This made them aware of why their suppliers were identified as a higher risk of modern slavery due to heightened risks in the agricultural sector. This risk is located within the production of feed for livestock and the manufacture of fertiliser, rather than in the rearing of livestock. The Group's modern slavery specialist briefed the Group Procurement team on the modern slavery risks in the Group's supply chain.

Collaboration

Australian businesses have a shared purpose in combatting modern slavery in their supply chains and operations. Central to this is collaboration between businesses.

The Group has seen value in pursuing collaborative liaisons with other modern slavery and procurement specialists in the shared supply chain to encourage:

- Exchanging methodologies on modern slavery identification
- Sharing experiences of onboarding suppliers to Sedex
- Developing best practice

Challenges

A key challenge associated with mapping the supply chain has been the unwillingness of many suppliers to accept the invitation to join the Group's nominated supply chain ethics and compliance platform.

Some suppliers have expressed 'questionnaire fatigue' associated with the number of requests they receive from customers to complete modern slavery questionnaires.

Suppliers are reluctant to provide specific details on their overseas activities.

The Group has been persistent with its approaches to high-risk suppliers and is working with them to encourage the completion of questionnaires and provision of information. Where we are unsuccessful in receiving information, deep dives into the suppliers' operations are undertaken.



Measuring Success

The Group measured the effectiveness of its strategies and actions through:

- Quarterly meetings of its Modern Slavery Steering Group.
- Monitoring any modern slavery breaches reported through the Group's hotline.
- Recording the number of Group team members that have participated in the Group's internal training programs.
- The Modern Slavery Risk Assessments produced and disseminated to the Group.

The Group will carry out the following activities in 2023:

- Conduct community engagement with regional communities, raising awareness of the modern slavery risk in the communities that we operate in.
- Build the capacity of procurement teams in the Group to be able to undertake modern slavery risk assessments on suppliers, commodities and services.
- Develop a contingency plan for the replacement of business-critical suppliers involved in modern slavery.
- Map Tier 2 suppliers in high risk categories.
- Collaborate with industry peers to jointly address modern slavery risks in shared supply chains.
- Conduct modern slavery awareness training for all new team members.



Future Vision

JBS Modern Slavery Strategy and Road Map 2023 – 2025

In 2022 the Group developed the JBS Modern Slavery Strategy and Road Map 2023 – 2025.

The Group will use the strategy to guide activities for the next three years and to build sustainable structures and processes to reduce the modern slavery risk in operations and in the supply chain.



Reporting Entities

The following Group entities are considered reporting entities under the Modern Slavery Act, and this statement has been approved by the Board of Directors of each of these companies:

Baybrick Pty Ltd	16 June 2023
JBS Australia Pty Ltd	16 June 2023
Primo Foods Pty Ltd	16 June 2023
Andrews Meat Industries Pty Ltd	16 June 2023
White Stripe Foods Pty Ltd	16 June 2023
Industry Park Pty Ltd	16 June 2023
Australian Consolidated Food Holdings Pty Ltd	16 June 2023
Premier Beehive Holdco Pty Ltd	16 June 2023
Rivalea Holdings Pty Ltd	16 June 2023
Rivalea (Australia) Pty Ltd	16 June 2023
Diamond Valley Pork Pty Ltd	16 June 2023
JBS Aquaculture Pty Ltd	16 June 2023
Huon Aquaculture Group Pty Ltd	16 June 2023
Huon Aquaculture Company Pty Ltd	16 June 2023
JBS Australia Finance Pty Ltd	16 June 2023
JBS Australia Finance 1 Pty Ltd	16 June 2023



BAYBRICK PTY LTD

(ACN 067 220 017)

INDUSTRY PARK PTY LTD

(ACN 007 256 215)

JBS AUSTRALIA PTY LTD

(ACN 011 062 338)

ANDREWS MEAT INDUSTRIES PTY LTD

(ACN 600 428 537)

DIAMOND VALLEY PORK PTY LTD

(ACN 095 045 695)

AUSTRALIAN CONSOLIDATED FOOD HOLDINGS PTY LTD

(ACN 152 947 101)

PRIMO FOODS PTY LTD

(ACN 002 781 142)

PREMIER BEEHIVE HOLDCO PTY LTD

(ACN 609 698 606)

RIVALEA HOLDINGS PTY LTD

(ACN 609 968 989)

RIVALEA (AUSTRALIA) PTY LTD

(ACN 004 892 835)

JBS AQUACULTURE PTY LTD

(ACN 653 348 700)

HUON AQUACULTURE GROUP PTY LTD

(ACN 114 456 781)

HUON AQUACULTURE COMPANY PTY LTD

(ACN 067 386 109)

JBS AUSTRALIA FINANCE PTY LTD

(ACN 609 765 371)

JBS AUSTRALIA FINANCE 1 PTY LTD

(ACN 609 968 989)

HUGH BRENT EASTWOOD

DIRECTOR



DATE: 16th June 2023

WHITE STRIPE FOODS PTY LTD

(ACN 105 781 977)

MATTHEW LYNE

DIRECTOR



DATE: 16th June 2023



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