



1. Introduction

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) for the reporting period January 2024 – December 2024.

Where the term 'modern slavery' is used, it has the meaning given to it under section 4 of the Act.

Since the publication of our last modern slavery statement, we have advanced our understanding of the risk of modern slavery across our operations and supply chain. We have continued to develop our understanding of key modern slavery risks through additional and more comprehensive analysis of our supply chains.

We remain fully committed to meeting our obligations under the Act and to continuous improvement in our approach to addressing modern slavery.

With support from specialists and technology providers within the modern slavery space, we undertook a detailed analysis of the risk of modern slavery in our operations and our supply chains. This analysis has proven valuable in establishing a clear strategy for implementing focused, industry-specific initiatives aimed at mitigating modern slavery risks in the coming years.

Hewitt is committed to engaging with the risks that were identified in the analysis, alongside key stakeholders across our business, including our employees, subsidiaries, business partners and suppliers. Hewitt is alert to the importance of modern slavery risk management, and ensures that it comprises a meaningful part of Hewitt's broader risk management framework.

Although we are pleased with the progress we've made with regards to the identification and address of modern slavery risk in our operations and supply chain, we recognise that more can always be done. Indeed, our status as a global supplier of high-claims protein means that we are well positioned to address modern slavery risk alongside key external stakeholders.

Hewitt is on a journey to become the world's most sustainable meat producer. We recognise that this commitment requires us to focus on the risks of modern slavery within our operations and supply chain, and ensure that our commitment to sustainable practices extends to ensuring that workers in our supply chain are treated well.

This statement outlines the risks associated with modern slavery identified in our operations and supply chain. It also identifies the steps we have taken, and intend to take moving forward, to address these risks.

2. Identity of Reporting Entity

This statement is 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
- Hewitt Foods Pty Ltd ACN 158 956 864 (**Hewitt Foods**).

Each of these companies is a 'reporting entity' within the meaning of that term under section 5 of the Act. In this statement, Sapphire Cattle, Hewitt Agribusiness and Hewitt Foods are collectively referred to as **Hewitt, we, us** and **our**.

This statement also addresses the modern slavery risk within Hewitt's controlled entities in the United States of America, including Hewitt Foods USA, LLC and HF Vermont, LLC.

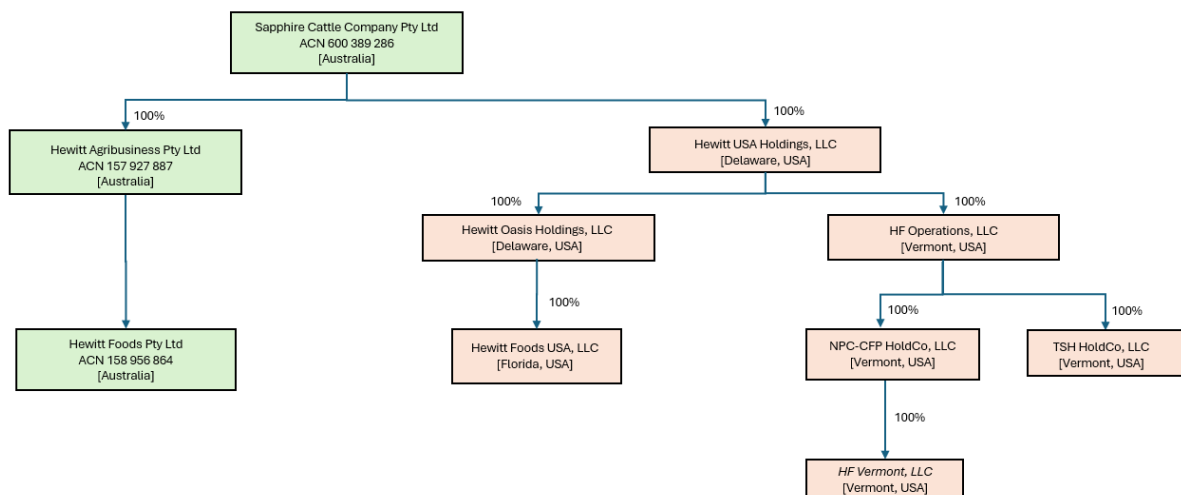
3. Structure, Operations and Supply Chain

Structure and Operations

Hewitt is a leading Australian producer of organic livestock and premium certified organic and free-range meat products. Hewitt distributes its branded products across Australia and internationally. Additionally, Hewitt supplies bulk organic and natural meat products to domestic wholesalers and overseas partners in the USA, Asia and the Middle East.

As described above, Hewitt comprises three distinct reporting entities, each accountable for specific areas of the organisation's operations:

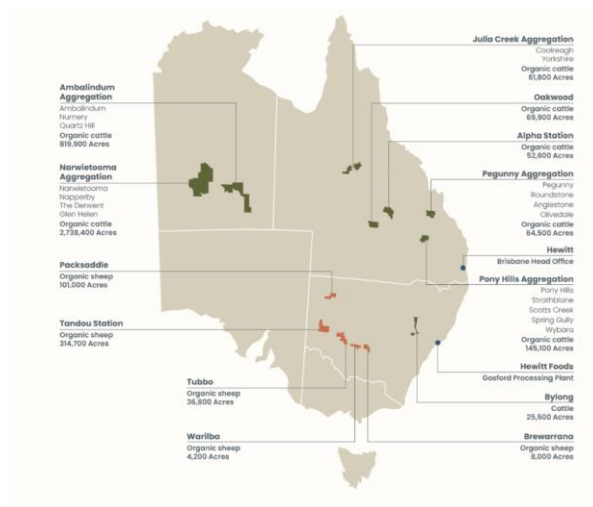
- Sapphire Cattle is primarily a holding entity for the assets of the Hewitt business;
- Hewitt Agribusiness oversees the cultivation and production of cattle as well as other agribusiness operations; and
- Hewitt Foods is responsible for the manufacture and sale of meat products to both commercial and retail customers.





We employed approximately 218 staff on average across the organisation throughout the reporting period. These staff worked across our various pastoral properties in Queensland, New South Wales, and the Northern Territory. They also worked in our commercial offices in Brisbane as well as our meat processing facility in New South Wales.

During the reporting period, we employed 4 workers under Australian visas. As an approved sponsor, Hewitt fulfils all its obligations toward visa workers by ensuring equal terms and conditions of employment and by avoiding discriminatory recruitment practices. Hewitt also obtains migration advice from a law firm who engages Registered Migration Agents and specialist immigration lawyers.



Hewitt operates under a robust governance structure, with a Board comprised of the Group CEO, the Chief Executive of Agribusiness and a range of experienced and qualified non-executive directors with considerable governance and industry expertise. The Board is supported by an experienced Executive Leadership Team.

Hewitt has operations in the United States undertaken through HF Vermont, LLC and Hewitt Foods USA, LLC, which conduct downstream value-add meat processing and retail distribution.¹

Supply Chain

Hewitt's supply chain covers both 'upstream' and 'downstream' aspects of the business. Hewitt Agribusiness is principally responsible for the upstream operations, which includes the procurement of goods and services such as feed, cattle transport, contract musters, and farming plant and equipment.

The majority of the suppliers engaged by Hewitt Agribusiness are based in Australia.

¹ During the reporting period, Hewitt held a minority and non-controlling interest in HF Vermont, LLC (then known as NPC Processing, LLC).



Livestock is then sold 'downstream' to Hewitt Foods. Hewitt Foods handles the manufacture and sale of branded retail-ready meat products to domestic and international retailers, as well as branded and un-branded meat products used by third parties as ingredients in their own branded products.

Hewitt Foods' upstream supply chain includes the acquisition of livestock, raw materials, finished goods, processing equipment, service contractors, packaging, cold storage materials, freight and logistics, as well as professional and administrative services. The majority of raw materials are sourced from Australia, while select secondary ingredients are sourced from international suppliers.

In respect of the US Operations, our supply chain predominantly includes the procurement of fresh and frozen boxed meat from Australia and South America, and direct sales to customers.

4. Modern Slavery Risks in Operations and Supply Chain

Risks in our Operations

We recognise that risks associated with modern slavery may exist in both our operations and supply chain. Based on our comprehensive modern slavery risk assessment, we have determined that our exposure to risks of modern slavery for the reporting period remains low. This is in large part due to the fact that the majority of our operations are based in Australia, a country identified by the 2023 Global Slavery Index (**GSI**) as having a low prevalence of modern slavery.

We support safe and ethical workplaces through our policies and procedures, strengthening our approach to managing modern slavery risks in our operations.

Hewitt has a well-resourced People and Culture Team who oversee recruitment and compliance with labour laws. Hewitt directly employs the majority of its workers on contracts of employment which are underpinned by an enterprise agreement endorsed by the Fair Work Commission. Hewitt also has robust recruitment processes in place to meet the seasonal labour demands.

Hewitt adopts strict processes to ensure staff are paid correctly, and work only reasonable hours. In addition, both internal grievance channels and external whistleblower platforms are available for employees, their families, and other stakeholders to anonymously raise concerns. Information about these mechanisms is shared regularly with staff. Hewitt avoids indirect employment arrangements where possible and seeks to limit the use of third-party labour hire.

Hewitt's pastoral properties continue to be certified organic by the Regenerative Organic Alliance (**ROC**). Obtaining this certification requires adherence to strict criteria with respect to worker fairness, including annual third-party audits to validate compliance. Many of the core requirements of ROC certification are wholly analogous with modern slavery standards. For example, the 'Farmer and Workers Fairness' pillar explicitly prohibits forced labour and requires equal and fair worker pay. Maintaining



our ROC certifications contributes to our belief that the risk of modern slavery in our operations is minimal.

Alongside ROC audits, we also conduct Sedex Members Ethical Trade Audits to further validate that our operations remain ethical and provide safe conditions for our workforce.

In the US, Hewitt's practice is to directly employ the majority of its workforce on terms and conditions of employment that are compliant with the relevant labour laws. In our wholly owned US operations, Hewitt largely replicates its frameworks for fair treatment, grievance handling and preference for direct employment of its workers as part of our efforts to mitigate modern slavery risk.

Risks in our Supply Chain

In order to prepare this statement, Hewitt engaged an independent industry expert to conduct a quantitative assessment of modern slavery risk in our supply chain for the reporting period. The assessment was weighted based on our annual expenditure with Tier 1 suppliers and gave Hewitt an estimated number of individuals in forced labour per million dollars spent across the entire supply chain. The methodology for this review is outlined in Annexure A.

The purpose of this analysis was to comprehensively map our supply chain and identify potential modern slavery risks from our direct suppliers through to the tenth tier of our supply chain and beyond. Several factors were examined to determine elevated risks with our operations and supply chains, including:

- Total supplier spend (i.e., the value of our direct supplier contracts);
- Sector classification and the industries that feed into them further down the supply chain; and
- Depth of 'tiering' within the supply chains.

This baseline analysis will be used to prioritise activities in subsequent reporting periods. The analysis for 2024 was conducted in conjunction with 2025 analysis, enabling trend analysis to be undertaken. This analysis will be considered to identify themes and focus areas.

Consistent with our expectations, the analysis of 2024 spend has affirmed our view that overall risk of modern slavery within our supply chain is low.

The overwhelming majority of Hewitt's suppliers are entities based in Australia. Due to Australia's robust regulatory framework, these suppliers are less likely to have occurrences of modern slavery within their respective operations. Notwithstanding, we also undertook in-depth analyses of our sector and geographic risk to further understand our exposure to modern slavery risk, in particular with respect to our international suppliers.



Sector Risk

Given that most of our supplier spend is directed towards cattle acquisition, the cattle and meat product sectors were identified as presenting the most significant risk modern slavery in our supply chain.

The risk profile of this sector is increased as a result of the prevalence of transient employment arrangements in this industry (such as contract mustering, seasonal work, and vulnerable migrant workers working in Australia on visas or through the PALM scheme).

We are cognisant of this sector risk and mitigate it by maintaining long standing relationships with Australian-based suppliers who reflect our commitment to fair treatment of workers. The majority of our suppliers have third party certification through ROC or Sedex, which provides external third party validation.

We are confident, as such, that our overall sector risk is low.

Geographic Risk

The overwhelming majority of our direct suppliers do not present a geographic risk.

However, the scope of our supply chain extends to suppliers located in regions such as the USA and South America. These areas are recognised by the GSI as having relatively higher incidences of modern slavery than Australia. Accordingly, these regions present increased modern slavery risk. We acknowledge this heightened risk profile and intend to collaborate closely with suppliers in these locations to gain further insight into their approaches to managing modern slavery risk, and undertake further due diligence when engaging with these suppliers.

The fact that Hewitt operates both upstream and downstream in our supply chain also affords us greater visibility and control over modern slavery risks. This is heightened by the fact that two of our largest suppliers by spend to our downstream business are our own upstream operations.

Notwithstanding this, there is an elevated risk of some of our suppliers for our US operations, primarily cattle producers, being engaged in modern slavery practices, by virtue of the geographic risk associated with those suppliers.

5. Assessing and Addressing our Modern Slavery Risks

Hewitt has conducted an in-depth, comprehensive modern slavery risk assessment of our operations and supply chain.

In response to the findings of this assessment, we are reviewing strategies and procedures designed to assess and address the risks of modern slavery in our operations and supply chain. These measures aim to maintain Hewitt's vigilance



through due diligence regarding modern slavery risks, and also to remediate any instances of modern slavery should they arise.

Hewitt's Modern Slavery Policy remains the primary policy to educate employees on Modern Slavery. It also serves to contextualise the policies and procedures which Hewitt seeks to implement at an organisational and employee level to reduce the risks of modern slavery.

As outlined in our previous modern slavery statements, Hewitt maintains secondary policies and procedures to help mitigate modern slavery risk throughout its operations, including:

- a Code of Conduct that defines the principles by which Hewitt deals with its stakeholders and otherwise does business. Hewitt's employees, contractors and directors are required to act ethically and maintain Hewitt's high standards of professionalism as set out under the Code of Conduct,
- Health and Safety Systems developed to inform and safeguard Hewitt's employees and contractors, supporting both their mental and physical well-being;
- Recruitment policies designed to embed fairness and equality at every stage of the recruitment process;
- Grievance and Whistleblower Platforms, offering avenues for employees and other stakeholders to raise concerns with Hewitt either directly or anonymously. These concerns are received by our Governance or People, Safety and Culture teams, with independent external support where necessary;
- Remuneration Processes which ensure that both employee remuneration and hours worked are closely monitored; and
- In-house legal advisors to monitor compliance and advise in respect of risk and legislative change, with support from specialist external advisors; and
- Governance Structures that foster awareness and education on modern slavery, including a risk committee knowledgeable on modern slavery risks.

6. Assessing Effectiveness and The Way Forward

Hewitt recognises that combatting modern slavery requires continuous improvement via the frequent evaluation of the efficacy of our efforts in addressing modern slavery risk. In assessing the effectiveness of our measures, and further addressing our exposure to modern slavery risk in our operations and supply chain, we strive to promote open and transparent communication with our suppliers and other relevant stakeholders.

In the upcoming reporting period, we aim to:



- Review and refine our policies to support our approach to addressing modern slavery risks in our operations and supply chain;
- Build on existing processes to further develop a risk-based approach to identifying modern slavery risks;
- Strengthen internal awareness, understanding and capability in relation to modern slavery risks;
- Continuously improve our approach to addressing identified modern slavery risks, in a manner informed by internal review and external 'best practice';
- Consider opportunities to further embed modern slavery considerations into our supplier engagement and procurement process; and
- Monitor regulatory developments to inform our approach to modern slavery reporting and risk management.

7. Consultation

This statement was developed following internal consultation within Hewitt. As the same management team is responsible for the Reporting Entities and Hewitt's controlled entities, formal consultation was not necessary. The collaborative process engaged in by Hewitt is sufficient in light of the oversight and control the Hewitt management and Board exercises across the Hewitt Group.

8. Statement of Approval

This statement was approved by the Board of Sapphire Cattle Company Pty Ltd on behalf of the reporting entities outlined in Part 2 of this Statement, on 26 May 2026. In approving this statement, I confirm the statement addresses each of the mandatory criteria outlined under section 16 of the Act.

DocuSigned by:

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Michael Hewitt
CEO



Annexure A – Supply Chain Mapping Methodology

As discussed in Part 4 of this Statement, we applied the initial risk assessment methodology to our suppliers. Incorporating company spend data throughout global markets, we have utilised external consultants with proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of Hewitt's top suppliers by spend.

This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:

- The United Nations' (UN) System of National Accounts;
- UN COMTRADE databases;
- Eurostat databases;
- The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
- Numerous National Agencies including the Australian Bureau of Statistics.

The MRIO is then examined against the following international standards:

- The UN Guiding Principles on Business and Human Rights;
- The Global Slavery Index;
- International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
- The United States' Reports on International Child Labour and Forced Labour.

A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier.

This analysis was performed for the purposes of risk identification under the Act. It does not purport to confirm the actual existence (or non-existence) of slavery Hewitt's supply chains and operations. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.

The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:



- The individual suppliers and industries with the most elevated risk of modern slavery;
- Supply chain plots to provide a visual representation of the supply chains for Hewitt's top 3 first tier industries;
- Plotting the relative slavery risk in the supply chain by tier, up to tier 10;
- Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world; and
- An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk.
- Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified.