



IT'S AUSTRALIAN FOR SEAFOOD™

*sustainably feeding tomorrow*

MODERN SLAVERY  
ACT STATEMENT  
2024

**Cooke**

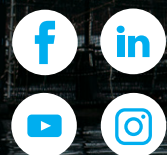
..... *Farmers of the ocean & land*



*sustainably feeding tomorrow*

## FORWARD LOOKING STATEMENT

This report contains forward-looking statements about plans, strategies and management objectives. No representation, warranty or assurance (express or implied) is given, made or implied by Tassal Group that the forward-looking statements contained in this report are accurate, complete, reliable or adequate, or that they will be achieved or prove to be correct. Except for any statutory liability which cannot be excluded, Tassal Group and its respective officers, employees and advisers expressly disclaim any responsibility for the accuracy or completeness of the forward-looking statements and exclude all liability whatsoever (including negligence) for any direct or indirect loss or damage that may be suffered by any person as a consequence of any information in the forward-looking statements or any error or omission from them.



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## ACKNOWLEDGMENT OF COUNTRY

We acknowledge the Traditional Owners of country in which we operate, and we recognise their connections to land, sea and community. We pay our respect to their elders past and present and recognise that Australia is home to the oldest cultural tradition in the world.

*Farmers of the ocean & land*

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## CEO message

**I AM PROUD TO DELIVER OUR FIFTH ANNUAL MODERN SLAVERY STATEMENT FOR THE TWELVE-MONTH REPORTING PERIOD FROM 1 JANUARY 2024 TO 31 DECEMBER 2024. THIS STATEMENT REFLECTS ON OUR ONGOING COMMITMENT AND ACTION TO UNDERSTAND, IDENTIFY AND ADDRESS THE RISK OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN.**

As Australia's largest seafood producer and processor, we recognise that producing healthy and nutritious seafood comes with great responsibility. Whether farming on land or at sea, we are dedicated to being a responsible seafood business. We acknowledge our role in respecting our people, the environment and the communities we operate within as we deliver our vision of sustainably feeding tomorrow.

At Tassal, we are steadfast in our commitment to respecting human rights throughout our operations and supply chain. We take a zero-tolerance approach to any form of modern slavery, including servitude, human trafficking and forced labour. We foster an ethical and transparent business approach, implementing effective systems and controls, striving for the best outcomes with safety, passion and purpose, embracing a culture of no harm.

Throughout the reporting period, our focus was on:

- + Continuing engagement and training on modern slavery company-wide, including updating our onboarding process to include induction training on Modern Slavery Policy and Procedure;
- + Reviewing and updating our Ethical Behaviour Policy and Procedure; and
- + Engaging in conversations with regional communities in which we operate to assist with raising awareness of modern slavery risks in those communities.

While there is always more work to be done, we remain committed to making meaningful progress towards an ethical and resilient supply chain.

**Mark Ryan**  
Managing Director & CEO





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## Our structure

THE TASSAL GROUP IS COMPRISED OF PRIVATE COMPANIES ULTIMATELY CONTROLLED BY COOKE INC, A COMPANY INCORPORATED IN CANADA. THE TASSAL GROUP INCLUDES:

- + AQUACULTURE AUSTRALIA HOLDCO PTY LTD
- + AQUACULTURE AUSTRALIA MIDCO 2 PTY LTD
- + AQUACULTURE AUSTRALIA MIDCO 1 PTY LTD
- + AQUACULTURE AUSTRALIA COMPANY PTY LTD
- + TASSAL GROUP LIMITED
- + AQUATAS PTY LTD
- + TASSAL OPERATIONS PTY LTD
- + DE COSTI SEAFOODS PTY LTD
- + MPA FISH FARMS PTY LTD

### REPORTING ENTITIES COVERED BY THIS STATEMENT

This joint modern slavery statement is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) by Aquaculture Australia Holdco Pty Ltd (ACN 660 056 440) on its own behalf and its reporting entity subsidiaries (The Tassal Group) for the period 1 January 2024 - 31 December 2024. This statement was approved by the boards of each of the reporting entities covered by this statement on 18 June 2025.

### GOVERNANCE

Robust governance processes are crucial for developing an effective response to modern slavery. We work to ensure our modern slavery strategy and response are seamlessly integrated into our overall governance framework.



### TASSAL GROUP BOARD

01

Responsible for overseeing the delivery of Tassal's Responsible Business Strategy including our commitment to human rights and annual Modern Slavery Statement.

### CEO AND EXECUTIVE LEADERSHIP TEAM

02

Response for overseeing the execution of Tassal Group's policies and strategies. This includes the procurement of goods and services within their respective functions, in accordance with Tassal's Supplier Code of Conduct and Ethical Standards.

### MODERN SLAVERY WORKING GROUP

03

A cross-functional management group sponsored by the Chief People & Community Officer, composed of team members from key functions across the business. The Modern Slavery Working Group guides our approach to and management of human rights issues, including modern slavery. Working group members include representation from our ESG, Legal, People & Culture, Assurance, Finance, Supply Chain & Procurement teams.



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## Our shared values

**OUR SHARED VALUES ARE INTEGRAL TO OUR BUSINESS CULTURE; THEY DEFINE WHO WE ARE.**

These values underpin and guide our commitment, attitude, work ethic, and the quality of our product.



### PASSIONATE

We are committed in heart and mind to the work we do; we care, and our energy is infectious.



### WE OWN IT

We take responsibility for our decisions, performance and safety. We care and never want to let our team down.



### ACHIEVE TOGETHER

We believe together we can achieve more; we motivate, care for and support each other to be the best in our field.



### CAN DO SAFELY

We care and are courageous and loyal in our commitment to achieve.

## Our guiding principles

Our five P's are our guiding principles and form the foundation of our strategy and behaviours.

**PRINCIPLES OF GOVERNANCE**  
A framework for transparency, strategy and stewardship to ensure we are one of the world's most sustainable protein producers.

**PRODUCT**  
Responsibly grown, healthy and accessible protein to feed our global communities.

### PROSPERITY

Responsible and inclusive financial returns to ensure our stakeholders, employees, partners and customers continue to thrive.

### PEOPLE

An amazing tribe of dedicated people who take pride in making a difference while embracing our Zero by Choice safety culture.



### PLANET

Our home, that we value and share. Respected and cared for today and tomorrow for future generations.



**OUR GUIDING PRINCIPLES**

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## Our operations

### OUR FOOTPRINT: SEAFOOD, PRAWNS & BARRAMUNDI

- A.** Broome WA - Barramundi nursery
- B.** Cone Bay WA - Barramundi farm
- C.** Northern Prawn Fishery - Xanadu
- D.** Mission Beach QLD - Prawn farm, hatchery & processing facility
- E.** Proserpine QLD - Prawn farm, hatchery & processing facility
- F.** Yamba NSW - Prawn farm
- G.** Sydney NSW - Corporate office
- H.** Lidcombe - Seafood processing facility
- I.** Hawthorn VIC - Sales, marketing & innovation
- J.** Hobart TAS - Head office & feed centre

### OUR FOOTPRINT: SALMON

#### MARINE FARMING ZONES

- 1.** Eastern Zone - Okehampton Bay & Port Arthur
- 2.** Channel Zone - D'Entrecasteaux Channel
- 3.** Southern Zone - Dover & Huon River
- 4.** Western Zone - Macquarie Harbour
- 5.** Storm Bay Zone - Nubeena & West of Wedge

#### FRESHWATER HATCHERIES

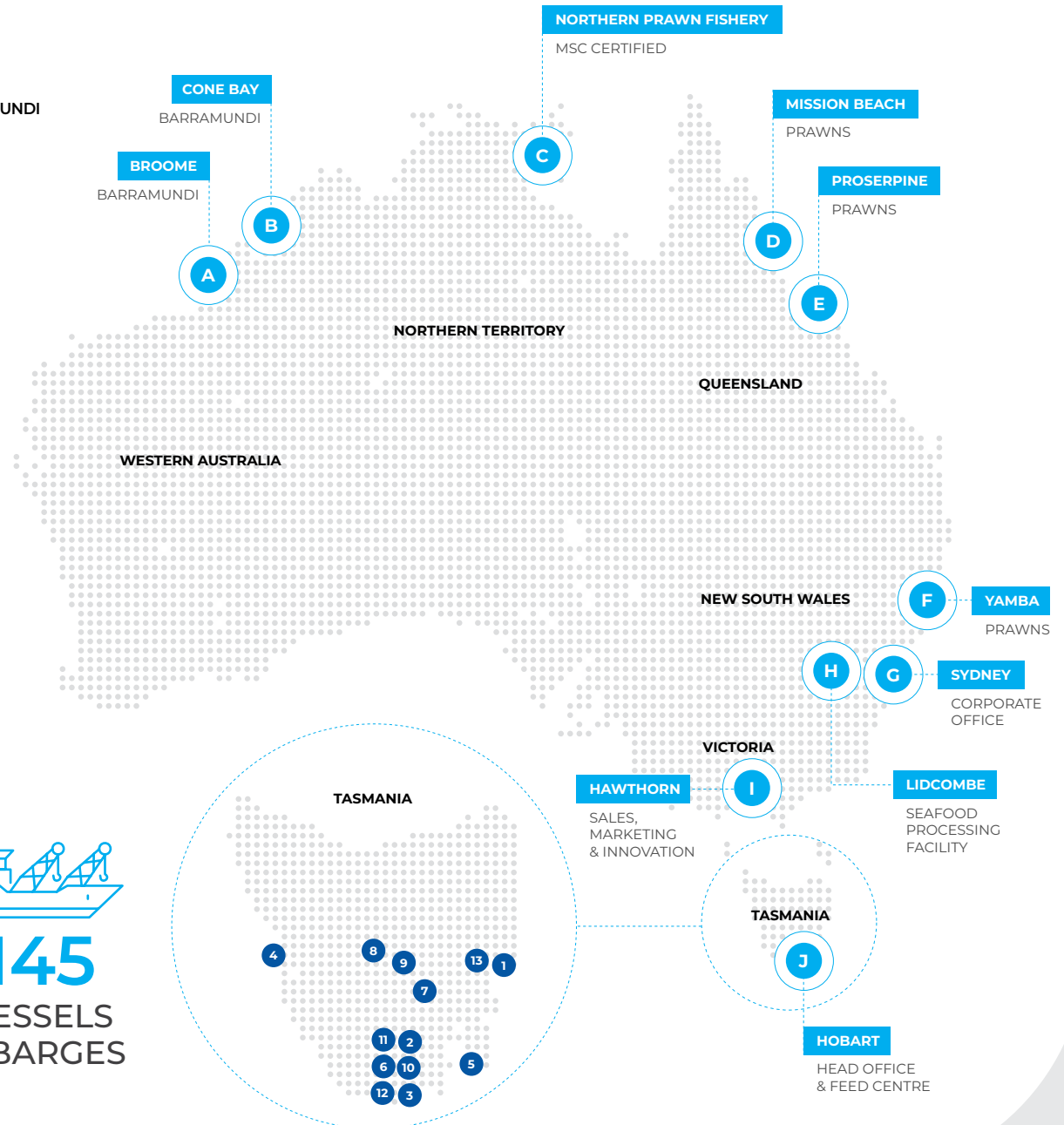
- 6.** Rookwood - Ranelagh
- 7.** Russell Falls & Karanja - Mount Field
- 8.** SALTAS (industry hatchery) - Wayatinah
- 9.** HRAS (future development) - Hamilton

#### PROCESSING FACILITIES

- 10.** Huonville - Salmon processing
- 11.** Margate - Salmon processing
- 12.** Dover - Salmon processing
- 13.** Triabunna - Rendering facility



**145**  
VESSELS  
& BARGES





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## Our alignment

**OUR RESPONSIBLE BUSINESS ROADMAP ALIGNS WITH THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (SDGs), PROVIDING A CONTEMPORARY AND DYNAMIC FRAMEWORK TO DELIVER MEANINGFUL IMPACT ACROSS OUR OPERATIONS.**

This includes our commitment to continually enhance supply chain sustainability, traceability, and transparency. Established by the United Nations in 2015, the SDGs define global sustainable development priorities and aim to mobilise efforts worldwide around a common set of goals and targets.

As a member of the United Nations Global Compact Network Australia (UNGCNA), we have pledged our commitment to its Ten Principles on human rights, labour, environment, and anti-corruption. The UN Guiding Principles (UNGP) are the recognised global standard for preventing and addressing business-related human rights harm. These principles outline the responsibilities of businesses in upholding human rights and provide a framework for action:

- + Businesses should support and respect the protection of internationally proclaimed human rights;

- + Businesses should ensure they are not complicit in human rights abuses;
- + Businesses should uphold the elimination of all forms of forced and compulsory labour; and
- + Businesses should uphold the effective abolition of child labour.

We understand that addressing adverse human rights impacts requires the implementation of adequate measures for their prevention, mitigation, and, where appropriate, remediation. We fully support the UNGPs and expect our supply chain network and employees to respect all human rights.



**Global Compact**  
Network Australia



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**WE RECOGNISE THAT OUR OPERATIONS AND SUPPLY CHAIN HAVE THE POTENTIAL TO CAUSE, CONTRIBUTE TO, OR BE DIRECTLY LINKED TO ADVERSE MODERN SLAVERY RISKS AND IMPACTS.**

The risk of modern slavery within our own operations is considered low due to most employees being directly employed by Tassal, supplier spend being primarily based in Australia and close relationships with supply chain partners. Despite this, we remain vigilant.

**We reduce modern slavery risks in our operations by:**

- + Ensuring employment practices are fully compliant with local labour laws in Australia;
- + Maintaining strong oversight of our recruitment processes; and
- + The inclusion of labour hire compliance in the scope of third-party audits.

**We reduce modern slavery risks in our supply chain by:**

Using a risk-based approach to supplier management, continuously improving our understanding through engagement and education. Key risk factors we consider for each supplier include:

- + Spend;
- + Volume of supply;
- + Geographic origin; and
- + Inherent risk of the product being supplied.
- + Conducting supplier risk assessments focused on modern slavery;
- + Including modern slavery clauses in contracts for new suppliers to the business;
- + Enforcing our Modern Slavery Procedure and ensuring the Supplier Code of Conduct and Ethical Standards are current; and
- + Sourcing seafood and related inputs only from suppliers with third-party certifications, where applicable.





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## Our people

**WE ARE AN AUSTRALIAN EMPLOYER WITH A NATIONAL FOOTPRINT THAT SPANS DIVERSE AND OFTEN REMOTE LOCATIONS—FROM DOVER IN SOUTHERN TASMANIA TO MISSION BEACH IN TROPICAL NORTH QUEENSLAND, AND ACROSS TO THE KIMBERLEY COAST IN WESTERN AUSTRALIA. OUR PEOPLE ARE CENTRAL TO OUR SUCCESS, AND WE RECOGNISE THE IMPORTANCE OF CREATING A SAFE, INCLUSIVE, AND ENGAGING WORKPLACE FOR EVERY INDIVIDUAL, REGARDLESS OF LOCATION OR ROLE.**

Our goal is to provide a high-quality employment experience by building an agile, values-driven workforce that embraces innovation and fosters a strong sense of belonging. To achieve this, we have a suite of policies, platforms, and governance frameworks designed to promote best practice in employment and industrial relations. These systems help us manage risk, ensure compliance, and maintain consistency across our geographically dispersed operations.

Our employment terms and conditions are aligned with the *Fair Work Act 2009*, the *National Employment Standards (NES)*, the *Paid Parental Leave Act 2010*, and other applicable legislation.

We operate under a combination of modern awards, union-negotiated Enterprise Bargaining Agreements (EBAs), and individual common law contracts. These arrangements reflect our commitment to lawful, ethical employment practices and play an important role in protecting against risks associated with underpayment, exploitation, or other forms of modern slavery.

### WHISTLEBLOWER POLICY

Our Whistleblower Policy provides an effective reporting and investigation framework, including an external whistleblower service provided by Deloitte. It supports and promotes a culture of compliance, honesty and ethical behaviour. The policy encourages employees to report suspected illegal, unethical or improper conduct, in circumstances where they may be apprehensive by offering a confidential and anonymous reporting mechanism.



PEAK WORKFORCE OF  
**1,835**  
EMPLOYEES  
ACROSS  
AUSTRALIA




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## Labour hire

**LABOUR HIRE WORKERS PLAY AN ESSENTIAL ROLE IN SUPPORTING OUR WORKFORCE, PARTICULARLY OUR SEAFOOD PROCESSING OPERATIONS DURING PEAK PRODUCTION PERIODS. THESE TEAM MEMBERS CONTRIBUTE TO THE DAY-TO-DAY EFFICIENCY OF OUR BUSINESS, ENSURING THE DELIVERY OF HIGH-QUALITY, RESPONSIBLY PRODUCED PRODUCTS TO OUR CUSTOMERS.**

A portion of this workforce is engaged through licensed labour hire providers, including participants in the Pacific Australia Labour Mobility (PALM) scheme. This scheme offers structured employment opportunities for workers from Pacific Island countries such as Fiji, Papua New Guinea, Samoa, Solomon Islands, Tonga, and Vanuatu. These partnerships support regional labour shortages and create valuable opportunities for Australia's neighbouring countries to build skills, earn an income and support their communities.

We recognise that labour hire workers, particularly those engaged through temporary visa arrangements, are more vulnerable to exploitation and modern slavery risks. Factors such as unfamiliar employment arrangements, limited job mobility, language barriers, or reliance on employer-provided accommodation and transport can

increase the likelihood of harm if not carefully managed. While Australia's labour hire licensing schemes and the PALM scheme include built-in protections, we acknowledge that consistent oversight is critical to ensure these protections are upheld in practice.

We are committed to maintaining safe, fair and transparent working conditions for all workers on our sites, including those employed through third-party labour hire providers. All labour hire agencies we engage are required to be appropriately licensed and adhere to our Supplier Code of Conduct and Ethical Standards. Additionally, we have incorporated specific obligations into labour hire contracts, requiring organisations to make all necessary efforts to mitigate modern slavery risks and to notify us of any potential issues. Assessment of labour hire arrangements are deeply ingrained into the scope of our third-party ethical audits and social assessments. We continue to engage directly with our labour hire partners to ensure their practices align with our expectations on worker welfare, grievance mechanisms, and responsible accommodation. Through this ongoing engagement, we aim to mitigate risk and uphold the wellbeing of every person contributing to our business.





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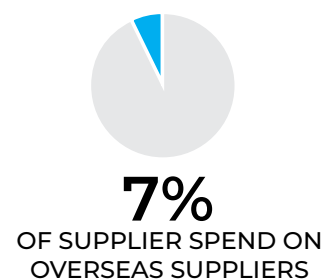
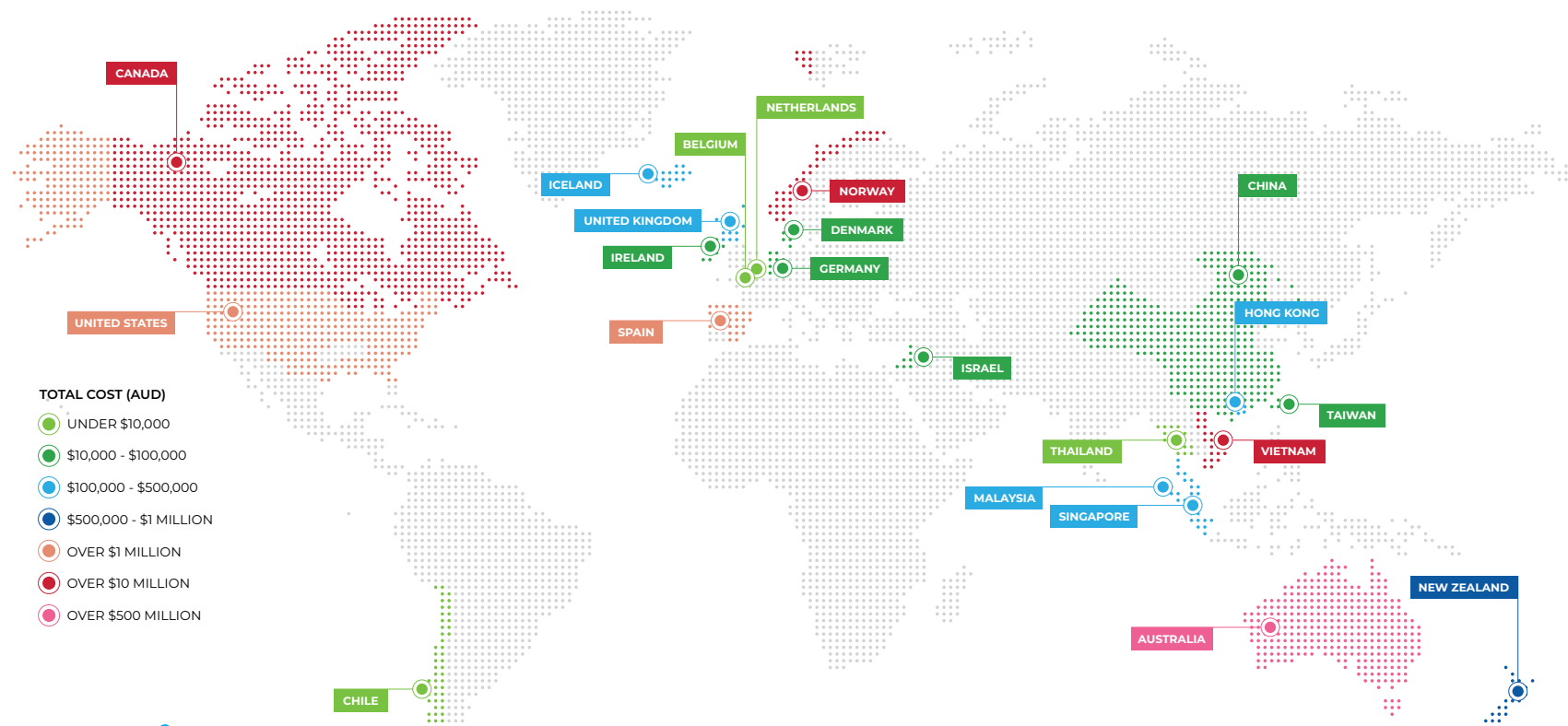
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## Our supply chain

FOR OVER 35 YEARS, WE HAVE CULTIVATED A DIVERSE NETWORK OF SUPPLY CHAINS ACROSS VARIOUS GEOGRAPHIC LOCATIONS. OUR KEY SUPPLIER GROUPS INCLUDE SEAFOOD, AQUACULTURE FEED, CAPEX EQUIPMENT, INGREDIENTS, PACKAGING, LOGISTICS, WAREHOUSING, AND THIRD-PARTY PROCESSING.





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## Our supply chain

### CONTINUING TO FOCUS ON LOCAL SUPPLIERS

Utilising suppliers and service providers as local to our operations as possible has delivered notable benefits, including cost efficiency, risk mitigation, lower-carbon footprint and a timely delivery of goods and services. Strong relationships with these local suppliers deliver significant flow on investment and opportunities to the communities surrounding our operations. These mutually beneficial relationships are integral for us, our local suppliers and the broader community. Regardless of their location, all our suppliers are expected to adhere to our Supplier Code of Conduct.

### SUPPLIER MANAGEMENT

We hold our suppliers to the highest standards of integrity, expecting their conduct to align with legal, ethical, safe, fair and responsible business practices. Our Supplier Code of Conduct and Ethical Standards delineate the principles that our suppliers and their sub-tier suppliers must adhere to when engaging in business with Tassal including:

- + Ensuring animal welfare;
- + Protecting the environment;
- + Respecting human rights;

- + Prohibiting modern slavery practices;
- + Prohibiting the use of child labour;
- + Ensuring reasonable working hours and fair wages;
- + Upholding the right to freedom of association and collective bargaining for workers;
- + Providing safe and healthy working conditions;
- + Conducting business lawfully, with respect, transparency and integrity; and
- + Establishing grievance and remedy procedures.

### QUALITY APPROVED SUPPLIER PROGRAM

Our Quality Approved Supplier Program is a critical control in our approach to managing modern slavery risks in the supply chain. As part of our broader Quality Management System (QMS), the program is designed to ensure that suppliers meet defined standards for ethical conduct, including the prevention of forced labour, child labour, and exploitative practices.

All suppliers whose goods or services have the potential to impact human rights are required to participate in this program. As part of the onboarding process, new suppliers complete

a standardised assessment that includes questions on labour rights and working conditions, alignment with international human rights frameworks, and certification status.

Following assessment, suppliers may be approved, approved with conditions, asked for further information, or not approved. Their approval status is reviewed regularly, with full re-evaluation taking place at least every three years.

Ongoing compliance is monitored through a combination of audits and risk-based reviews, which consider factors such as volume of supply and geographic origin. Where modern slavery risks or non-conformances are identified, we work with the supplier to implement corrective actions. If remediation is not possible or risks remain unresolved, the relationship may be discontinued.

This program supports our commitment to ethical sourcing by improving transparency, identifying and mitigating labour risks, and driving continuous improvement across our supply chain.



# 123

SUPPLIERS APPROVED THROUGH QUALITY APPROVED SUPPLIER PROGRAM



# \$554

MILLION AUD INVESTED IN AUSTRALIAN SUPPLIERS IN 2024





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## Certifications

**WE ARE COMMITTED TO ONGOING ENHANCEMENTS ACROSS OUR OPERATIONS BY PRIORITISING TRANSPARENCY AND ADOPTING THIRD-PARTY CERTIFICATIONS TO VALIDATE OUR EFFORTS.**

### ETHICAL AUDITS

At Tassal, we are committed to transparency, accountability, and continuous improvement, which is why we participate in regular ethical audits. These audits are conducted by independent third parties using the Sedex Members Ethical Trade Audit (SMETA) methodology. They assess our operations against international standards relating to labour rights, health and safety, environment, and business integrity. This process provides valuable external validation of our practices and helps us identify opportunities to strengthen our approach to ethical sourcing and worker welfare.

We utilise the Sedex platform to facilitate the audit process, manage related data, and maintain visibility over our performance across multiple operational sites. These audits form an important part of our broader human rights due diligence framework and support our goal of maintaining high standards in our own operations and across our supply chain.

### SUSTAINABILITY CERTIFICATIONS

Tassal is committed to maintaining high standards of environmental and social performance across our operations. We demonstrate this commitment through the implementation of third-party sustainability certifications, which provide credible, independent verification of our practices. Certifications are adopted at our sites based on alignment with our values, operational focus, and stakeholder expectations.

These programs support our efforts to operate transparently and responsibly while fostering continual improvement in key performance areas. Many of the certifications we maintain include specific criteria related to labour rights, ethical sourcing, and the prevention of modern slavery. As part of our certification processes, we are regularly assessed against international standards that address forced labour, worker welfare, and human rights protections, helping to strengthen our due diligence efforts across the supply chain.

Third-party certification frameworks provide robust structures for assessing and addressing key risks, including those related to modern slavery. Standards such as the Aquaculture Stewardship Council (ASC) and GLOBALG.A.P. standards include specific social criteria aligned with the International

Labour Organization's core labour principles. Certification audits assess compliance with these criteria on-site, helping to identify potential gaps and providing assurance that workers' rights are being respected throughout our operations.

These certifications form an important part of our broader human rights due diligence framework. They reinforce our commitment to responsible sourcing and ethical labour practices, providing practical mechanisms to help prevent exploitation in aquaculture and seafood supply chains. Certification standards typically require:

- + Transparent recruitment practices that prohibit worker-paid fees;
- + Access to effective grievance mechanisms for all workers;
- + Safe and equitable working environments where employees earn a decent wage and have regulated working hours.
- + Safe and decent accommodation when provided by the employer; and
- + Oversight of labour hire arrangements to ensure compliance with ethical labour standards.



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## Supply chain traceability

**RESPONSIBLE SOURCING BEGINS WITH OUR FIRST INTERACTION WITH NEW SUPPLIERS THROUGH AN APPROVED SUPPLIER QUESTIONNAIRE. THIS INITIAL STEP GATHERS NOT ONLY ESSENTIAL BUSINESS INFORMATION BUT ALSO DETAILED INSIGHTS INTO EACH SUPPLIER'S ETHICAL SOURCING PRACTICES, INCLUDING THEIR APPROACH TO ENVIRONMENTAL STEWARDSHIP, HEALTH AND SAFETY, HUMAN RIGHTS, AND SUSTAINABILITY.**

Suppliers are asked whether they hold relevant accreditations, have human rights policies in place and if they prepare a modern slavery statement. All collected data is captured and managed within Donesafe, our bespoke compliance and risk management platform. Donesafe enables centralised tracking and analysis of supplier information, supporting our commitment to transparency and continuous improvement across our supply chain.

### RESPONSIBLE SOURCING OF AQUACULTURE FEED

We work closely with our aquaculture feed suppliers, who represent a critical part of our upstream supply chain, to support responsible sourcing and improve traceability of key raw materials.

As primary supply partners, feed suppliers play an essential role in setting expectations that influence working conditions not only at the point of feed production, but also among those involved in the cultivation, harvest, or capture of raw materials.

Our primary feed supplier sources approximately 35% of raw materials from outside of Australia, making transparency across global supply chains essential to upholding human rights and fair labour practices.

Our third-party certifications require us to demonstrate traceability for all feed ingredients making up more than 2% of total inclusion—not only to confirm species, origin, and harvest method, but to strengthen due diligence on labour conditions across all tiers of the supply chain.

This includes key raw materials such as marine ingredients and soy, which can be traced back to where the fish was landed or processed, or where the crop was grown. Traceability at this level supports the identification and prevention of forced labour, unsafe working conditions, and other forms of exploitation

### DEFORESTATION FREE SOY

Soy Protein Concentrate represents a relatively small percentage of our total feed ingredient inclusion. 100% of the Soy Protein Concentrate used in our feed has been ProTerra certified since 2016. ProTerra certification is an additional safeguard to the social responsibility, prevention of modern slavery, and environmental sustainability of our supply chain. The requirement in the ProTerra standard is that soy cannot come from agricultural land that has been cleared for cultivation after 2009, helping to prevent deforestation, which is often linked to exploitative labour practices.

Soybean Meal is also included in our prawn feeds and is certified by the US Soy Sustainability Assurance Protocol, which is an industry-wide initiative that demonstrates commitment to responsible growing practices and sustainability through setting clear, verifiable standards of industry practice, including prohibiting illegal deforestation and ensuring fair labour practices.



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## Our journey

### 2020

- + Established a Modern Slavery Working Group
  - + Mapped our supply chain
- + Developed modern slavery clauses for inclusion in major equipment supply agreements
  - + Extended our approved supplier program
    - + Maintained third-party sustainability certifications across our operations
    - + Reviewed our supplier guidelines to set our framework for supplier code of conduct and ethical standards



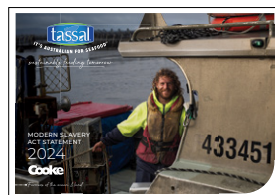
### 2022

- + Developed our online employee modern slavery training package
- + All major suppliers formally acknowledged our Modern Slavery Policy and our Supplier Code of Conduct and Ethical Standards
  - + Upgraded our SEDEX membership to allow risk assessment of our own suppliers



### 2024

- + Modern slavery training expanded to include all employees with purchasing delegations and those holding company credit cards
  - + Discussed modern slavery risks and awareness with our Community Advisory Groups
- + Developed modern slavery awareness resources for our operational sites
- + Developed our Modern Slavery Procedure



### 2021

- + Joined the United National Global Compact Network Australia
- + Assessed 100% of our Category A suppliers
- + Launched our Responsible Business Roadmap with modern slavery and responsible sourcing targets
- + Modern slavery clauses included in all major contract agreements
- + Developed our Modern Slavery Policy



### 2023

- + Reviewed and updated our credit card and expense claim policy
- + Reviewed and updated our labour hire contracts
- + Modern slavery training rolled out to key employees
- + Included a weighted sustainability assessment, including modern slavery, in major tenders



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**WE RECOGNISE THAT ADDRESSING MODERN SLAVERY REQUIRES A STRUCTURED, PROACTIVE, AND EVOLVING APPROACH. TO SUPPORT THIS, WE HAVE ESTABLISHED A ROBUST FRAMEWORK OF POLICIES, PROCEDURES, AND TAKEN ACTIONS THAT GUIDE OUR PEOPLE AND PARTNERS IN IDENTIFYING, PREVENTING, AND RESPONDING TO MODERN SLAVERY RISKS.**

#### **POLICIES & PROCEDURES**

We expect our people and all our suppliers to act with integrity and align their conduct with legal, ethical, safe, fair, and responsible business practices.

We have a comprehensive set of policies and procedures that define our values, ways of working, and expectations for both employees and suppliers. These are accessible through our document management system, ensuring all employees are informed of relevant amendments and updates.

The following policies are those that are most relevant to preventing modern slavery among our team and our supply chain.

## Our actions

| POLICY                                                | PURPOSE                                                                                                                                                                                |
|-------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Modern Slavery Policy</b>                          | Outlines our commitment to actively work to identify and eliminate modern slavery practices in our operations, business partnerships and supply chain.                                 |
| <b>Modern Slavery Procedure</b>                       | Defines the approach, processes and procedures established to meet our Modern Slavery Policy commitments.                                                                              |
| <b>Supplier Code of Conduct and Ethical Standards</b> | Sets out the principles our suppliers and their sub-tier suppliers are to adhere to when conducting business with Tassal.                                                              |
| <b>Code of Conduct</b>                                | Sets out the expectations for personal and professional behaviour of Tassal employees whilst at work or in any situation where they represent Tassal.                                  |
| <b>Ethical Behaviour Policy</b>                       | Details our expectations of the ethical standards of all employees and our obligations as a company to conduct business in an ethical manner.                                          |
| <b>Ethical Behaviour Procedure</b>                    | Outlines the procedures to be followed to achieve the ethical standards required in our Code of Conduct, Ethical Behaviour Policy and to meet our customer and community expectations. |
| <b>Risk Management Policy</b>                         | Provides the structure to support the process of identifying, assessing, managing, monitoring and reporting risk.                                                                      |
| <b>Whistleblower Policy</b>                           | Provides a reporting and investigation framework, including an external whistle blower service.                                                                                        |
| <b>Responsible Business Roadmap</b>                   | Represents our commitment to being a responsible global citizen and creating a pathway toward zero tolerance to any form of modern slavery.                                            |





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## Our actions

**THROUGHOUT 2024, WE SIGNIFICANTLY INCREASED OUR EFFORTS TO RAISE AWARENESS OF MODERN SLAVERY AMONG OUR EMPLOYEES AND THE COMMUNITIES IN WHICH WE OPERATE.**

### INTERNAL TRAINING

We targeted all employees with purchasing delegations and those holding company credit cards to ensure they understand the potential for and impacts of modern slavery. Our updated online training module, mandatory for all employees involved in purchasing goods for the business, was successfully completed by 91 employees in 2024.

### INTERNAL AWARENESS CAMPAIGN

To broaden awareness across the business, we launched a series of informative posters. These posters provided detailed information about modern slavery, emphasising its presence in Australia and highlighting key indicators to look for. The goal was to raise awareness from both a company and personal perspective, extending this knowledge to our employees' friends and families who might encounter modern slavery in their workplaces.

### COMMUNITY AWARENESS

Community Advisory Groups (CAGs) serve as a vital platform for regular dialogue and feedback, ensuring that community voices are actively heard and integrated into our decision-making processes. These groups engage in discussions about our operations, gather valuable input, and address any issues or questions from the community.

Recognising the importance of modern slavery awareness, we broadened our awareness initiatives to extend into the communities where we operate. Modern slavery awareness was a key agenda item in our second bi-annual CAG meetings for 2024. During these meetings, we provided members

with a comprehensive overview of modern slavery, including how to identify it and the steps to report it. We emphasised that modern slavery is a global issue that also affects Australia and highlighted the various forms it can take. This initiative underscores our commitment to educating and empowering our people and our community to recognise and combat modern slavery.

**Is Your Workmate or Friend a Slave?**  
**RECOGNISE THE SIGNS**

|                                                                                                         |                                                                                                                                                      |                                                                                                       |                                                                                                                                                                            |
|---------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| THEY ARE CONTROLLED OR HAVE RESTRICTED FREEDOM OF MOVEMENT (E.G. BEING MONITORED, GUARDED, OR CONFINED) |                                                                                                                                                      | THEY HAVE NO ACCESS TO THEIR PERSONAL IDENTIFICATION DOCUMENTS SUCH AS A PASSPORT OR TRAVEL DOCUMENTS |                                                                                                                                                                            |
|                                                                                                         | THEY WORK LONG HOURS FOR LITTLE OR NO PAY AND HAVE NO ENTITLEMENTS OR THINK THEY OWE MONEY TO THEIR EMPLOYER AND WORK FOR FREE TO PAY OFF THEIR DEBT |                                                                                                       | THEY APPEAR FRIGHTENED OR WITHDRAWN, OR SHOW SIGNS OF PHYSICAL OR PSYCHOLOGICAL ABUSE OR MAY BE RELUCTANT TO TALK TO OFFICIALS INCLUDING POLICE OFFICERS OR HEALTH WORKERS |

**SEE SOMETHING SAY SOMETHING**  
TO REPORT MODERN SLAVERY IN AUSTRALIA CALL THE AUSTRALIAN FEDERAL POLICE ON 131 237 OR REPORT THROUGH THEIR WEBSITE [WWW.AFP.GOV.AU](http://WWW.AFP.GOV.AU)  
FOR MORE INFORMATION SCAN THE QR CODE





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**WE CONTINUOUSLY ENHANCE OUR EFFORTS TO UNDERSTAND OUR RISK PROFILE AND PERFORMANCE IN MANAGING MODERN SLAVERY RISKS. OUR ROBUST CORPORATE GOVERNANCE FRAMEWORK, GROUNDED IN TRANSPARENCY, ACCOUNTABILITY, AND STEWARDSHIP, ENABLES US TO BETTER IDENTIFY AND ADDRESS THESE RISKS.**

We measure the effectiveness of our modern slavery actions through:

- + Conducting monthly Modern Slavery Working Group (MSWG) meetings;
- + Monitoring any modern slavery breaches or risks of breaches through the MSWG;
- + Monitoring the number of employees that complete our internal training program;
- + Monitoring acknowledgment of our Supplier Code of Conduct and Ethical Standards; and
- + Conducting modern slavery risk assessments.

## Assessing the effectiveness of our actions





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## Future priorities

### PRIORITIES IDENTIFIED FOR 2025 INCLUDE:

#### 1. Develop a third-party assessment framework

We commit to designing and implementing a structured procedure for assessing third-party suppliers and partners, focusing on identifying and mitigating modern slavery risks across our supply chain.

#### 2. Establish a modern slavery action tracking system

We commit to implementing a system to document and monitor actions taken in response to identified modern slavery risks and impacts. This will support continuous improvement and enable us to measure the effectiveness of our interventions.

#### 3. Integrate modern slavery awareness into employee engagement

We commit to including targeted questions on modern slavery awareness and reporting confidence in our annual employee engagement survey, helping us gauge internal understanding and identify areas for further education.

#### 4. Enhance internal communication and awareness

We commit to regularly feature modern slavery-related content in our internal newsletters to raise awareness, share updates on our progress, and promote a culture of ethical responsibility.

#### 5. Conduct in-depth risk reviews of high-risk suppliers

We commit to undertaking detailed internal reviews of at least two suppliers identified as high-risk, focusing on specific products or services. These reviews will assess potential modern slavery indicators and inform our broader risk mitigation strategy.

#### 6. Participate in the UN Global Compact Network Australia (UNGCA) Modern Slavery Community of Practice (MSCoP)

As business members of the UNGCA, we commit to participating in bi-annual MSCoP sessions to discuss leading practice relating to identifying and assessing, integrating and acting, and communicating performance on human rights issues.



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## Regulatory disclosure matrix

The table below references where mandatory criteria are disclosed for the Australian *Modern Slavery Act 2018* (Cth).

| Criterion | Mandatory criteria                                                                                                                                                       | Disclosure reference         |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| 1         | Identify the reporting entity                                                                                                                                            | 4                            |
| 2         | Describe the reporting entity's structure, operations and supply chains                                                                                                  | 4, 6, & 11                   |
| 3         | Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls                          | 8                            |
| 4         | Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation process | 15, 16 & 17                  |
| 5         | Describe how the reporting entity assesses the effectiveness of these actions                                                                                            | 18                           |
| 6         | Describe the process of consultation with any entities that the reporting entity owns or controls                                                                        | 4                            |
| 7         | Any other relevant information                                                                                                                                           | 5, 7, 9, 10, 12, 13, 14 & 19 |



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Photographs by: Pete Harmsen, Samantha Saltmarsh,  
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**Cooke**