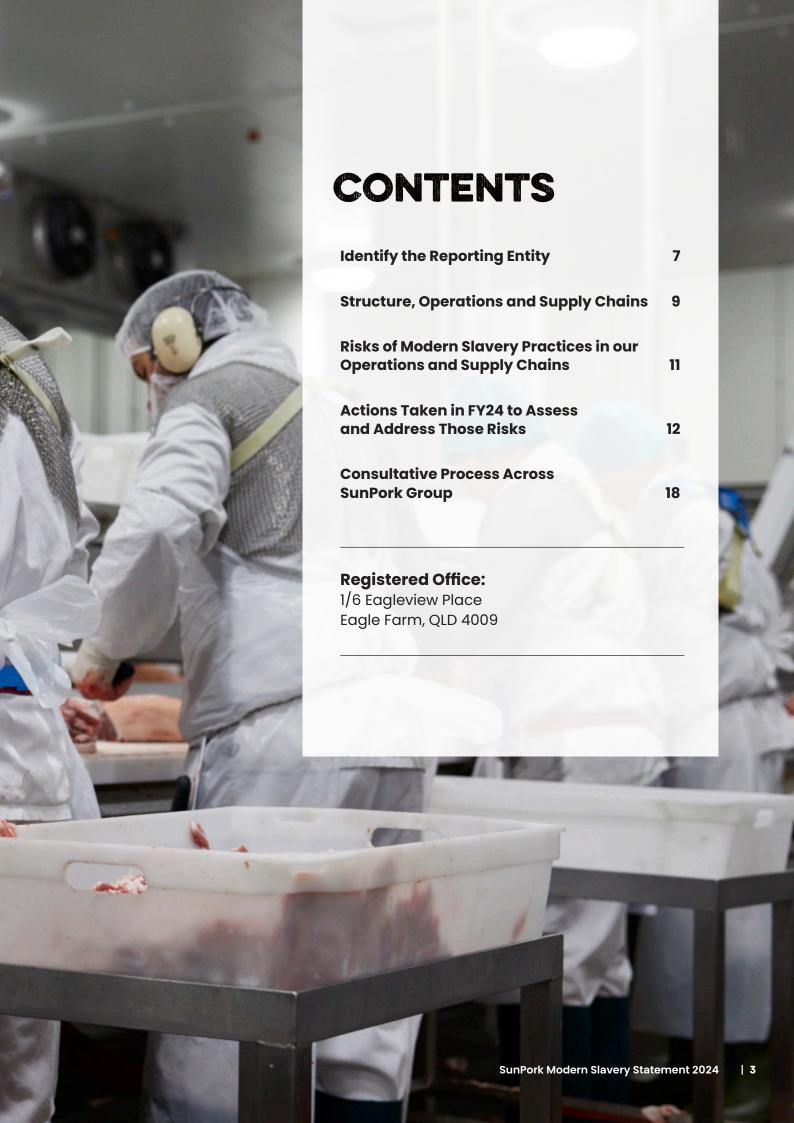


## MODERN SLAVERY STATEMENT 2024

A joint statement for SunPork Pty Ltd, SunPork Fresh Foods Pty Ltd and Swicker's Kingaroy Bacon Factory Pty Ltd.





**OUR JUST CAUSE: SUNPORK GIVES** MORE THAN WE TAKE.

AT SUNPORK WE HAVE A MISSION. WE GROW PASSION FOR PORK THROUGH OUR PEOPLE, OUR PROCESSES AND OUR PRODUCTS.

AT SUNPORK WE HAVE A VISION. MORE PEOPLE CONNECTED WITH SUNPORK AND OUR PRODUCTS.



## CEO STATEMENT

### I am pleased to present SunPork's fifth Modern Slavery Statement.

The SunPork team have a mission to grow passion for pork through our people, our processes and our products.

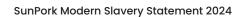
SunPork understands that we cannot grow as a business unless we take steps to ensure that the fundamental human rights of all people connected to our processes are respected.

A significant part of fulfilling our mission is to make certain that we are socially responsible, this involves doing all we can to reduce and eliminate any risks of modern slavery in both our internal and external supply chains.

Over the last few years SunPork has taken an introspective approach and initiated measures to ensure that all reasonable steps are taken to mitigate risks of modern slavery within our internal processes. Whilst we appreciate that ensuring the absence of modern slavery is an ongoing process involving frequent and constant review, we are now in a position where we are comfortable with the solid foundation we have built and SunPork can now begin to focus externally on our suppliers and external supply chains.

I encourage you to read through the report to understand the progress we have made towards eliminating modern slavery risk from our supply chains with a continued focus on **Prevention**, **Protection and Remedy**, which we, as a business, are committed to continuing to advance in the years to come.

**Dr Robert van Barneveld**Group CEO and Managing Director



## SUNPORK AT A GLANCE

The SunPork Group is wholly Australian owned by the Queensland based Cameron, Hall and McLean families.

We produce more than 20% of Australia's fresh pork.

We operate 48 Australian farms and 16 ancillery sites in 4 states and 8 New Zealand farms.



## We produce 1,100,000 pigs per year.

We have more then 52,000 sows. This means we have at least 550,000 pigs on our farms every day.



#### Staff 1,550+

We employ more than 1,350 staff in rural and regional communities plus another 200 in the city.



## Swickers processes 1.2 million pigs per year.

This equates to 95% of all Queensland pork production.



## IDENTIFY THE REPORTING ENTITY

This Modern Slavery Statement ('the statement') has been developed in accordance with the *Modern Slavery Act* 2018 (Cth) for the financial year ending 30 June 2024 (FY24).

With shared supply chains and management, this statement has been prepared by the SunPork Group and is a joint statement for three entities:

- 1. SunPork Pty Ltd (ACN 059 168 786) and its wholly owned and controlled subsidiaries.
- SunPork Fresh Foods Pty Ltd (ACN 135 230 545) and its wholly owned and controlled subsidiaries.
- 3. Swicker's Kingaroy Bacon Factory Pty Ltd (ACN 009 678 693) and its wholly owned and controlled subsidiaries.

This statement is intended to meet the requirements of section 16 of the Modern Slavery Act 2018 (Cth). It outlines the steps taken by the SunPork Group during FY24 to minimise the risk of modern slavery occurring within our business and within our external supply chains.

To find out more about the nature of our business, you can visit: <a href="mailto:sunporkgroup.com.au">sunporkgroup.com.au</a>

This statement was approved by the Board of the SunPork Group including reporting entities SunPork Pty Ltd, SunPork Fresh Foods Pty Ltd and Swicker's Kingaroy Bacon Factory Pty Ltd on the 13<sup>th</sup> November 2024.





## STRUCTURE, OPERATIONS AND SUPPLY CHAINS

The SunPork Group is Australia's largest pork producer and is 100% Australianowned.

We produce exceptional pork products with superior genetics and sustainable farming practices to deliver only the best quality pork for Australia.

We operate 48 Australian farms and 16 ancillary sites across four states in addition to 8 farms across two islands in New Zealand. We employ over 1550+ people, with most staff employed in rural and regional communities across Australia with 2% of our animal care staff proudly on the autism spectrum.

We process 39% of all pigs in Australia across two abattoirs and two value-add facilities. SunPork products are produced and processed in Australia with distribution to domestic and international markets. Annually, we supply more than 90 million kilograms of pork, including 52 value-add products, distributed to 1,800 supermarkets. The SunPork Group also exports 10 million kilograms of pork annually to at least seven different countries.

Through our own organisation and external supply chains, we source genetics, raw materials, components and services. Our supply chain comprises the procurement of pork production and processing inputs which are then transformed into SunPork's three main product categories – pork, genetics and processing by-products.

In FY24, the SunPork Group interacted with more than 2,500 external vendors across our supply chain under the following categories:

- · Labour and corporate services
- Animal feed and health nutrition products
- Packaging products
- Engineering, construction and fabrication services
- Maintenance spares and services
- Energy and Utilities
- Transport services
- Operations support services
- Marketing and cold-chain distribution services

Our procurement model is both centreled and decentralised. High volume, high spend category purchases are mostly centre-led, while site-specific purchases are decentralised where subject matter experts hold responsibility for departmental purchases.





# RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

We are committed to continuously improving our risk identification capability which is assessed by our Modern Slavery Working Group members in consultation with category specialists within the business and key contacts within our broader external supply chains.

In FY24 our working group expanded to include procurement experts across the business units so that we could ensure the full supply chain could be critically evaluated and assessed. SunPork recognizes that addressing risks in the supply chain requires a long-term commitment and it will continue to be an ongoing and evolving process in the years to come.

The Working Group were able to highlight the below potential risks when assessing modern slavery within our internal and external supply chains.

Potential Modern Slavery Risk or Potential indicators of Modern Slavery	Sectors or Industries at Higher Risk
Internal Supply Chain (Our Operations)  Exploitation of migrant workers  Deceptive recruitment  Underpayment of wages  Excessive working hours	Internal Supply Chain (Our Operations) Functions within SunPork at higher risk:  • Labour Hire - Farms and processing facilities
<ul> <li>External Supply Chain (Our Suppliers)</li> <li>Exploitation of migrant workers</li> <li>Deceptive recruitment</li> <li>Underpayment of wages</li> <li>Excessive working hours</li> </ul>	External Supply Chain (Our Suppliers)  Grain  Animal nutrition and health products  Value-add processing ingredients  Packaging  Construction  Electronics  Storage and distribution  Transport  Trade services  Labour Hire  Uniforms  Personal Protective Equipment (PPE)

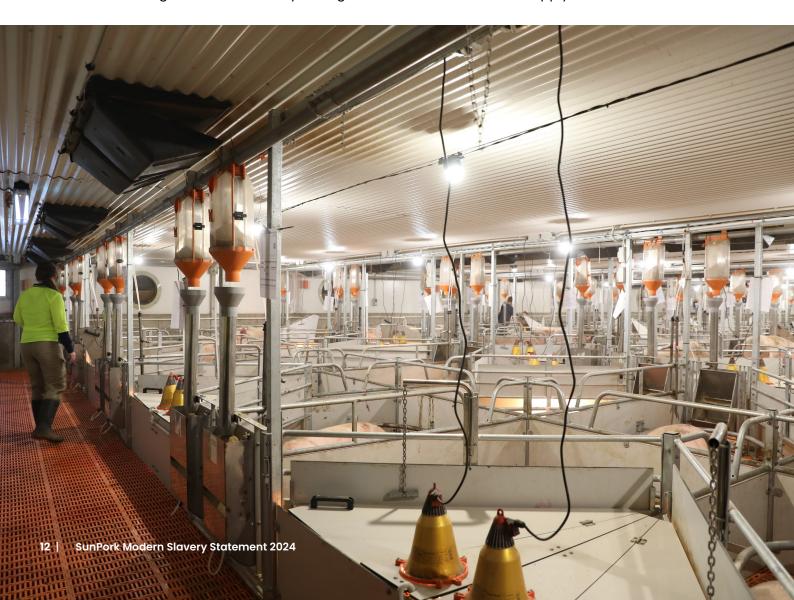


# ACTIONS TAKEN IN FY24 TO ASSESS AND ADDRESS THOSE RISKS

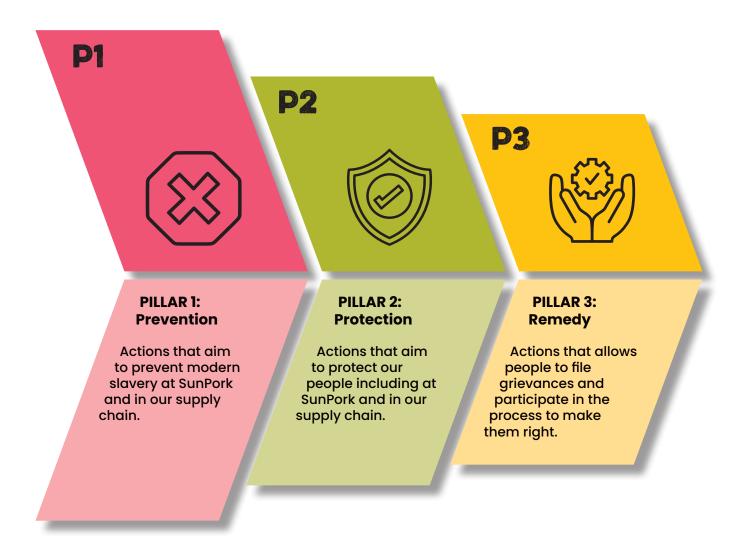
SunPork Group is a socially responsible business committed to complying with national labour standards and promoting safe and appropriate work conditions across our business and throughout our supply chains.

Whilst we are an Australian owned agriculture and fresh food entity, our supply chains operate on a global basis. As such we appreciate the magnitude of work involved regarding our focus in FY24 of assessing risks of modern slavery in our supply chains and acknowledge that addressing these risks requires a long term and collaborative strategy.

SunPork are committed to this cause and will continue to ensure that all reasonable actions are taken to mitigate modern slavery through our internal and external supply chains.



#### All actions taken in FY24 advance one of our primary pillars of Prevention, Protection or Remedy.



Over the past few years SunPork has focused on ensuring the absence of modern slavery within our internal processes by putting in place strategies to ensure the business, its employees and our broader community are protected from any ongoing risks associated with modern slavery.

In FY24 SunPork shifted our focus from advancing our primary pillars within our internal business to focusing on implementing prevention, protection and remedy processes within our external supply chain. This year the business decided to

focus on our PPE suppliers noting that it is a higher risk sector.

We acknowledge that the success of our modern slavery program will be dependent on how we measure the implementation of our planned program of work and our ability to refine our approach as and when required.

The actions taken in FY24 will continue to be reviewed and built upon in the years to come as SunPork continues to strive to mitigate any adverse impacts on human rights.

### ACTIONS

#### SUNPORK'S FY24 ACTIONS INCLUDED:

#### **ACTION 1:**

#### **Expansion of Working Group**

In FY23 SunPork resolved that the Working Group should expand to include a crosssection of employees from our varying business units to ensure that the full supply chain and employee experience was represented.

In FY24 procurement specialists from both our Farms and Processing business units joined our working group to impart their expertise and assist the group in creating our strategic plan to mitigate modern slavery throughout our supply chains.

#### **ACTION 2:**

#### Human Ethics - continued participation in human rights reporting and assessments

Through members of our internal supply chain, we reported under.

- (i) Sedex Members Ethical Trade Audit (SMETA)
- (ii) Intertek Social Accountability Audit

which requires us to demonstrate our commitment to respecting human rights in our operations and we have successfully demonstrated compliance in Australia.

#### **ACTION 3:**

#### **Corporate Policy Development**

Following the United Nations Guiding Principles on Business and Human Rights, SunPork continues to strengthen group-wide internal policies and procedures. In FY24 the SunPork Group reviewed and updated the SunPork Group Code of Conduct.

As part of this review the business reinforced and ensured that SunPork remains compliant with all modern slavery requirements across our operations and supply chains and established fundamental expectations around the conduct of all employees.

Other policies reviewed and updated in FY24 include our Diversity Policy, Leave Policy, and Paternal Leave Policy.

#### **ACTION 4:**

#### **Creation of Supplier Checklist for Site Visits**

As part of our focus on our external supply chains SunPork established a Modern Slavery Checklist for supplier site visits.

SunPork realises that site visits present us with a unique firsthand opportunity to witness the practices of our suppliers and presents us with the chance to ensure that our suppliers are also taking all reasonable steps to mitigate modern slavery throughout their internal and external supply chain.

The checklist will see SunPork staff members in collaboration with our suppliers examine the workplace for any indicators of Human Trafficking and Slavery, specifically staff will be looking to see if any indications as outlined by the Australian Federal Police are present.

Should any concerns be identified, these will be discussed and assessed with the supplier with the aim of mitigating any existing risk.

#### **ACTION 5:**

#### **Creation of Supplier Declaration**

In FY24 SunPork created a Modern Slavery Declaration which suppliers were required to complete in order to facilitate an ongoing business relationship.

Our declaration requires our suppliers to affirm that they are compliant with all applicable modern slavery laws, that they have no knowledge of any actual or alleged modern slavery within their businesses or their supply chains and that they will notify SunPork should they become aware of any breaches.

This declaration will assist SunPork in ensuring that the businesses we engage with are compliant with their modern slavery obligations which in turn will mitigate the risk of modern slavery being present in our external supply chains.

**ACTION 6:** 

#### **Review of Our PPE Providers**

In FY24 SunPork undertook a review of the practices of our PPE providers to establish if there were any significant risks of modern slavery present in these external supply chains.

SunPork utilised The Slavery & Trafficking Risk Template (STRT) which is an open-source survey published by the Social Responsibility Alliance (SRA) as a tool to facilitate this review, the utilisation of the STRT enabled us to learn more about our suppliers' operations and their strengths and weaknesses when addressing modern slavery risks.

Seven of our PPE providers responded to our survey, with each supplier confirming that there is no known modern slavery within their business or supply chains. We further confirm that after a detailed review of the responses, our Modern Slavery Working Group was comfortable that there were no responses that presented significant concerns that modern slavery may be present.

There were however a few suppliers who acknowledged that they do not have specific policies or procedures which prohibit modern slavery. SunPork appreciates that several of these suppliers are small businesses with limited resources. As a result of these responses SunPork has requested that each of these suppliers complete a Modern Slavery Declaration as outlined in action item 4.

Based on the success of the FY24 review of our PPE providers, we have committed to progressing action item 6 further with the aim of establishing periodic reviews as a

supplement to the audits already completed.

SunPork will also look to conduct audits on other suppliers that may be identified as operating in high-risk sectors regarding modern slavery.

SUNPORK GROUP IS A SOCIALLY RESPONSIBLE **BUSINESS** COMMITTED TO COMPLYING WITH NATIONAL LABOUR STANDARDS AND **PROMOTING DECENT WORK** CONDITIONS **ACROSS OUR BUSINESS AND** SUPPLY CHAIN.







# CONSULTATIVE PROCESS ACROSS SUNPORK GROUP

As previously outlined, SunPork are in the process of developing and implementing consultative mechanisms which encourages cooperation and engagement with all of our employees.

In FY24 we conducted our Employee Engagement Survey which continues to see a year-on-year increase in the numbers of staff participation. Sunpork continues to focus on ensuring that the outcomes of the survey result in our leadership and their teams building realistic action points in order to address any areas for growth or opportunities to increase staff engagement.

In addition to this, throughout FY24 SunPork continued to facilitate consultative meetings that incorporated both team members and leadership. The meetings focused on discussions around our people and processes, again with the intent to increase engagement.







Thank you for following our FY24 journey towards mitigating and eradicating modern slavery within the SunPork Group and our supply chains.

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sunporkgroup.com.au