

Modern Slavery Statement 2024/25

COMPETITIVE FOODS AUSTRALIA PTY LTD

Introduction

This Modern Slavery Statement (“Statement”) for Competitive Foods Australia Pty Ltd and its subsidiaries (“CFA” or the “Group”), is prepared in line with the requirement of the Modern Slavery Act 2018 (Cth) (“Modern Slavery Act”).

The purpose of this Statement is to outline our approach to ensuring that CFA has robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain as well as to address the risks identified in previous statements.

CFA is one of the most diverse private companies operating in Australia and New Zealand, including an iconic network of owned and franchised Quick Service Restaurants (“QSR”), world class multi location/multi product food manufacturing, high quality food sales and marketing, cold storage, protein procurement and a significant real estate portfolio.

This statement has been developed by a diverse CFA Modern Slavery Working Group in conjunction with the individual CEO’s/senior executives tasked with managing risks within their networks.

CFA recognises that slavery and human trafficking can occur in many forms, as considered in the Act. This can include human trafficking, forced labour, debt bondage, forced marriage, sexual exploitation, child exploitation, domestic servitude etc.

CFA is fully committed to operating responsibly and establishing and adhering to the highest ethical standards. CFA will not tolerate any forms of slavery or human trafficking in our business.

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1. Reporting Entities

This Statement covers the activities of CFA and its key operating entities and operations as follows:

Legal Entity	Principal place of business	Operations
Competitive Foods Australia Pty Ltd	Australia	Parent company of CFA Group, providing strategic, financial, legal, risk, taxation & governance support.
Hungry Jack's Hungry Jack's Australia Pty Ltd	Australia	Holds Master Franchise Agreement with Burger King, supports the operations of 80 QSR franchisee stores.
Hungry Jack's Pty Ltd	Australia	Operates 401 owned and/or operated QSR restaurants across Australia.
Comgroup Comgroup Supplies Pty Ltd	Australia	Meat processor - located in Brisbane.
Comgroup New Zealand Limited	New Zealand	Meat processor.
Markwell Foods Markwell Pacific Marketing Pty Ltd	Australia	Full service sales and marketing frozen food company including both cooked and non-cooked products.
Seabest Pty Ltd	Australia	Cold store operation.
Markwell New Zealand Limited	New Zealand	New Zealand parent company.
Shore Mariner Limited	New Zealand	Full service sales and marketing frozen food company including both cooked and non-cooked products.
Consolidated Food Company Pty Ltd	Australia	Centralised buyer, financier & logistics of protein products to multiple, global QSR operators.

2. Our Structure, Operations and Supply Chain

CFA's Board is responsible for overseeing performance and operations of the Group, sets the Group's values and governance framework and monitors culture and compliance within a set of policies including a code of conduct that exists at each operating business level. The Board is assisted by the CEOs and management teams who are tasked with managing compliance and risk for each operating business and are responsible for ensuring that all laws are adhered to including the Modern Slavery Act. During FY2025, the Modern Slavery Working Group continued to assist CFA in fulfilling its responsibilities for anti-slavery initiatives across the Group.

The CFA Group employs close to 27,000 staff in Australia. Our workforce encompasses restaurant staff, restaurant support staff, production staff and other office administration positions. CFA have a diverse and inclusive workplace with 49.7% of our staff identifying as female. CFA undertake regular independent wage audits to ensure that our pay and conditions of employment are in accordance with our agreements, standards and legislation.

CFA APPROACH

The supply chain of the Group is diverse and includes major food & packaging suppliers critical for the operation of food related businesses, supported by a network of Australian based distribution services. The supply chain includes a variety of overseas sourced products including packaging, cleaning products, food related products and ingredients, and staff uniforms, most of which are manufactured in China or South East Asia.

CFA have established the following governance framework in respect to approving suppliers:



In simple terms, all permanent suppliers undertake the audit process which includes:

- a safety and quality audit, and
- a Modern Slavery review

The Modern Slavery review commenced in FY2020 and has been rolled out across the Group's supply chain for all operating businesses. Passing these reviews results in the supplier being appointed to the "Approved Supplier

Program”. As part of this program, our suppliers are regularly assessed for compliance within the Modern Slavery Act and many of our suppliers are subjected to independent audits.

Non-conformances identified during this review/audit process are required to be resolved (to the satisfaction of CFA) within set timeframes depending on the criticality of the breach. During the time taken to address non-conformances such suppliers may be terminated or removed off the Approved Supplier list if non-conformance is unlikely to be remedied.

CFA POLICIES AND PROCEDURES

CFA’s major subsidiaries already have policies in place that are intended to promote ethical and legally compliant business conduct. These policies contribute to CFA’s commitment to prevent violations of human rights such as modern forms of slavery in its business and supply chain. Such policies include our Code of Business Ethics and Conduct for Suppliers, and associated policies such as a whistle-blower policy which are designed to protect the rights of our employees and suppliers.

More generally, key policies and procedures in place to support and protect employees and promote ethical sourcing include:

- Operating Company Employee Code of Conduct;
- Operating Company Supplier Code of Conduct;
- Operating Company Anti-Discrimination Policy;
- Operating Company Bullying, Diversity and Harassment Policy;
- Operating Company Ethics and Integrity Policy;
- Operating Company Workplace Health and Safety Policy;
- Operating Company Workplace Grievance Policy;
- Operating Company Whistle-blowers’ Policy; and
- Ethical Sourcing Policies which are in place across all CFA’s major businesses.

3. Describe the Risks of Modern Slavery practices in the Operations

Hungry Jack's Australia Pty Ltd "HJA" and Hungry Jack's Pty Ltd "HJPL"

These entities own and/or operate 401 company QSR's employing more than 26,000 staff within HJPL's operations and support a further 80 Franchisee QSR's under HJA.

HJA's and HJPL's operations in Australia require the support of various internal departments, primarily located at HJPL's Restaurant Support Centre, including development, operations, food innovation, marketing, supply chain, legal, finance, human resources and information technology.

As a party to the Master Franchise Agreement with Burger King (owned by Restaurant Brands International Inc (NYSE:QSR), HJPL and HJA have access to and generally must comply with their global policies, processes and ethical supply chain standards.

HJPL and HJA take a proactive approach in employing its workforce, ensuring its hiring practices align with the standards set by the Modern Slavery Act.

To mitigate this risk of non-compliance with the standards, HJPL:

- Has entered into an Enterprise Bargaining Agreement (EBA) with its employees which is reflective of the Fast Food Award.
- Operates under a strong employee governance structure with strict policies, procedures and training processes to ensure that all of our employees are treated appropriately, paid fairly and are provided suitable working conditions.
- Is subject to external and internal audits to ensure that our pay and conditions of employment are in accordance with our agreements, standards and legislation.

HJPL undertakes regular due diligence including site visits, inspections and multiple audits. These include Burger King audits and independent wage audits to ensure compliance with the EBA. HJPL believe the risk of modern slavery events being present in the franchisee network is low.

HJPL implemented Workday in April 2025 and will roll out WageSafe in FY2026. HJPL has previously upgraded its rostering, time and attendance system and together these software systems have all enhanced its employee governance and compliance with our EBA.

SUPPLY CHAIN OVERVIEW

The HJPL supply chain includes the following products and services:

- (a) **Core Suppliers** that provide product and services to our restaurants include:
- food and beverage suppliers including packaging;
 - distribution partners and delivery aggregators;
 - cleaning chemical supplies;
 - suppliers of equipment used in our restaurants; and
 - uniform providers.

(b) **Non-Core Suppliers** include:

- development and construction suppliers;
- accommodation providers;
- marketing agencies;
- information technology;
- professional services providers of legal and financial services;
- human resources; and
- sanitary, pest control and maintenance services.

HJPL sources its products from established Australian and International suppliers that are subjected to a comprehensive supplier approval process that requires them to have a minimum standard of social responsibility and good manufacturing/quality control practices to the standard of Global Food Safety Initiative Accreditation.

Hungry Jack's suppliers are periodically assessed by an independent auditor and must go through the Hungry Jack's/Burger King global audit process which includes a food safety/quality audit and a modern slavery review.

HJA franchisees do not comprise part of HJPL operations and supply chain for purposes of this Statement, however our franchisees use the same Core Suppliers as HJPL owned and/or operated restaurants and as documented in the Franchise Licencing agreement, each Franchisee must adhere to all laws including the Modern Slavery Act. In addition, HJA franchises are randomly selected for payroll audits by our independent payroll auditor.

As part of HJPL standard recruitment process, HJPL validate all candidates' details through third party provider, Check Work Rights (CWR) to confirm their working rights in Australia before they are offered employment which ensures that they are compliant with regulations and that they continue to maintain a lawful and fair recruitment process.

For employees who are on a VISA, regardless of the type, HJPL continue to monitor their status in CWR throughout their employment or until they obtain Australian residency.

In cases where HJPL face recruitment challenges in regional locations, they utilise the services of an Immigration agent for any Designated Area Migration Agreement (DAMA) application or VISA sponsorship that may be required. This approach allows HJPL to support their recruitment efforts effectively and ensure that they have access to the necessary talent in those regional areas.

Comgroup Supplies Pty Ltd (Australia) (“CGS”) and Comgroup Supplies New Zealand (“CGSNZ”)

CGS and CGSNZ are a leading food manufacturing organisation operating across two sites in Brisbane, Australia and one facility in Pukekohe, New Zealand. CGS converts protein and ingredients into raw and cooked finished goods for retail and foodservice customers worldwide.

CGS acknowledges the inherent modern slavery risks that exist within the food manufacturing industry, including reliance on seasonal labour, temporary workforce arrangement and migrant workers.

CGS recognises two key inherent risk factors namely:

- Seasonal Workforce Demand – fluctuating labour needs can increase reliance on temporary or casual labour, which may be more vulnerable to exploitation; and
- Migrant Workers – employees under Australian or NZ visa arrangements may be more susceptible to coercion where their immigration status is employment-linked.

Despite these risks, CGS assesses its likelihood of causing, contributing to, or being directly linked to modern slavery as low due to robust governance frameworks, compliance processes and ethical employment practices.

In Australia, all employees are paid in accordance with the Meat Industry Award 2020 (MA000059). Wages are updated annually following the Fair Work Annual Wage Review whilst in New Zealand, employees are at or above minimum wage requirements.

Both CGS and CGSNZ operate under a strong employee governance structure with strict policies, procedures and training processes to ensure that all of our employees are treated appropriately, paid fairly and are provided suitable working conditions.

In addition, CGS have also undertaken and continue to undertake a review of their workforce which has resulted in an active reduction of staff obtained from labour hire/agency suppliers and a transition of certain staff to casual or part time employment. This is resulted in CGS having more certainty and control over individual staff pay and conditions.

SUPPLY CHAIN OVERVIEW

CGS and CGSNZ’s supply chain includes the following products and services:

(a) Core Suppliers include:

- Protein (beef, chicken, pork – ~90% by value)
- Ingredients (breadcrumbs, batter, spices, additives)
- Packaging (cardboard, liners, pallets, labels)
- Labour hire workforce providers
- Freight and logistics (domestic and international)

(b) Non-Core Suppliers include:

- IT services
- Manufacturing equipment
- Professional services
- Building and maintenance services
- Cleaning and sanitation chemicals

99% plus of CGS and CGSNZ supplies are sourced domestically in Australia or New Zealand.

CGS and CGSNZ source from highly reputable suppliers which are subject to rigorous quality audits and site visits to ensure compliance with global requirements of its customer base and regulators. These audits now include a Modern Slavery component to specifically ensure obligations are met.

The above coupled with the stringent requirements for sourcing and continual audits as required by our major QSR customers mitigates risk and provides integrity of its supply chain operations. Accordingly, CGS and CGSNZ operations and supply chain are assessed as having low to medium risk of Modern Slavery.

CGS remains committed to ethical, transparent and responsible business practices that protect the rights and wellbeing of all workers. Our modern slavery prevention framework continues to strengthen each year, supported by robust governance, supplier management, training and continuous improvement initiatives.

CGS will continue to advance its systems, processes and culture throughout FY2026 to uphold its responsibility to employees, customers, regulators and the communities in which CGS operate.

Markwell Foods

Markwell Foods includes the operations of Markwell Pacific Marketing Pty Ltd (“MPM”), Seabest Pty Ltd and Shore Mariner Limited (New Zealand). The businesses are focused on the purchase and import of frozen food products into both Australia & New Zealand from a wide range of approved suppliers, located both locally and globally. The products are then sold and are supported by sales and marketing expertise through all major distributors which provide large scale, efficient delivery of Markwell Foods products to thousands of outlets every day including restaurants, cafes, hotels, supermarkets, route outlets and other foodservice customers. As part of its cold chain management, Seabest also operates a cold store in Queensland under the trading name of Markwell Cold Storage. The storage and distribution component within the rest of Australia and New Zealand is handled through various 3rd party service providers, except for storage in Queensland which is handled at Markwell Food’s own facility.

SUPPLY CHAIN OVERVIEW

Markwell Foods supply chain includes the following products and services:

(a) **Core Suppliers** include:

- seafood (raw and value added);
- potatoes (french fries);
- dairy (cheese appetiser products);
- vegetables;
- berries; and
- meat (processed / value added).

(b) **Non-Core Suppliers** include:

- information technology;
- professional services providers of legal and financial services and
- human resources.

Approximately 20% of products are sourced from Australian suppliers. There are some imported products which are sourced from locations deemed as high-risk in terms of modern slavery based on geographical locations.

Markwell Foods has assessed the overall risk of modern slavery in its supply chain as low to medium based on the following:

- In order to meet our requirements, suppliers are of a scale and sophistication to meet the demands of Markwell Food's customer base. The majority of products come from large multi-nationals who have well developed governance structures in place who recognise the risks of Modern Slavery.
- Markwell Foods has typically held long-standing "partner" relationships with its Core Suppliers and has worked over the years to ensure quality, integrity and trust in the supply chain.
- All domestic and international suppliers of Markwell Foods are subject to the same stringent approval process which typically includes site visits and commitment to quality assurance programs and ongoing audits required to meet the standards of the end user customer base, being large Australian retailers, restaurants etc. These audits now specifically assess compliance with the Modern Slavery Act.

Markwell Foods has for many years operated a Supplier Approval process requiring both existing suppliers and potential new suppliers to complete updated annual declarations. From 2021, our new Supplier Approval process was modified to include specific declaration requirements in relation to Modern Slavery compliance as part of the process.

Consolidated Food Company Pty Ltd (CFC)

Consolidated Food Co (CFC) combines market intelligence, expertise and centralised global buying power to finance and deliver meat products for a range of large QSR operators in multiple global geographies. CFC develops good working relationships with its Core Suppliers and engages closely with them on a regular basis. The risk of Modern Slavery within CFC operations is assessed as low to medium.

SUPPLY CHAIN OVERVIEW

(a) **Core Suppliers include:**

Packers

- Packers are well-established abattoirs/meat processors which supply the raw meat product.
- CFC currently sources from around 30 packers and over 50 packer facilities located globally including Australia, New Zealand, USA, Canada and Brazil.

- Each packer and packer facility are quality audited and approved by the QSR operator.

Grinders

- Grinders process the raw meat product into finished goods for distribution through the relevant QSR supply chain.
- CFC currently delivers into around 20 grinders located globally including Australia, USA, Canada, Philippines and Malaysia.

Cold Storage Facilities

- Store perishable products at controlled temperatures
- Provide services including short to longer term storage, inventory management, goods handling, customs inspection.
- Located in USA and Canada.

(b) Non-Core Suppliers include:

- Information technology.
- Professional services providers of legal and financial services; human resources.

CFC only deals with suppliers who are pre-approved and conform to the stringent qualifications dictated by its multinational supply chain QSR customers including Burger King Corporation and Inspire Brands which are heavily focused on and enforce an ethical supply chain.

The food supply industry is well established and well-regulated in the jurisdictions from which CFC source product. Accordingly, CFC has rated suppliers in these geographies as being of low to medium risk of modern slavery. Many active suppliers maintain ethical or social compliance policies which align with recognised standards such as United Nations Universal Declaration of Human Rights. In addition, and where possible, CFC monitor active suppliers' ethical audits and follow up with suppliers where any critical risks are identified to understand how and when these are being addressed to help ensure that active measures and controls are in place to mitigate risk of modern slavery.

4. Actions Taken to Address Risks

During FY2025, CFA has taken a targeted risk-based approach to our Modern Slavery practices across our operations and supply chains. More specifically, CFA:

- Continues to convene a Modern Slavery Working Group comprising staff from various disciplines including procurement, finance, operations, HR, safety, risk and legal;
- Completes assessment of all Core Suppliers identified as at high risk;
- Continues to use SEDEX (Supplier Ethical Data Exchange) across CFA;
- Continues to review the SEDEX Members Ethical Trade Audit (SMETA) findings of our suppliers together with progress of corrective actions;
- Continues to have direct engagement with our supply partners for those suppliers not on SEDEX;
- Continues to ensure our Codes of Conduct, contract terms and purchase orders include provisions requiring compliance with modern slavery legislation;
- Completed a rigorous review of the supplier selection process with additional measures implemented to better assess risk levels;
- Periodic supplier business review agendas have been updated to include SEDEX, Modern Slavery and ESG including Ethical Sourcing items so that they are embedded within all formal supplier discussions;
- Continue to train and raise awareness amongst key management and executives on Modern Slavery risks to ensure that they act accordingly to ensure the risk remains low in our operations and network.

SEDEX

CFA partnered with SEDEX back in October 2021 to further understand potential risks of modern slavery in our supply chains.

SEDEX is a global organisation that provides tools, services, and a collaborative platform to help businesses improve ethical and sustainable practices within their supply chains. It is widely used across industries to manage data related to labour standards, health and safety, the environment and business ethics. SEDEX has over 20 years' expertise and provides supply chain solutions for all businesses, including SMETA, the world-leading social audit. They have over 95,000 global members across 180 countries.

For SEDEX suppliers, CFA initially complete a pre-screen mapping of the inherent risk score of our suppliers across our network. The inherent risk score is on a scale of 0 – 10 with a score closer to zero being low risk and closer to 10 being extreme risk. The inherent risk score maps country risk, sector risk and commodity risk for areas such as forced labour, health & safety, wages & working hours, energy, waste & pollution.

Key CFA statistics from this risk score determined:

- 64% of our supply chain is domiciled in Australia/New Zealand
- 91% of our supply chain is in the manufacturing/processing sector
- 76% of our supply chain is considered low or medium risk

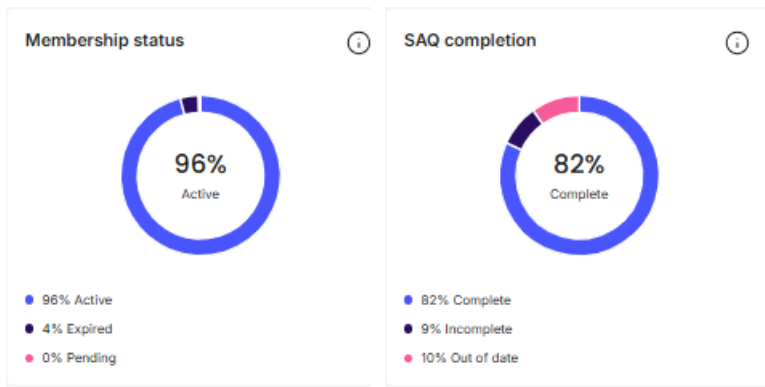
CFA continue to approach our suppliers to strongly encourage them to either:

- (i) Join SEDEX if they were not already SEDEX members, or
- (ii) Link CFA to their existing SEDEX membership

As at 12 December 2025, 266 suppliers have been linked to CFA which represents a 90% increase in SEDEX suppliers linked in comparison to last year.

Of the 266 suppliers, 185 suppliers or 70% have been subject to an independent SMETA audit representing a 3% increase in comparison to last year. Pleasingly, following audit completion the Overall Risk Score has improved 61% of the time and 80% of audit non-compliances (NC’s) have appropriate corrective actions in place and are closed as at 12 December 2025.

96% of our SEDEX suppliers have active memberships and 82% have completed their self assessment questionnaires (SAQ). CFA will follow up with our 9% of suppliers with incomplete SAQ’s and the 10% of suppliers that have not completed a SAQ in the past year which SEDEX considers to be ‘out of date’.

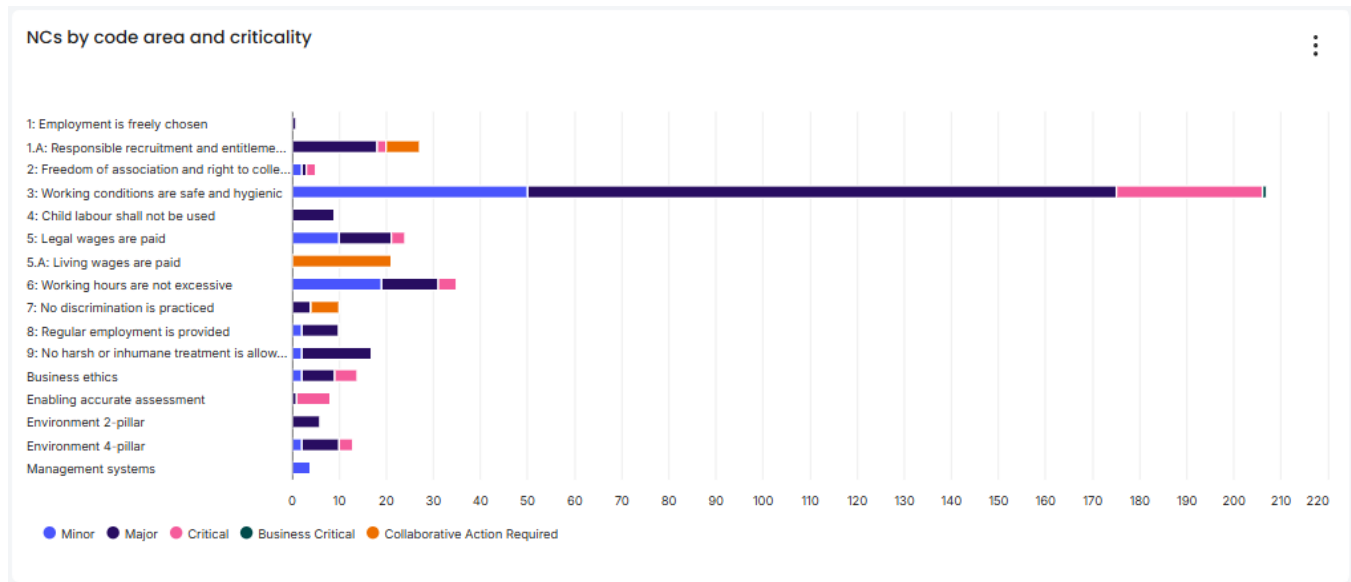


The combined overall risk score for our suppliers linked to SEDEX indicates that 203 suppliers (76%) are low or medium risk with 63 suppliers (24%) assessed as high risk. This doesn’t take into consideration those suppliers that are still awaiting classification.

High risk supplier focus

Of the 63 high risk suppliers, 45 suppliers (71%) have undertaken a SMETA audit. These high-risk suppliers are spread across each of our operational companies and mainly consist of local and global manufacture and procurement of protein (meat and fish), dairy, fruit and vegetables.

During FY2025, SMETA audits conducted on 19 of our high-risk suppliers identified 411 non-compliances (NC’s) with 353 (or 86%) of NC’s being minor, major or collaborative action required whilst 58 (or 14%) of NC’s were critical or business critical. 207 (or 50%) of the 411 NC’s related to ‘Working Conditions are Safe and Hygienic’.



Given the obvious outlier for ‘Working Conditions are Safe and Hygienic’, CFA investigated these FY2025 NC’s in more detail, which disclosed the following:

- Of the 207 NC’s identified, 141 (or 69%) of the NC’s now have appropriate corrective actions in place and are closed as at 12 December 2025 with 66 (or 31%) of NC’s still overdue mainly arising from more recent SMETA audits however CFA will track these NC’s during FY2026 to ensure appropriate corrective actions are undertaken;
- Of the 32 critical or business critical NC’s in this category, 26 (or 81%) of these NC’s related to fire safety and compliance with fire exits, evacuation plans, fire alarms/equipment, fire drills or fire compliance needing some improvement. Pleasingly 22 (or 69%) of the 32 critical or business critical NC’s now have appropriate corrective actions in place and are closed as at 12 December 2025 with the remaining 10 (or 31%) of critical or business critical NC’s arising from more recent SMETA audits however CFA will track these NC’s during FY2026 to ensure appropriate corrective actions are undertaken.

SEDEX Future focus

During FY2026, CFA will continue to engage our Non-Core Suppliers to highly recommend that they join SEDEX. For those suppliers that are not on SEDEX, CFA will continue to internally review and monitor potential risks of modern slavery practices across our operations and supply chains. Our methodology includes identifying suppliers potentially posing heightened risk i.e.:

- (i) global suppliers operating in jurisdictions without the same robust employee care regimes that exist in Australia and New Zealand; and
- (ii) suppliers which operate in industries with a larger representation of vulnerable workforces based on demographics (age, immigration status, low wage, unskilled etc.).

The suppliers with the highest risk rating within each operating business will continue to be sent a CFA questionnaire to gain assurance of their compliance with the Modern Slavery Act.

CFA will undertake the above by engaging with our suppliers in our structured supplier meetings where audit results, supplier questionnaire responses, Modern Slavery and ESG requirements will be included as agenda items.

CFA will undertake a continuous assessment of its operations and supply chain to ensure improved transparency and to further understand our potential risk of modern slavery within our network.

CFA WHISTLEBLOWER

CFA continues to operate a non-retail business Whistleblowing policy that allows both internal (staff) and external stakeholders (e.g. suppliers) to submit Whistleblowing notifications. Employee handbooks/codes of conduct, externally facing websites and internal policies and procedures have been updated to include the policy. The Whistleblowing service continues to run alongside the retail arm Whistleblowing service that Hungry Jack's maintain. The same independent company manages both non-retail and retail CFA Whistleblowing policies and online form/hotline.

Included with each policy is an embedded training plan for senior management on dealing with notifications and a broader awareness campaign both internally and externally.

During FY2025, CFA revitalised its Whistleblowing policies by ensuring that training, communications, policy wording and website links were all operating effectively.

CFA has not received a whistleblowing notification since launching in December 2021.

5. Measuring Effectiveness of Our Actions

For CFA, demonstrated continuity between reporting periods is a key yardstick for how we measure effectiveness of our actions. CFA recognise the importance of tracking the progress of our planned measures described in our Statement last year as summarised in the table below:

Foreshadowed Action in LY statement	Reporting Period (FY2025) Status Update
Modern Slavery Working Group – continuing to meet throughout the reporting period	Complete (and ongoing)
Continue to approach current and prospective Core Suppliers on the importance of SEDEX membership, propose workshops and a targeted supplier questionnaire	In progress. CFA continue to strongly recommend that all existing suppliers and any new suppliers join SEDEX. In December 2022, CFA had 75 suppliers on SEDEX and at 12 December 2025 CFA now have 266 suppliers linked. We have witnessed a very positive response to structured agenda meetings focused on Modern Slavery and SEDEX requirements in lieu of less structured workshops. All CFA businesses continue to issue targeted supplier Modern Slavery questionnaires for those suppliers choosing not to join SEDEX. All our contracts and Supplier Codes of Conduct contain Modern Slavery clauses which CFA believe are fit for purpose
Continued engagement with our Non-Core Suppliers e.g. equipment, development, cleaning & maintenance, IT, professional services etc to invite them to join SEDEX with the importance of membership, potential workshops and a targeted supplier questionnaire	In progress. CFA continue to strongly recommend that all existing suppliers and any new suppliers join SEDEX. Last year, CFA had 140 Core Suppliers on SEDEX and now with the introduction of Non-Core Suppliers, CFA have 266 Core and Non-Core Suppliers linked which represents a 90% increase in membership. We have witnessed a very positive response to structured agenda meetings focused on Modern Slavery and SEDEX requirements in lieu of less structured workshops. All CFA businesses continue to issue targeted supplier Modern Slavery questionnaires for those suppliers choosing not to join SEDEX.
Continue to review SMETA audit recommendations to ensure our suppliers are following through with all corrective actions in a timely fashion	In progress. During FY2025, CFA investigated high risk suppliers who had non-compliances (NC's) in the 'Working Conditions are Safe and Hygienic' category and found that 69% of those NC's had been closed out as at 12 December 2025 with a follow up action required in FY2026 to ensure appropriate corrective

	actions are undertaken for the remaining 31% of NC's in this category.
Continue to refine our remediation strategy for high risk suppliers. This may include the continued assessment of suppliers rating, understanding the supplier risk remediation plan/timing, formal audits/inspections, sourcing products from alternate suppliers or from geographic locations that present a lower risk profile	In progress. CFA believe that our proactive strategy for managing high risk suppliers including proactive monitoring and supplier meetings with a focus on Modern Slavery remains fit for purpose. Our processes have proven successful in identifying, managing and exiting non-compliant suppliers in the past.
General engagement with both Core and Non-Core Suppliers in structured supplier meetings where audit results, supplier questionnaire responses, Modern Slavery and ESG requirements will be included as agenda items	Complete (and ongoing). All our contracts and Supplier Codes of Conduct contain Modern Slavery clauses which CFA believe are fit for purpose. CFA have a mature and enduring base of suppliers with structured supplier meetings taking place at least quarterly. In addition, HJPL facilitated a Supplier Summit in March 2025 and a Convention in August 2025 where structured agenda items covered a broad base of topics which included ethics and compliance.
Broaden the breadth of our training to be undertaken by staff who have supplier selection authority	In progress. All CFA Modern Slavery taskforce members and staff who have direct supplier interaction have undertaken Modern Slavery and SEDEX training however for FY2026 CFA will refresh the training before end of Q1 2026.
Continue to review and update our suite of risk-related policies and governance control measures	Complete (and ongoing). CFA believe that our risk-related policies and governance control measures remain fit for purpose. Our continuous evolution and monitoring of policies and their application has been successful in identifying specific areas for improvement which are rectified on a rolling basis. In addition, HJPL successfully launched Workday in April 2025 which has revolutionised its HR, recruitment and payroll functions and HJPL also undertook 3 payroll audits during FY2025.

In addition, CFA have other instances of Modern Slavery practices working well in our operating companies. Through its processes, CGS / CGSNZ proactively uncovered an instance of unethical labour hire/agency supplier practices in their New Zealand business which was referred to NZ Ministry of Business, Innovation and Employment (MBIE). CGS fully cooperated with Immigration Compliance investigations throughout the issue and received appreciation from the New Zealand Government for proactive action and willing engagement

throughout the process which has now successfully completed. CGSNZ no longer use the labour hire/agency supplier that was subject to the above investigation.

6. Future Actions

CFA recognises the ongoing commitment and consultation required to reduce the risk and impact of modern slavery in our business and supply chain.

During FY2026, CFA's priorities include:

Supply Chain

- Continued engagement with our Non-Core Suppliers e.g. equipment, development, cleaning & maintenance, IT, professional services etc to invite them to join SEDEX with the importance of membership and targeted supplier questionnaire;
- Continue to review SMETA audit recommendations to ensure our suppliers are following through with all corrective actions in a timely fashion and tabling those actions in structured supplier meetings;
- Review SEDEX high risk suppliers with incomplete NC's in the 'Working Conditions are Safe and Hygienic' category and seek to ensure appropriate actions are undertaken before end of Q2 2026;
- Review SEXEX high risk suppliers with critical and business critical NC's in all categories and seek to ensure appropriate actions are undertaken before end of Q2 2026
- CFA will follow up with our 9% of suppliers with incomplete SEDEX SAQ's and the 10% of suppliers that have not completed a SAQ in the past year by end of Q1 2026;
- Refresh Modern Slavery and SEDEX based training across CFA before end of Q1 2026; and
- Review the interplay (if any) between Modern Slavery legislation and AASB S2 Climate Reporting requirements.

Workforce Management

- Workday rollout beyond HJPL to include CFA, CGS and MPM before end of Q4 2026.
- Implementation of WageSafe for HJPL which is a real time payroll compliance monitoring tool.
- HJPL payroll audits will continue on an ad hoc basis and post any WageSafe findings.
- CGS will engage an independent consultant to conduct a payroll audit of their circa 200 staff before end of Q4 2026.
- CGS will expand the grievance and suggestions process "Call It Out" program to increase visibility and incident reporting before end of Q2 2026.
- CGS will enhance onboarding and monitoring processes for visa-dependent workers before end of Q3 2026.

7. Consultation Process and Approval

The Board recognises the risk of modern slavery and is committed to identifying and addressing these risks in both its operations and supply chain.

This Statement has been prepared by CFA in consultation with each reporting entity and it has been approved by the Board of CFA on 30 December 2025 on behalf of all reporting entities. This Statement is made in accordance with section 14 of the Modern Slavery Act 2018 (Cth). It represents the joint Modern Slavery statement on modern slavery for the financial year ended 30 June 2025.



Paul Cowper

Director

31 December 2025