



Tattarang

Modern Slavery Statement

FOR THE FINANCIAL YEAR
ENDING 30 JUNE 2021

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Introduction

On behalf of the Tattarang Group, I am pleased to present our second Modern Slavery Statement.

Last year will rightly be recognised as a turning point in our collective fight against slavery. The publication of the first wave of Modern Slavery Statements by businesses representing a broad cross section of corporate Australia will be remembered as an important milestone.

It showed us that change is possible, and only achievable when we work together.

We also acknowledge those businesses who have chosen to step up with us last year, and we celebrate those who have since joined in the fight, inspired as we are by the critical work of leaders from philanthropy, in governments and by campaigners who continue to hold an immovable spotlight on this intractable issue. In particular, we recognise the vital role of Minderoo Foundation's Walk Free Initiative and its foundational work that enshrined into Australian corporate law, the responsibilities we must rise to under the *Australian Modern Slavery Act 2018 (Cth)*.

However in our collective commitment to eradicating the scourge of modern slavery, there is no time to pause for thought, no opportunity to take stock of what has already been achieved. Ending modern slavery in all its forms, wherever we may uncover its existence, requires our constant vigilance.

The previous 12 months were a period of sustained growth and diversification for Tattarang. As a proudly Western Australian company with a fast-growing group of operating businesses, some of which have only recently been acquired or started, our investment portfolio continued to grow, creating value and providing opportunities for the communities in which we operate.

During the year Tattarang completed many acquisitions while also expanding our operating businesses. We know that as Tattarang continues to grow, so does the spectres of slavery entering our supply chains. Again, the words of our Chair Dr Andrew Forrest AO remind us of this ever present danger:

“We are all going to have slavery in our supply chains no matter how good we think our corporate social responsibility is. If we focus on it then we can identify it and root it out”.

Much more still needs to be done, and we remain committed to act and progress towards our shared goal of ending modern slavery in all its forms.

That is why we take this opportunity to renew our commitment to achieving the important objectives we set for ourselves in establishing an effective and robust modern slavery program at Tattarang. This work will continue, and we want, including through this Statement, to be transparent about both the ways in which we have succeeded, and critically, the areas in which much more work is still required.

At Tattarang we remain committed to doing so.

Signed by



Andrew Hagger
Tattarang CEO

30 December 2021

Approval

This joint statement has been published on behalf of four entities - Tattarang Pty Ltd ACN 055 961 361 as trustee for The Peepingee Trust ABN 44 994 119 389, Tattarang Capital Pty Ltd ACN 161 233 674, NEGU Pty Ltd ACN 637 047 066, and Harvest Road Group Pty Ltd ACN 169 138 014 to meet their reporting requirements under the Modern Slavery Act for the year ended 30 June 2021. These four entities and the entities which they respectively control are collectively referred to in this statement as Tattarang Group. Where reference is made to 'Tattarang', this refers to just three of these entities, namely - Tattarang Pty Ltd as trustee for The Peepingee Trust, Tattarang Capital Pty Ltd and NEGU Pty Ltd and those entities which they respectively control. Where reference is made to Harvest Road Group, this refers to Harvest Road Group Pty Ltd and those entities which it controls.

Tattarang Group is one of Australia's largest private investment groups, comprised of a diverse number of operating businesses, as well as a portfolio of minority-stake investments. Our portfolio of operating businesses spans agri-food, energy, resources, property and lifestyle.

Harvest Road Group, Tattarang Pty Ltd as trustee for The Peepingee Trust, Tattarang Capital Pty Ltd and NEGU Pty Ltd are entities managed within Tattarang Group, which each had in excess of \$100m consolidated revenue in the relevant period and are therefore reporting entities under the Modern Slavery Act in their own right. This joint statement sets out details of operations across Tattarang and Harvest Road Group, their supply chain, and measures taken to address risks of modern slavery in line with the criteria set out within the Commonwealth Guidance for Reporting Entities. This joint statement also addresses the activities of other entities which sit within Tattarang Group but are not reporting entities in their own right (see next page).

In addition to Tattarang Group's portfolio of operating businesses, Tattarang Group holds investments in a range of companies operated independently, including Fortescue Metals Group (FMG). FMG's comprehensive approach to addressing modern slavery in its own supply chain and operation is described in the FMG Modern Slavery Statement.

Other aspects of modern slavery risk in Tattarang's investment portfolio, are considered and discussed in this Statement.

Consultation with all reporting entities and entities owned/controlled by reporting entities

These boards have been assisted by the work of the senior leaders and staff, and the relevant central operations functions, including the finance, people & culture, communications, and legal teams. These functions were consulted to understand each business' approach to assessing, addressing and remediating modern slavery risks. Members of Harvest Road Group Pty Ltd, Tattarang Pty Ltd as trustee for The Peepingee Trust, Tattarang Capital Pty Ltd and NEGU Pty Ltd leadership teams participated in the preparation of this statement.

This joint statement was approved by the boards of each of the four reporting entities covered by this statement. The board of Harvest Road Group Pty Ltd approved this statement on 29 December 2021 and the boards of Tattarang Pty Ltd as trustee for The Peepingee Trust, Tattarang Capital Pty Ltd and NEGU Pty Ltd have approved this statement on 30 December 2021.

This statement is signed by a director of each of Tattarang Pty Ltd as trustee for The Peepingee Trust, Harvest Road Group Pty Ltd, Tattarang Capital Pty Ltd and NEGU Pty Ltd pursuant to section 14(2)(e)(i) of the Modern Slavery Act.

Signed by



John Hartman Director

30 December 2021

Our structure, operations and supply chains

Who we are

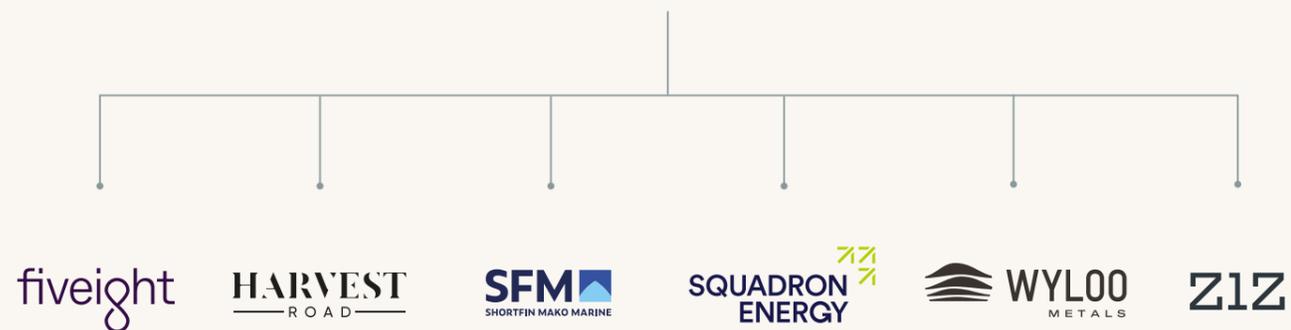
We are a proudly Western Australian investment group with assets in agri-food, energy, resources, property, hospitality and lifestyle.

Whilst the Tattarang Group is diverse in its business operations, it is supported by clear management practices and principles that, among other imperatives, are designed to ensure our values are consistently upheld across the Group.

Our belief is that ethical business practices combined with macro philanthropy has the capacity to create an overwhelmingly powerful force for the common good.

Andrew and Nicola

Andrew and Nicola Forrest



Our operations

The Tattarang Group includes the following:

Harvest Road Group is primarily an agricultural business producing a portfolio of fine food brands for domestic and international markets, exporting to more than 40 countries. This comprises the following:

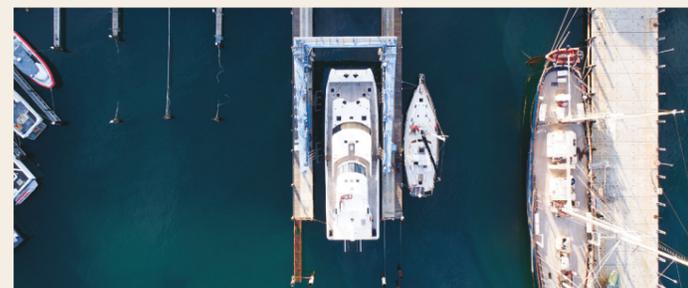
Harvest Road Beef: vertically integrated beef business, spanning six cattle stations and 1.5 million hectares of pastoral properties in Western Australia and a meat processing plant located in Harvey, Western Australia. Harvey Industries Group (under the brand Harvey Beef), Harvest Road Pastoral and Koojan Downs are controlled entities that sit within Harvest Road Beef.

Harvest Road Oceans: under the brand Leeuwin Coast and consists of three aquaculture farms producing Akoya and oysters.



Fiveight owns, invests in, develops and manages residential, commercial and industrial property across Australia. Its model is based on the strategic ownership of assets with the potential to generate returns and benefit the communities around them.

Z1Z invests in lifestyle services, products and experiences that bring the unique essence of Australia to its patrons. Z1Z invests in a broad range of categories including hospitality, sport and fashion. The Z1Z brand mark came from the original and literal brand of Minderoo, used on stock and horses.



As one of Western Australia's premier marine maintenance companies, **SFM Marine** services cover lift and launch, boat engineering, fabrication, boat building, painting, antifouling, prop-speed vessel detailing and marine training. SFM Marine has operations in Henderson and Fremantle, Western Australia.

Wyloo Metals conducts exploration, develops and invests in the next generation of mines. It manages a diverse portfolio of wholly owned exploration projects and cornerstone investments in both public and private companies across Australia, with acquisitions in Canada during the reporting period.



Squadron Energy invests in initiatives, research, technologies and projects that support the rapid transition to a zero emissions economy. It is focused on development projects across solar energy and battery storage, natural gas, wind power generation, energy-related infrastructure, including the development of a dual-fuel (gas and green hydrogen) power station at Port Kembla, New South Wales. Squadron Energy's other investments include Windlab – developer of world-leading wind farm technology – and Sun Cable which aims to develop Australia's competitive advantage in solar energy, creating a new domestic and export market in electricity.

Tattarang completed its acquisition of R.M.Williams during the reporting period. R.M.Williams is one of Australia's most iconic brands, famous for handcrafting the best boots in the world in its Adelaide workshop. We are proud to continue the legacy of this great company, and continue to apply our values that are deeply ingrained both within the R.M.Williams brand and the Tattarang Group.

However, we recognise that, from a modern slavery risk perspective, any business with core operations in the clothing, apparel and footwear industries, coupled with a significant international presence, is exposed to significant potential areas of modern slavery risk. The mandatory reporting requirements in relation to R.M.Williams' supply chains and operations are being addressed under a separate modern slavery statement to be lodged by R.M.Williams under the Act for this reporting period.

Since completing the acquisition of R.M.Williams, members of R.M.Williams team have also worked with Tattarang's modern slavery working group which includes members of Minderoo Foundation's Walk Free Initiative. The commitment to holistically addressing modern slavery that is common throughout all entities within the Tattarang Group will be pursued with equal determination for the ongoing operations of this iconic Australian brand.

A significant part of our operations are our investments. Outside of the entities listed above, Tattarang makes significant private equity investments and investments through an external fund manager. We understand the complexity of the supply chain in our investments and are continuing to address modern slavery both within our private equity portfolio and with our external fund manager.



Our Values and Commitment to ending modern slavery

At Tattarang Group, our 10 values are at the heart of everything we do. They drive our culture and philosophy and underpin our approach to conducting business.

We are committed to acting ethically and with integrity across all aspects of our business. We strive to uphold and protect the rights of all of those who work for, or on behalf of, the Tattarang Group. We are also committed to protecting and respecting the rights of people who may be impacted by our activities, including those in our supply chains.

We acknowledge the risk of modern slavery occurring in our own operations and supply chain, and that significant resources must be invested in building effective systems and processes to address these risks. We also acknowledge that we have more work to do to formalise and fully embed these systems and processes.

As with the first reporting period, the Tattarang Group has continued to experience significant growth. This growth included a number of acquisitions as well as organic growth across our central operations teams.

Building on the foundation laid during the first reporting period, we now have a deeper and more comprehensive understanding of the range of modern slavery risks we face across our businesses.



<https://cdn.tattarang.com/content/uploads/2021/04/01083706/Tattarang-Modern-Slavery-Statement-2020.pdf>

Our Values

Courage & Determination

NEGU —we never ever give up.

Generating Ideas

Always be on the lookout for breakthroughs.

Empowerment

Go to your leader for advice, not permission.

Humility

Be vulnerable, take risks to trust others.

Enthusiasm

Be the most positive person in the room.

Integrity

Do what you say you're going to do.

Family

Support each other, always be kind.

Safety

Look out for your mates and yourself.

Frugality

Think of ways we can do things better, faster, cheaper, safer.

Stretch Targets

Always be uncomfortable with your level of challenge.

Our employees

Tattarang’s workforce (excluding R.M.Williams) is comprised of 300 staff working across our operating businesses. Of this total, 117 employees sit within the central operations team while 183 employees work within the operating businesses. Additionally, Harvest Road Group employs a total of 741 employees within their operating businesses and support departments.

99.9% of the Tattarang Group’s workforce is based in Australia and employed in compliance with local laws and regulations. Our employment terms and conditions of employment are underpinned by the Fair Work Act and the National Employment Standards (NES).

Our contracts of employment set out the minimum terms and conditions of employment, in line with the NES, including:

- Hours of work;
- Remuneration;
- Leave entitlements, including annual leave, public holidays, parental leave, compassionate leave, personal/carer’s leave, community leave, jury service leave and family and domestic violence leave;
- Benefits; and
- Notice period.

The Tattarang Group’s workforce includes full time, part time, casual and fixed term contract employees. 80% of our workforce are permanent full and part time employees as shown in the table below.

Tattarang (excluding R.M.Williams)	Full time	Part time	Fixed term contract	Casual	Total
Fiveight	6	8	-	-	14
SFM Marine	39	1	-	1	41
Squadron Energy	13	-	9	-	22
Wyloo Metals	5	1	1	-	7
Z1Z (including Z1Z hospitality and sport)	21	-	48	30	99
Central Operations	14	93	9	1	117
TOTAL	98	103	67	32	300

Harvest Road Group	Full time	Part time	Fixed term contract	Casuals	Total
Harvest Road Group	28	0	0	2	30
Harvest Road Beef	583	3	4	99	689
Harvest Road Oceans	19	1	0	2	22
TOTAL	630	4	4	103	741

COMBINED TOTAL	728	107	71	135	1041
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Our supply chain

The Tattarang Group’s supply chain encompasses a wide and varied network of over 3400 Tier 1 suppliers. We have continued to focus on these direct suppliers as a priority in our modern slavery risk management activities to date.

Whilst we source from suppliers across 29 different countries, 99% of our spend is with Australian headquartered businesses, though we acknowledge that goods may still be sourced from overseas locations.

Outside of Australia, our next biggest country spend is Argentina with 1% of supplier spend. Where possible, we prioritise sourcing from local suppliers.

Across the Tattarang Group, our main categories of spend include Cost of good sold (55%), Capital works in progress (16%), Production inputs (5%), Consultants (2%) and Legal expenses (1%).

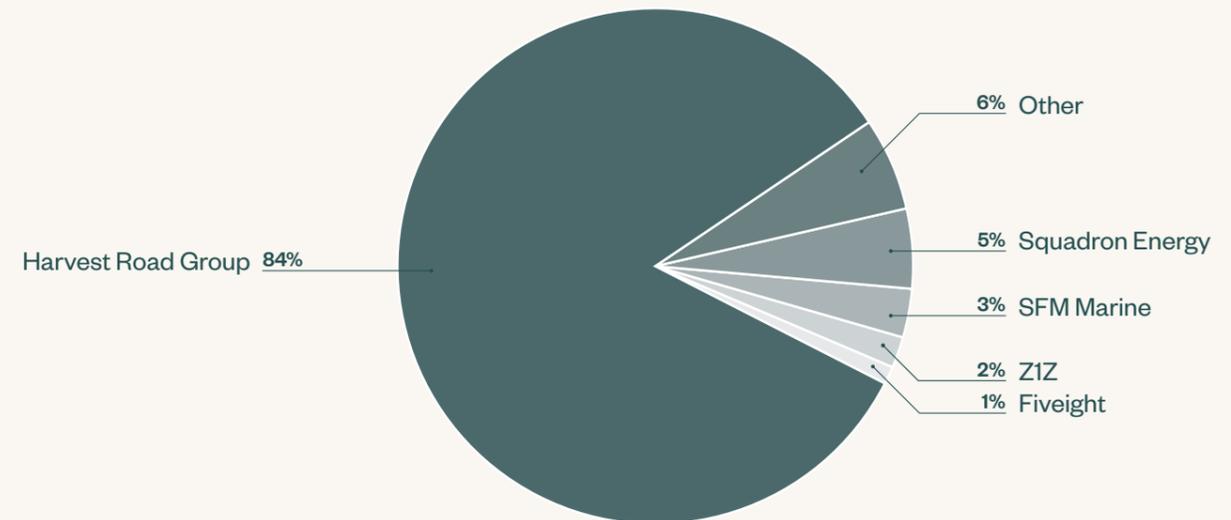


Figure 01: Supplier spend by brand

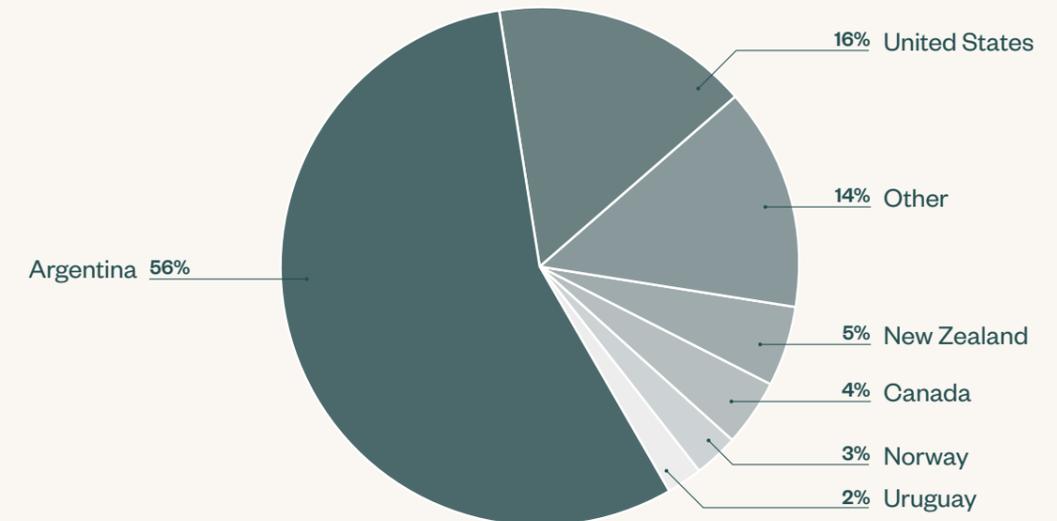


Figure 02: Non-Australian supplier spend by country



Supply Chain (Tier 1)

Our supply chain encompasses:

- Suppliers that we purchase goods or services from.
- Investments (companies and managed funds that we invest into).

*Farming in Sierra Leone
Photo credit: Annie Sprattt via Unsplash*

Extended Supply Chain (Tier 2)

- Our suppliers' suppliers.
- Our investees' suppliers.

We acknowledge that for each of these categories, a tailored approach is needed to identify, monitor, and address the risk of modern slavery occurring in our operations and supply chain.



Our approach to assessing and addressing risk: Modern Slavery Framework Tattarang Group

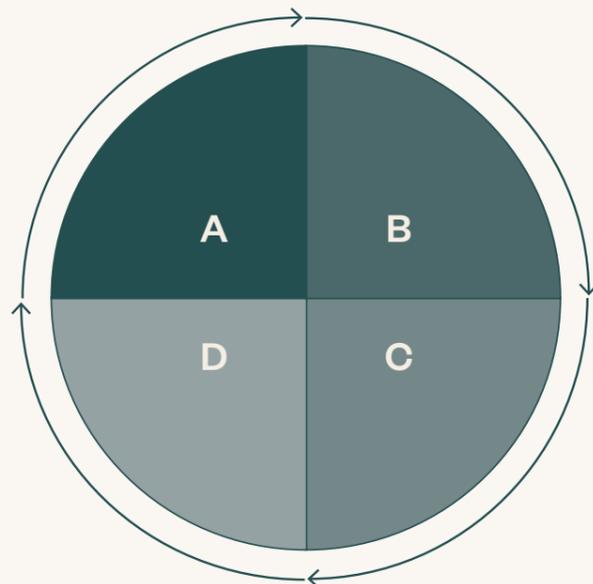
The Tattarang Group is committed to continually improving our approach to addressing modern slavery, guided by our Modern Slavery Framework.

As detailed in our First Statement, our Modern Slavery Framework comprises four key areas of focus:

- A. Governance**
- B. Risk Assessment**
- C. Supplier Engagement, Corrective Action & Remedy**
- D. Training & Collaboration**

Significant progress has been made during this reporting period in each focus area. We have clearly defined ongoing priorities in each area to further each focus. The following is a detailed summary on the progress, achievements, and ongoing priorities in our overall modern slavery response.

Figure 03: Modern Slavery Framework



- | | |
|--|--|
| <p>A. Governance</p> <ul style="list-style-type: none"> • Board of Directors • Modern Slavery Steering Group • Our policies • Our contractual arrangements | |
| <p>B. Risk Assessment</p> <ul style="list-style-type: none"> • Supply chain mapping • Risk Assessment Framework to screen all suppliers | |
| <p>C. Supplier Engagement, Corrective Action & Remedy</p> <ul style="list-style-type: none"> • Supplier Code of Conduct & Onboarding Process • Supplier Self-Assessment Questionnaire, due diligence & follow-up engagement • Supplier audits and site visits • Corrective action & remediation | |
| <p>D. Training & Collaboration</p> <ul style="list-style-type: none"> • Staff training • Supplier training and awareness raising • Collaboration with peers, industry bodies, government and business | |

Governance

The Board of Directors, of each business, hold ultimately responsibility and oversight of the organisation’s risk management including (but not limited to) modern slavery.

The organisation’s Modern Slavery Project Team has expanded in scope throughout the reporting period to now comprise a Project Sponsor, Steering Committee and Working Group. This ensures increased expertise, focus and insight. The Project Sponsor champions the project, providing high level direction and ensuring roadblocks are removed so the organisation can continually improve.

Each of the members of the Modern Slavery Project team provides a unique insight and such diversity ensures that the organisation’s modern slavery response is holistic.

Since establishment, our Modern Slavery Steering Committee has met fortnightly and our Working Group has met weekly, focusing on strengthening and embedding our modern slavery framework throughout the portfolio of businesses and investments.

Over the next reporting period, the Working Group will take on more of a governance role as the organisation will move towards operationalising the assessment and addressing modern slavery risk throughout the organisation. As such addressing modern slavery risk will become “business as usual” for the organisation in its entirety.

Contractual arrangements

One of our key focus areas during the reporting period was ensuring that our agreements and contractual provisions reflect our expectations on modern slavery.

We have updated our standard contract templates and template clauses imposing obligations on our business counterparties to take action to identify and address modern slavery risk in their businesses and supply chains.

It is always our preference to use our template contracts, which impose obligations on the counterparty to address a number of modern slavery-related issues. These include complying with all applicable anti-slavery legislation, investigating labour practices and supply chains, and promptly addressing any cases of modern slavery or related exploitation and reporting these to us. We will work with counterparty’s to ensure that they can demonstrate compliance with these obligations, if required.

Policies

Our policy framework includes Tattarang’s Modern Slavery Policy, Whistleblower Policy, Procurement Guidelines, Supplier Code of Conduct and Remedy Action Plan. During the next reporting period we focused on embedding and operationalising these policies throughout the organisation.

To ensure everyone across the organisation is aware of our policies, we have presented the framework at the organisation-wide ‘Town Hall’ meetings and presented to senior leaders throughout the business, in addition to including relevant details within our Code of Conduct and in emails to all staff.

Our internal Modern Slavery Training which was required to be completed by all staff, also includes reference to these policies and how they work in the organisation (for example, how to raise grievances or report concerns).

The Table on the next page summarises the key policies that have been specifically developed or updated as part of our governance response to modern slavery and a brief description of the purpose of each policy.

In instances where we are unable to use Tattarang’s standard contracts, our preference is that similar modern slavery obligations are included into the counterparty’s agreement.

We will be including modern slavery clauses into our Purchase Order Terms and Conditions as we continue to roll out Purchase Orders across Tattarang. This will ensure that all suppliers, even those without a standard contract, will be required to comply with our expectations on modern slavery. We see this as a valuable addition not simply because it imposes contractual obligations on suppliers, but also because it acts as a springboard for meaningful supplier engagement and collaboration. Raising awareness and engaging suppliers is crucial to effectively combatting modern slavery.

Policy	Purpose of the policy
Code of Conduct	The Code of Conduct provides advice and guidance on how to conduct business ethically and in accordance with all applicable laws, regulations and policies. It includes our commitment to human rights in relation to all people including employees, partners and communities in which we operate and prohibition on all forms of modern slavery. It is not an exhaustive set of rules, but a set of guiding principles aligned to our values and culture.
Whistleblower Policy	The Whistleblower Policy provides a practical tool to encourage and facilitate the disclosure of wrongdoing in our working environment and to ensure that people who disclose wrongdoing can do so safely, securely and with the confidence they will be protected and supported.
Modern Slavery Policy	<p>The Modern Slavery Policy outlines our commitment to protecting and respecting the rights of all people, including our employees, partners and those who may be impacted by our activities, and describes how we seek to deliver on our commitment.</p> <p>Tattarang Group's commitment to ending modern slavery is underpinned by core principles which include:</p> <ul style="list-style-type: none"> • No forced or bonded labour. • No worker should pay for a job. • Workers should be treated and paid fairly for the work they do • No child labour. • Respect rights of workers to freedom of association. • Workers should be able to raise grievances safely. <p>These core principles have been informed by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the ILO Core Conventions on Labour Standards and the United Nations Global Compact. Tattarang asks that all those we engage with – our suppliers, consultants and contractors – work with us to uphold these core principles.</p>
Supplier Code of Conduct	The purpose of the Supplier Code of Conduct is to outline our expectations of suppliers and their conduct regarding the core principles listed above. This includes workplace health and safety, environmental protection, and ethical practices. We expect that suppliers investigate their labour practices and supply chains, and promptly address any cases of modern slavery or related exploitation and report these to us.
Procurement Guidelines	The purpose of the procurement guidelines is to assist purchasers to make conscious supply choices with suppliers that align with Tattarang's values.
Remedy Action Plan	Our Remedy Action Plan provides guidance and practical steps (see page 22) to assist our response when we identify instances of modern slavery or related exploitation across the Tattarang Group.

Harvest Road Group

Further to the policies in place across the Tattarang Group, Harvest Road Group has its own suite of policies to support the management of modern slavery risks. These policies are more tailored to the Harvest Road Group's business operations and reflect the longer history of its business, the consequential maturity of its risk management approach, as well as the higher inherent modern slavery risk associated with its operations.

Policy	Purpose of the policy
Code of Conduct	The Code of Conduct provides advice and guidance on how to conduct business ethically and in accordance with all applicable laws, regulations and policies. It includes our commitment to human rights in relation to all people including employees, partners and communities in which we operate and prohibition on all forms of modern slavery. It is not an exhaustive set of rules, but a set of guiding principles aligned to our values and culture.
Whistleblower Policy (revised)	The Whistleblower Policy provides a practical tool to encourage and facilitate the disclosure of wrongdoing in our working environment and to ensure that people who disclose wrongdoing can do so safely, securely and with the confidence they will be protected and supported.
Employee Handbook	Employment Handbook outlines the responsibility of the company to provide the best possible working conditions for all of its employees. It aims to provide the most appropriate information to each individual for their position requirements and includes sections regarding probation, remuneration, hours of work, attendance, corrective action, meal breaks, superannuation, training and development. Although this policy doesn't directly talk to modern slavery, the requirements address the associated common risks.
Recruitment and Selection Policy	<p>The Recruitment and Selection policy provides the framework within which management and staff appoint the most capable people to roles across the organisation, specifically within the legal bounds of working age. The policy assists staff to recruit the person whose competencies best match the job requirements, understand the Equal Opportunity Legislation and align to the Company's desire to develop existing employees.</p> <p>The policy includes the additional requirement that Children under 16 years of age will not be employed to work in higher risk areas of the business (e.g., Slaughter floor, Station/Farm Hands).</p>
Procurement Guidelines	Our approach to ethical procurement practices are outlined in our Procurement Policy. Our purchasing practices are aligned with our values, including our approach to ethics, transparency, modern slavery, and indigenous procurement.

Risk assessment

Tattarang Group conducts ongoing risk assessments of all suppliers to identify modern slavery risks. This assessment looks at both the supplier's industry, geography, and product but also their supply chains and raw materials used in the production of goods and services that they provide to us. This helps us to understand not just the type of risk, but where it is likely to occur in the supply chain and what we can do about it.

We use a third-party data provider, Fair Supply Analytics, to conduct this initial risk assessment process. We then use these findings to inform where we focus our due diligence and supplier engagement, including self-assessment questionnaires, review of publicly available information, site visits and audits (detailed further below).

No specific instances of modern slavery were identified in our operations, investments or supply chains over the reporting period. However, as detailed in the case study further below, we did identify significant health and safety and labour exploitation risks to workers on a vessel docked at a berth that was controlled by one of our businesses. This example highlights the importance of considering how modern slavery and related exploitation risks appear throughout a value chain, and not just with direct suppliers.

Knowing that modern slavery risks often appear deep in a supply chain, our risk assessment framework utilises a methodology that predicts modern slavery risk up to ten tiers into the supply chain. This framework evaluates the complex interactions between the following factors:

- a. Total supplier spend amount (i.e. the value of our direct supplier contracts);
- b. Industry category, including industries that are linked to other industries further down the supply chain;
- c. Geographical area of operation; and
- d. Where the risk is occurring within the supply chain(s)- e.g., 3rd tier supplier, 5th tier supplier, etc.

Our supply chain mapping assessed modern slavery risks up to Tier 10 of Tattarang Group's supply chain. This was performed using Fair Supply Analytics' tool which links supply chain data from 190 countries, and in relation to 15,909 industry sectors and then examined against international human rights standards relating to modern slavery.¹

The tool then uses publicly available risk data to inform this analysis. The result of this process is the creation of a modern slavery risk profile to Tier 10 for Tattarang Group's suppliers and direct investments.

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

- a. Identifying and conducting due diligence on the individual suppliers, investments and industries with the most elevated risk of modern slavery;
- b. Mapping the first three tiers of Tattarang Group's supply chain and investments to identify where our biggest risks are occurring;
- c. Mapping the relative slavery risk across all of Tattarang Group's supply chains and investment portfolio up to Tier 10;
- d. Analysis of the cumulative risk of modern slavery across our supply chains and investments around the world;
- e. An overview of the classification of the first tier of our supply chain and investments by country and industry, including relative modern slavery risk.; and
- f. Assessing our exposure to specific geographic risks, including companies, products and materials that have been linked to the use of forced labour from the Xinjiang region in China.

Priority areas were identified as having an elevated risk of modern slavery. These are further detailed in the section below, "Key Risks and Our Response".

Supplier engagement, corrective action and remedy

In response to the results of our risk assessment, targeted Self-Assessment Questionnaires (SAQs) were sent out to each of those suppliers with an elevated risk of modern slavery. Their responses have been examined to assess what mitigatory steps have been taken to address exposure. Through this process we have taken steps to engage with each of those suppliers based on the level of visibility they have over their own supply chain and the steps that they are taking to address the risk of modern slavery within their supply chain.

In addition to engaging higher risk suppliers, we also see the need to raise awareness about modern slavery and our expectations with all suppliers. Our Supplier Code of Conduct clearly sets out our expectations in relation to modern slavery and we will be requiring all suppliers to acknowledge that they have read and understood this as part of our new Purchase Order System and Supplier Onboarding Process which continues to be rolled out across all business units.

¹ This Fair Supply Analytics tool uses the following sources: The United Nations' (UN) System of National Accounts; UN COMTRADE databases; Eurostat databases; The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and Numerous National Agencies including the Australian Bureau of Statistics. The tool then assesses the risks against the following international standards: The UN Guiding Principles on Business and Human Rights; The Global Slavery Index; International Labour Organisation (ILO) Global Estimates of Modern Slavery; and The United States' Reports on International Child Labour and Forced Labour.



Wouri river, Cameroon.
Photo credit: Edouard Tamba via Unsplash

Case Study: Improving procurement processes

We continue to strengthen our procurement and due diligence processes through the current reporting period. We have released procurement guidelines to help business units make conscious supply choices and continue to roll-out the purchase order system across the businesses units.

As part of this improvement, during the current reporting period we have updated the modern slavery clauses for all future procurement relationships. We will continue to roll-out the purchase order system to high-risk entities as a matter of priority ensuring that all of our suppliers will be subject to these standard provisions in the coming reporting periods.

Our supplier onboarding process has been refined and simplified to increase its practical effectiveness.

An external company was engaged during the reporting period to help improve our procurement operating model for maximum effectiveness. The recommendations, including how to address modern slavery risks, have been reviewed and will be rolled out across the business units during the next reporting period.

We are acutely aware of the limitations of the SAQ process and plan to supplement these with additional due diligence including, site visits and audits where appropriate as well as utilising worker voice tools and grievance mechanisms. During the reporting period, travel restrictions continued to limit our planned onsite audit activities. However, we were still able to engage with a leading external audit partner to complete remote audits of selected suppliers and projects. These audits were performed after the reporting period.

Training & Collaboration

We designed and launched a modern slavery Training Module for all staff, including all new starters. This helped our staff understand the risks of modern slavery, how they apply to Tattarang's supply chains, and what they should do if they identify a risk or an incident of exploitation. During the reporting period:

- Team members from the Modern Slavery Working Group met with high-risk business units to discuss the Modern Slavery Framework, our improved supplier onboarding process, and the roll out of purchase orders.
- Updates at organisation-wide 'Town Hall' meetings were conducted for the purpose of maximising awareness about our Modern Slavery Framework and the changes that we are making to improve our processes.
- Internal staff training on modern slavery issues was required to be completed by all Tattarang employees. We will be holding in-person training in the next reporting period for staff who do not have company email addresses or access to company systems.. The specifically tailored content included educational videos and quizzes.

*Tea plantation in Munnar, India
Photo credit: Ian Wagg via Unsplash*

Key risks and our response

Understanding the global prevalence of modern slavery across global supply chains, Tattarang Group assumes that modern slavery takes place within its own supply chain. Our focus, must therefore be on finding where it is taking place and addressing it.

The following priority areas were identified as having an elevated risk of modern slavery:

- **Ships and boats, including boating repair**
- **Migrant workers working in abattoirs**
- **Textiles and merchandise**
- **Investments in the solar industry**
- **Cleaning services**
- **Xingjiang Autonomous Uyghur Region (XUAR)**

Operating business / department	Risk	Description of risk and response
SFM Marine	Supply chain	<p>Our ongoing risk assessment processes identified the maintenance and repair of vessels, particularly in relation to the supply chains for marine parts, as an area of potentially elevated modern slavery risk.</p> <p>Supply chain analysis indicated that many marine parts are produced by global companies (often with Australian subsidiaries), with complex supply chains spanning numerous countries. Visibility, particularly into the deeper tiers where the manufacturing of component parts, and the base raw materials are extracted and refined, is concerningly low.</p> <p>Part of our response to this identified risk area has involved supplier engagement seeking to ascertain the visibility that our direct suppliers had into these supply chains of concern.</p>

Operating business / department	Risk	Description of risk and response
Harvest Road Group	Migrant workers working in abattoirs	<p>We understand that migrants may be more vulnerable to exploitative practices than local employees due to deceptive recruitment practices which can lead to debt bondage; their immigration status; a lack of familiarity with the language, their rights and local laws; discrimination; and families that rely on them to send wages home, increasing pressure to stay. All of these factors can make it difficult for workers to leave an abusive situation. In last year's Modern Slavery Statement, Harvest Road Beef identified the risks posed if migrant workers are not employed on the same terms as local employees and risks in the off-shore recruitment process.</p> <p>Harvest Road Group has taken a number of steps to mitigate these risks such as having a "zero fees" recruitment policy, use of a whistleblower hotline and conducting due diligence on labour hire agencies. All migrant workers employed by Harvest Road Beef are covered by the same employment arrangements as local staff. Harvest Road Group continues to review the labour and health and safety conditions of its operating entities and will implement improvements as are required and appropriate. Harvest Road Group did not recruit any additional migrant workers in the reporting period.</p> <p>Following the close of the reporting period Harvest Road Group utilized the Pacific Labour scheme for migrant workers. This scheme is heavily monitored by the Pacific Labour Facility and the Department of Foreign Affairs and Trade. Before mobilising employees into Australia under this Scheme, the participating company must demonstrate that the employees will be housed in suitable housing, have medical insurance in place, provide transport for the workers, demonstrate fees to be deducted from the employees weekly pay and have their contract of employment explained to them fully in their country of origin.</p> <p>Harvest Road Group has gone a step further by having the contract of employment translated into Bislama. All employees on arrival were given a cash advance, were supplied with a pre-paid mobile phone, given food for a week, and attended events so as to ensure any vulnerabilities the workers may have faced prior to commencement of employment with Harvest Road Group are addressed.</p> <p>In March 2021 Harvey Industries Group Pty Ltd ACN 117 597 985 (Harvey Industries Group), an entity within the Harvest Road Group had an Ethical Trade Audit. The audit included Labour Standards, Health & Safety, Environment and Business Ethics. Up to seventy employees were interviewed, chosen by the auditor, with no corrective actions raised.</p> <p>Harvey Industries Group engaged an independent third party to conduct a Labour Assessment Report, with the report issued in May 2021. The recommendations of the report will be reviewed and policies and procedures reviewed and updated as appropriate.</p>

Operating business / department	Risk	Description of risk and response
Various business units (including ZIZ, SFM Marine, Harvest Road Group)	Uniforms	<p>Many of Tattarang's business activities require our employees to wear uniforms. We recognise that the manufacture of such apparel, and related supply chains, are areas of potentially significant modern slavery risk. As a direct result of this risk identification, one of the KPIs identified in the First Statement for the reporting period for this statement was the creation of a list of preferred merchandise suppliers that have undergone our risk assessment and due diligence process.</p> <p>During the reporting period we conducted due diligence on existing garment suppliers and while no instances of modern slavery or exploitation were identified, ongoing concerns around their risk management practices remained. We are now conducting further due diligence on a number of new suppliers to ensure we identify the right suppliers to engage with who can demonstrate they are following best practice.</p> <p>We also aim to ensure our own purchasing practices do not place pressure on suppliers to exploit workers thereby increasing the risks of modern slavery occurring. We are aware that practices such as short turn-around times, inaccurate forecasts and aggressive price negotiations that don't reflect the true costs of labour can all contribute to this. Our aim in developing a list of preferred suppliers is also to develop strong relationships so that we can support our suppliers to implement best practices.</p>
Investments	Solar Energy	<p>Tattarang has an investment in a solar company that is developing one of the world's largest solar energy infrastructure networks.</p> <p>We acknowledge the potential tension in solar energy industries between the protection of human rights and the furtherance of environmental sustainability objectives.</p> <p>In view of this, Tattarang is encouraging the company to develop a solar panel procurement strategy to address modern slavery risks associated with polysilicon production (a key component of the solar supply chain).</p>

Operating business / department	Risk	Description of risk and response
Various business units (including Tattarang, SFM, Harvest Road Group)	Cleaning Services	<p>All entities within the Tattarang Group use cleaning, catering and/or security services, whether that be in office, at site, or contracted for events. Services of this nature carry a higher risk of modern slavery as they are typically characterised by a higher volume of lower skilled, lower paid and migrant labour undertaking temporary work.</p> <p>During the reporting period we engaged with a third party to perform an audit on a sample of Tattarang Group's office cleaners. The audit was concluded after the current reporting period. Any findings will be addressed in the next reporting period.</p>
Various business units - Xingjiang Autonomous Uyghur Region (XUAR)		<p>Human rights abuses allegedly experienced by Uyghur and other minority groups in the Xinjiang Autonomous Uyghur Region (XUAR) have been widely documented. Tattarang understands that there is compelling evidence that state-backed forced labour is used in factories in XUAR. The goods produced in these factories reach global supply chains and have been connected to more than 80 well-known global brands in the apparel, technology, automotive, and solar sectors.</p> <p>Walk Free, an initiative of Minderoo Foundation, a modern philanthropic organization that takes on tough persistent issues with potential to drive massive change, whose work Tattarang Group seeks to support through the delivery of strong financial returns, joined over 90 organisations in the Coalition to End Forced Labour in the Uyghur Region, which represents a united commitment by leading human rights organisations and trade unions to the welfare of the Uyghurs and other ethnic minorities in the region. The Coalition called on apparel and textile brands to end business relationships in XUAR given the grave nature of the alleged violations and the lack of any credible means to verify that forced labour wasn't used by suppliers or sub-suppliers.</p> <p>Tattarang Group agrees that businesses reporting for the Australian Modern Slavery Act should pay close attention to suppliers in the Xinjiang region. It is clear through our own efforts and consultations with experts that carrying out supply chain audits in the region are extremely difficult. To date, however we continue to actively monitor high-risk areas of our supply chain for modern slavery risks and seek advice from experts to identify suppliers who demonstrate best practices.</p>

Investments

In addition to direct investment in companies, we also have an externally managed investment portfolio.

We engaged with our externally appointed investment manager to understand what steps are being taken in relation to assessing and addressing modern slavery risks in Tattarang’s investment portfolio, including the use of screening systems to identify, on an ongoing basis, potential risk areas.

The fund manager utilises three unrelated, specialist third party providers of ESG data analysis as part of its investment screening process and applies several ‘Labour Rights’ screens to our investment portfolio.

We continue to work with our external investment manager to ensure modern slavery risks are appropriately addressed within our portfolio, and where possible, use our commercial leverage to address those risks.

We engaged with our fund manager to better understand their risk assessment and screening process across our portfolio. We also worked with them to understand the due diligence that they undertake on companies where higher risks are identified and the actions they have taken as a result. Going forward we will engage more closely with our fund manager to play an active role in this screening and decision-making process.

Next steps with screening our private equity investments for modern slavery risk

Tattarang’s internal investments team is developing an ESG Investment Framework, to comprehensively address modern slavery and other ESG issues.

The ESG Investment Framework will be approved by the Tattarang Group and operationalised by embedding it into existing due diligence processes. It will operate prior to any acquisition or investment decisions being made.

It will also provide insight into how, in the post-acquisition or post-investment phases, Tattarang can work with the investee company to address modern slavery and have greater impact.

Remediation of modern slavery risks

We did not identify any instances of modern slavery during the reporting period. However we are aware that modern slavery can be present in almost every supply chain and are committed to improving our risk identification and assessment processes.

If we identify a situation where Tattarang Group has caused, contributed or is directly linked to modern slavery, we are committed to providing remedy, or facilitating access to remedy for all those impacted.

Tattarang’s Remedy Action Plan

In our first Modern Slavery Statement, we recognised the need to develop guidelines on remedial actions relating to modern slavery. We outlined our intention to adopt a Remedial Action Plan. This occurred during the reporting period.

The Plan adopts the UNGP’s approach to determining remedial action based upon the entity’s relationship to the underlying harm – namely – whether it has caused, contributed to, or is otherwise directly linked to that harm.

Tattarang’s Remedy Action Plan compliments our Modern Slavery Policy. It is designed to provide guidance and practical steps for responding to any instances of modern slavery with which we are linked. This includes a remediation mechanism for victims.

Our Remedy Action Plan details each of the six key steps in the process following a report of harm or other suspected incident.

The Remedy Action Plan practically applies the United Nations Guiding Principles on Business and Human Rights (UNGP), particularly in relation to the need for private organisations to provide concrete remedial pathways in appropriate circumstances.

We aim to create an environment where individuals are comfortable to speak up if they suspect wrongdoing or illegal activity whether directly with their managers and/or a representative from the people and culture team or through our integrity line.



Left: Farming in Sierra Leone
Photo credit: Annie Sprattt via Unsplash



Case Study: Vessel docked at Australian Industrial Energy's Port Kembla Energy Terminal

In March 2021 a vessel that had been detained by the Australian Maritime Safety Authority (AMSA) was moved by AMSA to a mooring at Berth 101 at Port Kembla, the location of the Port Kembla Energy Terminal project owned by Australian Industrial Energy Pty Ltd ACN 624 375 417(AIE), an entity within the Tattarang Group. While AIE had no business relationship with the vessel, it collaborated with others to help safeguard the crew and improve their on-board conditions.

After the detained vessel was moved by AMSA to Berth 101 at the Terminal, Dr Forrest became aware of and was concerned by the on-board conditions for the crew. AIE and Tattarang staff engaged with AMSA, the local Vessel agent, Australian Border Force, the Seafarers' Mission, cargo owners and others in order to seek assistance for the crew. The ship had no electricity, no running water, no sanitary facilities and no ventilation. In addition, there were issues with safety equipment.

The first steps were to obtain additional diesel (for the generator) so that power could be restored to run toilets, fridges and freezers and provide other minimum systems for the operation of the vessel. Food was obtained for the crew. Efforts were made to obtain special clearances to allow the crew to go ashore and access basic services such as healthcare. Contact was made with AMSA and with the cargo owners to ascertain what the owners and managers could do to resolve the situation and provide support for the crew's welfare.

The vessel was detained by AMSA until all outstanding issues were resolved. Half of the crew asked to be repatriated. Ten (10) of the crew were repatriated and replaced with new crew members in May 2021. Ultimately AMSA issued the vessel with a 36 month ban (its longest ever ban) from visiting Australian waters. AMSA found that the ship was unseaworthy and that the living conditions on board were in breach of the Maritime Labour Convention 2006.

AMSA commented: *"Over the last few months AMSA and other parties involved in this situation, have had to drag (the owner) to the table to resolve the systemic failures on its ships. The length of the ban [of 36 months] reflects the seriousness of the operator's failures to manage the welfare of its seafarers and the standard of maintenance of its ships."*

AMSA's actions are significant because it reminds Australian businesses of the significant risks to seafarers' welfare, including risks of modern slavery and related exploitation in the shipping industry which impacts almost all global supply chains. The shipping industry is a key area of risk for modern slavery because of the considerable pressure on operators to reduce operating costs, the use of flags of convenience, the difficulty of monitoring the vessels as they move around the globe and the use of foreign crews from developing countries to crew the vessels.

Travel and border restrictions implemented in response to the pandemic have increased these risks, reducing the number of crew change-overs and limiting opportunities for crew members to go ashore to seek assistance when needed. Major steps have been taken by international maritime conventions and the work of the International Labour Organisation over the last 50 years, but much more needs to be done in the shipping industry.

Harvest Road Group

In addition to the Tattarang Group Remedy Action Plan Harvey Industries Group, an entity within the Harvest Road Group is an established business with existing remediation action plans in place

The approach to remediation within the Harvey Industries Group is defined within the Workplace Investigation Procedure. This process is applied both internally and externally across Harvey Industries Group and is designed to cover non-conformances including any serious breach of our modern slavery provisions, human rights violations or incidents of modern slavery.

In each case where a serious non-conformance incident is identified, a report is produced and shared with the relevant General Manager. No non-conformances in relation to modern slavery were reported during the reporting period.

Harvest Road Group's remediation process is supported by policies which clearly define the procedures undertaken internally to remediate harm. The Workplace Behaviour Policy outlines the expected behaviour and requirement of all staff to treat others with dignity, courtesy and respect. The Policy names unacceptable workplace conduct in line with legislation including the Australian Human Rights Commission Act.

During the reporting period we translated the Employee Grievance and Dispute Resolution Procedure into the four main languages spoken at the Harvey Industries Group processing plant. Korean, Simplified Chinese, Tagalog, and Bislama. This procedure has been sent to the employee's personal email addresses so they can read and absorb this information. We are currently developing training material on this procedure and the Whistleblower procedure which we will deliver to current employees and all new employees at induction. All translated documents are also stored on the Employee Self Service system (ESS), where the employee can access at any time.

In addition, the Whistleblower hotline is currently published across the Harvey Industries Group facility: in the employee's lunch rooms, change rooms and on the Employee Self Service portal available on the Harvey Beef intranet. We have one TV in the main canteen area, streaming current relevant information including the Whistleblower hotline in different languages. We are purchasing a further five digital screens for streaming in other areas in the plant.

Below: Harvey Beef Processing Plant in Harvey, Western Australia.



Measuring effectiveness and our future commitments (Tattarang)

SAQ Assessment

(issued to all suppliers with an elevated modern slavery risk)

SAQ's issued	17
SAQ's completed	1

Other KPIs

Meetings held with suppliers (Tattarang has engaged with suppliers throughout the reporting period, however not formally documented)	0
Site visits/audits	0
Corrective actions issued	0
Incidents raised (cases of modern slavery or indicators of related exploitation)	0
Remedy provided by Tattarang and/or suppliers	0

Our effectiveness

An important measure for transparency in our overall modern slavery response is ensuring there is continuity between reporting periods. This involves providing detailed information on those areas where we have been able to effectively implement key performance indicators, and those where this has not yet been achieved.

We concluded our first Modern Slavery Statement by outlining a detailed roadmap of key areas for improvement to be implemented during this reporting period (and subsequently).

The following tables set out each of the Actions and Improvement Initiatives detailed in our first Statement and provides a snapshot of the areas where we have met our target objectives, and those where there is still room for improvement.

Tattarang's progress snapshot of key improvement areas identified in the first Statement:

Completed

In-progress

Area Of Focus	Improvement Initiative	Planned Action for this Reporting Period (FY21)	Progress
Governance 	Strengthen policies and review contract templates to accord with our modern slavery risk framework.	Adopt and implement updated Supplier Code of Conduct and procurement guidelines.	
		Roll out purchase order standard terms and conditions that include clauses on modern slavery.	Standard purchase order terms and conditions have been finalised. We continue to roll out across the Group.
		Update and standardise contract templates used by our businesses.	
		Implement Responsible Investment Principles with specific metrics on modern slavery.	A working Group has been established to ensure that an ESG Framework (which will replace the Responsible Investment Principles) is prepared and rolled out across the Group.
		Establish centralised intranet portal to house all relevant policies.	
	Steering Group to increase engagement with each of the operating businesses to understand their future activities and associated risks.	Modern Slavery Steering Group to facilitate meetings with high risk operating businesses and establish a feedback mechanism where businesses regularly feed into the Steering Group.	



Area Of Focus	Improvement Initiative	Planned Action for this Reporting Period (FY21)	Progress
Risk Assessment 	Conduct deeper due diligence on medium high-risk suppliers.	Review SAQs and verify responses for all medium high- risk / high-spend suppliers. Circumstances permitting, carry out on-site audits on three high risk/high-spend suppliers.	We identified suppliers and engaged auditors; however, the audits were not completed until just after the reporting period.
	Improve supplier onboarding, risk screening and verification process.	Select third party software to analyze risk throughout our supply chain and assist with verification of information provided by suppliers.	
		Roll out new purchase order system across high risk Tattarang businesses.	Purchase Order systems continue to be rolled out across high risk Tattarang businesses
		In-person training for supplier on-boarding for specialist staff (procurement, legal, people and culture, central operations).	Significant progress made. Will continue to train the necessary specialists in FY22 reporting period.



Area Of Focus	Improvement Initiative	Planned Action for this Reporting Period (FY21)	Progress
Supplier Engagement, Corrective Action & Remedy 	Improve identification of incidents.	Increase our visibility of incidents by ensuring key medium and high-risk suppliers have an effective grievance mechanism and encourage them to report all incidents to us.	
	Improve identification of corrective action and remedy.	Conduct site visits and/or audits on three high risk/high-spend suppliers. Explore alternatives to in- person audits to navigate COVID-19 restrictions and utilise technologies that better reflect worker voice and empowerment.	We were unable to have audits successfully completed in the reporting period. We did select a firm to perform the audit and scheduled them after the reporting period. This was due to supply constraints.
	Review purchasing practices and business KPIs to assess "red flags" and impact on modern slavery risk (including turnaround time, pricing and sourcing of raw materials).	Identify types of purchases where "rush orders" are common (quick turnaround time or limited due diligence conducted), including, for example, purchase of merchandise or in response to emergencies. Where possible, build a list of preferred suppliers in these areas to reduce risk, including, for example, preferred hotels or merchandise suppliers.	Preferred supplier list will be made available during the FY22 reporting period
	Ensure a victim centred approach when responding to instances of exploitation or modern slavery.	Assess both our and our suppliers' response to any identified incidents of exploitation.	
Training & Collaboration 	Roll-out compulsory training on modern slavery for all staff.	Modern Slavery training module completed by all staff, and included in onboarding process for new starters.	Training rolled out to all staff in current reporting period. Continue to work with staff to ensure 100% completion

Tattarang's focus areas for the next reporting period:

Area Of Focus	Improvement	FY21-22	FY22-23
Governance 	Embed policies and contract templates throughout the business.	All business unit leaders aware of suite of policies and using relevant modern slavery contractual provisions.	Review all policies relating to modern slavery to identify if any need to be strengthened
		Embed ESG Investment Framework throughout Tattarang.	
		Recruitment of dedicated Responsible Investment Lead (ESG) resource	
		Continue to roll out purchase order system (including modern slavery T&Cs) across high-risk business units.	
	Strengthen Board oversight of modern slavery risk management.	Update and report on modern slavery KPIs, relevant to Tattarang business units, as part of the regular Board meetings.	Based on Board feedback, identify improvements to risk management strategy and reporting.
	Steering Group to increase engagement with each of the Tattarang business units to understand their future activities and associated risks.	Continuous engagement with business units to better understand their future activities and associated risks.	
	Conduct deeper due diligence on medium and high-risk suppliers.	Identify priority actions for our high risk/high spend suppliers to implement and continue to develop relationships.	

Area Of Focus	Improvement	FY21-22	FY22-23	
Risk Assessment 	Improve supplier onboarding, risk screening and verification process.	Continue risk assessment of all suppliers using third party tool, taking appropriate action for high-risk parties prior to onboarding.	Continue to improve onboarding, risk assessment and verification process.	
		Improve identification of incidents.	Work with key high-risk suppliers to ensure they have an effective grievance mechanism.	All high-risk/high-spend suppliers have provided details of their grievance mechanisms.
			Publishing the Whistleblower integrity line on the Tattarang website, to allow third parties to report any incident of modern slavery.	
	Improve identification of corrective action and remedy.	Identify any incidents of modern slavery or related exploitation using a combination of audits/ site visits and relying on contractual provisions requiring key suppliers to report incidents to us.	All high-risk/high spend suppliers report regularly on incidents identified with tailored training (online workshops) on remediation held with long-term suppliers.	

Area Of Focus	Improvement	FY21-22	FY22-23
Supplier Engagement, Corrective Action & Remedy 	Review purchasing practices and business KPIs to assess “red flags” and impact on modern slavery risk (including turnaround time, pricing and sourcing of raw materials).	Implement changes to purchasing practices to reduce risk.	Continue to identify “red flags” in relation to purchasing practices and reduce risks.
	Ensure a victim- centered approach when responding to instances of exploitation or modern slavery.	Ensure Remedy Action Plan is followed, with particular focus on ensuring victims are protected, consulted and involved in decision-making.	Continue to ensure victims are consulted and involved in decision-making when taking corrective action or providing remedy.
Training & Collaboration 	Roll-out of compulsory training on modern slavery for all staff.	Continue to improve training based on staff feedback/ test results.	Continue to improve training based on staff feedback/ test results. Include any new geographical/sector-focused risks.
	Supplier training.	Develop online training for high risk/high value suppliers.	Roll out online training to high risk/high value suppliers. Identify key areas where suppliers need further support to manage modern slavery risks.

Measuring effectiveness and our future commitments (Harvest Road Group)

SAQ Assessment
(issued to all suppliers with an elevated modern slavery risk)

SAQ's issued 73

SAQ's completed 10

Other KPIs

Meetings held with suppliers 0

Site visits/audits 0

Corrective actions issued 0

Incidents raised 0
(cases of modern slavery or indicators of related exploitation)

Remedy provided by Harvest Road Group and/or suppliers 0

Our effectiveness

An important measure for transparency in our overall modern slavery response is ensuring there is continuity between reporting periods. This involves providing detailed information on those areas where we have been able to effectively implement key performance indicators, and those where this has not yet been achieved.

We concluded our first Modern Slavery Statement by outlining a detailed roadmap of key areas for improvement to be implemented during this reporting period (and subsequently).

The following tables set out each of the Actions and Improvement Initiatives detailed in our first Statement and provides a snapshot of the areas where we have met our target objectives, and those where there is still room for improvement.

Harvest Road Group’s progress snapshot of key improvement areas identified in the first Statement:



Area Of Focus	Improvement Initiative	Planned Action for this Reporting Period (FY21)	Progress
Governance 	Strengthen policies and review contract templates relating to modern slavery.	Ensure the Harvey Industries Group Code of Conduct is adopted by and implemented across all Harvest Road Group entities.	
		Ensure all suppliers are provided with and acknowledge our Supplier Code of Conduct as part of their onboarding.	All suppliers have not been provided with the Supplier Code of Conduct.
		Ensure all employees and contractors provided with the Code of Conduct before commencing any work.	All employees are provided with the code of conduct before commencing. We will continue to work with contractors, in the FY22 reporting period to ensure that they also receive a copy of the code of conduct.
	Steering Group to increase engagement with each of the operating businesses to understand their future activities and associated risks.	Modern Slavery Steering Group to facilitate meetings with high risk operating businesses and establish a feedback mechanism where businesses regularly feed into the Steering Group.	

Area Of Focus	Improvement Initiative	Planned Action for this Reporting Period (FY21)	Progress
Risk Assessment 	Conduct deeper due diligence on medium high-risk suppliers.	Review SAQs and verify responses for all medium high-risk / high-spend suppliers.	
		Circumstances permitting, carry out on-site audits on two high risk/ high-spend suppliers.	Audits have been booked but not completed during the reporting period.
	Conduct deeper due diligence on high-risk suppliers.	Review SAQs and verify responses for all high-risk / high-spend suppliers.	
		Continue third-party audits for Offshore Labour Hire agencies.	No third party offshore hire agencies were used during the reporting period.
		Document interviews with Offshore Labour Hire candidates e.g. manually or through the payroll system.	No offshore labour candidates were interviewed during the reporting period.
	Improve supplier onboarding, risk screening and verification process.	Select third party software to analyse risk throughout our supply chain and assist with verification of information provided by suppliers. In-person training for supplier on-boarding for specialist staff (procurement, legal, people and culture, central operations).	



Area Of Focus	Improvement Initiative	Planned Action for this Reporting Period (FY21)	Progress
Supplier Engagement, Corrective Action & Remedy 	Improve identification of corrective action and remedy.	Conduct site visits and/or audits on two of high risk/high-spend suppliers.	Audits have been booked but not completed during the reporting period.
		Explore alternatives to in-person audits to navigate COVID-19 restrictions and utilise technologies that better reflect worker voice and empowerment.	
Training & Collaboration 	Roll-out compulsory training on modern slavery for key staff.	Modern Slavery training module completed by key staff, and included in onboarding process for starters in supply chain roles.	

Harvest Road Group's area's of focus for the next reporting period:

Area Of Focus	Improvement	FY21-22	FY22-23
Governance 	Strengthen policies and review contract templates relating to modern slavery.	Identify areas for further improvement in our policies and contracts.	Review all policies relating to modern slavery to identify if any need to be strengthened.
		Complete a review of the Tattarang Group policy framework, identify those policies applicable to Harvest Road, which are not already addressed by the Harvest Road Group Policy suite and adapt and implement as appropriate.	
		Harvest Road to issue its own Modern Slavery Statement.	
	Steering Group to increase engagement with each of the operating businesses to understand their future activities and associated risks.	Continuous engagement with operating businesses to better understand their future activities and associated risks.	
Risk Assessment 	Conduct deeper due diligence on medium high-risk suppliers.	Identify priority actions for our high risk/high spend suppliers to implement and continue to develop relationships.	
		Expand due diligence to Tier 2 of supply chain.	
	Conduct deeper due diligence on high-risk suppliers.	Identify priority actions for high risk/high spend suppliers to implement and continue to develop relationships.	
	Improve supplier onboarding, risk screening and verification process.	Identify ways to improve our risk screening and supplier assessment processes.	Continue to improve onboarding, risk assessment and verification process.
		Roll out new purchase order system.	

Area Of Focus	Improvement	FY21-22	FY22-23
Supplier Engagement, Corrective Action & Remedy 	Improve identification of corrective action and remedy.	Conduct audits on a selection of our Tier 2 suppliers. Based on recommendations, adopt hybrid model to audits, including role of worker voice.	All high-risk/high spend suppliers report regularly on incidents identified with tailored training (online workshops) on remediation held with long-term suppliers.
Training & Collaboration 	Roll-out compulsory training on modern slavery for all staff.	Continue to improve training based on staff feedback / test results. Develop annual training refresher courses tailored to specific staff (e.g. people and culture, procurement, senior management).	Continue to improve training based on staff feedback/ test results. Include any new geographical/sector-focused risks.

Consultation with all reporting entities and entities owned/controlled by reporting entities

These boards have been assisted by the work of the senior leaders and staff, and the relevant central operations functions, including the finance, people & culture, communications, and legal teams. These functions were consulted to understand each business' approach to assessing, addressing and remediating modern slavery risks. Members of Harvest Road Group Pty Ltd, Tattarang Pty Ltd as trustee for The Peepingee Trust, Tattarang Capital Pty Ltd and NEGU Pty Ltd leadership teams participated in the preparation of this statement.

This joint statement was approved by the boards of each of the four reporting entities covered by this statement. The board of Harvest Road Group Pty Ltd approved this statement on 29 December 2021, and the boards of Tattarang Pty Ltd as trustee for The Peepingee Trust, Tattarang Capital Pty Ltd and NEGU Pty Ltd have approved this statement on 30 December 2021.

This statement is signed by a director of each of Tattarang Pty Ltd as trustee for The Peepingee Trust, Harvest Road Group Pty Ltd, Tattarang Capital Pty Ltd and NEGU Pty Ltd pursuant to section 14(2)(e)(i) of the Modern Slavery Act.

