

# Craig Mostyn Group

## Modern Slavery Statement

### FY 2021



## MODERN SLAVERY

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Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This year has been an important one in the global fight against Modern Slavery, the Australian Government introduced legislation enacting the Act. The Act establishes a Modern Slavery Reporting Requirement on entities who operate in Australia with annual consolidated revenues of A\$100 million or more. Statements provide information on the risk of Modern Slavery practices in the operations and supply chains and describe the actions taken to address these risks.



Reporting entities are required to publish annual Modern Slavery Statements detailing their actions to address Modern Slavery. This will increase business awareness of Modern Slavery, reduce Modern Slavery risks in Australian goods and services, and drive a business 'race to the top' to improve workplace standards and practices.

## INTRODUCTION

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Modern Slavery is an emerging global issue that businesses need to be alert to and prepared to address. This policy applies to Craig Mostyn Holdings Pty Ltd and each of its related entities (together, **Craig Mostyn**), including all Board members and employees of Craig Mostyn. Craig Mostyn expects that our employees and suppliers will reject Modern Slavery.

The challenge of ensuring we avoid any involvement in Modern Slavery is significant,

but we are committed to continuing to evolve our approach to meet developing risks. This statement, which meets the requirements of the Commonwealth Modern Slavery Act (the **Act**), describes the steps taken by Craig Mostyn to ensure that Modern Slavery is not occurring in any part of our business or in any of our supply chains. In line with the Australian Government's guidance, Craig Mostyn has produced one statement for our group covering all entities.



## OUR STRUCTURE, BUSINESS AND SUPPLY CHAINS

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Craig Mostyn is a large Australian food and agribusiness with over 500 employees spread across four different businesses and 11 locations around Australia (7 in WA, 3 in VIC & 1 In TAS). The Group services customers and suppliers both domestically and overseas. Our [website](#) provides additional information on our key products and services.



Craig Mostyn's Procurement Manager manages the majority of our supplier relationships working with over 300 suppliers

across Australia, South Africa, South Korea, Peru, Norway and more. Where possible, Craig Mostyn buys goods and services locally to cover the agribusiness life cycle, including items such as stock, feed, personal protective equipment (PPE), packaging and chemicals.

We have consulted and engaged with the leadership and key personnel in all of the companies we own or control in the development of this statement, gaining their input into the development of the statement and identifying any potential risks within their divisions.

*“Craig Mostyn works with its stakeholders to identify and understand the impacts of its activities”*

## RISK ASSESSMENT AND MITIGATION

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Our businesses have different Modern Slavery risks depending on various factors, including the mode of labour regularly employed, specific type of industry and geographical location. When a human rights incident occurs, we seek to mitigate the situation as appropriate based on our policies and standards, this may include remediation based on our involvement.

Craig Mostyn works with its stakeholders to identify and understand the impacts of its activities, so that benefits can be optimised and negative impacts limited. Due diligence is implemented to prevent and mitigate adverse impacts and Craig Mostyn provides access to remedy through effective grievance mechanisms.



## ACTIONS TAKEN

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Craig Mostyn's Modern Slavery Policy outlines the Minimum Standards that our suppliers should comply with. The Policy encourages suppliers to exceed these standards and promotes best practice and continuous improvement in our operational and supplier contract terms.

### **Supplier monitoring**

Suppliers are monitored for compliance against our Minimum Standards through our supplier assessment processes.

Craig Mostyn uses a risk matrix to assess suppliers at a high-level, aimed at identifying potential sources of Modern Slavery. The matrix uses known leading risk factors such as product type, country and industry. The risk matrix also employs reports from global organisations that exist to protect against circumstances that propagate Modern Slavery; such as removal or reduction of political rights, civil liberties and transparency in government.

For suppliers scoring high on this matrix we issue a questionnaire, aimed at determining the next course of action, which may result in the supplier requiring an audit. Craig Mostyn utilises Centrl's MSA360 Modern Slavery Compliance Act platform to enable it to manage and track its suppliers.

This in-depth audit requires a Craig Mostyn auditor or third party to answer very specific questions around Modern Slavery.

In the last Financial Year 265 suppliers were surveyed. Of those that responded; 13 were scored as a low risk; 70 were scored as a medium risk, mainly requiring implementation of MSA policies; and 2 were scored as high risk. On detailed investigation, both of these were resolved.

171 did not return a survey, despite multiple requests. Of these, 36 were found to publish Modern Slavery Statements and Policies on their websites. The remaining 135 have been subsequently escalated to the contract owners within the Craig Mostyn business units to follow up through FY22.

### **Training**

We cannot expect to prevent Modern Slavery and other human rights issues in our business and supply chains unless we help our employees, suppliers and other business partners spot, report and address them. Craig Mostyn continues to be proactive on signalling procurement specialists who require training on identifying Modern Slavery within our supply chains. We extended this training out to key employees and management to help them better understand, identify and report Modern Slavery incidents as well as providing multiple levels of accountability. We continue to provide specialist support to due diligence teams on identifying human rights concerns.

We will be rolling out a new Learning Management System through CY22 across all group operations enabling us to effectively deploy Modern Slavery awareness training through the entire organisation.

### **Whistle-blower**

Craig Mostyn has a number of mechanisms for employees and third parties to anonymously report suspected or actual illegal activity or breaches of Craig Mostyn Policies, including the Code of Conduct. Employees and third parties are able to access an externally operated whistle-blower system by phone, post or email. Each whistle-blower disclosure received is investigated and reported to the Chair of the Audit & Risk Management Committee. Craig Mostyn's grievance procedure ensures all grievances are managed in a systematic, fair, timely and transparent manner.

## ASSESSMENT AND EFFECTIVENESS

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Several of our processes, including our grievance processes, help track our performance.

We are not aware of, and have not received any, Modern Slavery complaints during 2021 through either our site level grievance processes or our whistle-blower reporting.

We will consider key performance indicators (KPIs) to help track the effectiveness of actions to prevent and address Modern Slavery. Conversely, we are not aware of any KPIs for our operations which would incentivise or facilitate Modern Slavery.

## LOOKING AHEAD

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We will continue to embed the prevention of Modern Slavery into operational as well as our supplier driven processes. We will continue to develop our processes and practices to address this challenging and complex issue.

In addition we continually aim to:

- raise awareness among our suppliers;
- continue to review our risk assessment and mitigation measures with respect to Modern Slavery; and
- explore ways to better identify and act on risks further up our supply chains.

**Patrick Walsh**  
**Chief Executive Officer**

*This statement was approved by the Craig Mostyn Board on 18<sup>th</sup> November 2021.*