

# MODERN SLAVERY COMPLIANCE STATEMENT

MODERN SLAVERY ACT 2018

## REPORTING ENTITY

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This statement includes all entities in the Throsby Group of companies which are required to report under the Modern Slavery Act 2018. This statement is for the reporting period ending 30 June 2023.

## STRUCTURE

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The parent company is known as Usinch1 Pty Limited ACN 634 587 143. Usinch Pty Limited ACN 060 571 673 is a controlled entity of Usinch1 Pty Limited which trades as E C Throsby and is known as ECT. Usinch1 Pty Limited and Usinch Pty Limited are both Australian owned private companies.

For the purpose of this statement the group of Throsby Group of Companies will be known as ECT. The group of companies employed approximately 500 employees as at 30 June 2023

ECT acknowledges that other related and associated entities are not part of the consolidated group and not required to report under the act, however, is committed to ensure that modern slavery does not occur within any related or associated entities or their respective supply chains.

The registered office of the companies is 755 Hunter Street, Newcastle West NSW 2302.

## OPERATIONS

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The Throsby Group groups operations are primarily centred around the following activities:

- Beef Processing Facility located at Whittingham, NSW
- Beef Processing Facility located at Young, NSW
- Various cattle stations located in both Queensland and New South Wales

## MANAGEMENT TEAM

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The activities of the group are primarily controlled by a senior management team comprised of the following positions. These staff are predominately responsible for application of actions outlined in the statement:

### Directors

- Managing Director

### Senior Leadership Team

- Chief Executive Officer

- Chief Financial Officer
- Group Manager Operations
- Group Manager People and Safety
- Group Manager Maintenance
- Group Manager IT
- General Manager (Young Plant)

## Management

- Sales Manager
- Logistics and Export Manager
- Production Manager(s)
- Sales and Logistics Manager
- Livestock and Transport Manager
- Quality Assurance Manager(s)
- Maintenance Manager(s)
- Farm Manager(s)

## SUPPLY CHAINS

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Livestock are predominately sourced from the mainland states of the Australian east coast. They are procured on the following basis:

- Saleyard Markets (Auctions) – via Livestock Agents
- Consignment (Over the Hook) – Farmer Direct and via Livestock Agents
- Paddock Purchases (Liveweight) – Farmer Direct and via Livestock Agents

Packaging materials and other supplies are generally purchased on a direct basis from Australian manufacturers when possible.

## RISK OF MODERN SLAVERY PRACTICES

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The industry within which ECT operates is food manufacturing (meat processing) and the agricultural industries. The supply chains for these industries are predominately associated with the agricultural sector but also manufacturers of packaging materials and other consumables.

ECT acknowledges the potential for modern slavery risks within the industry that it operates and its associated supply chains which are predominately:

- Slavery
- Forced and bonded labour
- Human Trafficking

Indicators of the industry risks include:

- Use of unskilled, temporary or seasonal labour
- Use of short-term contracts and outsourcing
- Use of foreign workers or temporary or unskilled labour
- Recruitment strategies by suppliers, their agents or labour hire agencies targeting employees from marginalised or disadvantaged communities

## ACTIONS TAKEN TO ADDRESS THOSE RISKS

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ECT has the following written policies which outline policies and procedures associated with the recruitment and management of staff:

- Recruitment Policy
- Human Rights Policy
- Whistleblower Policy
- Diversity and Inclusion Policy
- Grievance Handling Policy
- SHEQ Policy
- Farm Safety Policy
- Discipline Procedure
- Consultation and Communication Procedure

ECT also acknowledges that it has responsibilities including but not limited to:

- Labour Enterprise Agreements
- Industrial Awards
- Fair Work Act 2009

ECT has educated all relevant staff of the company's requirements with regard to modern slavery compliance.

ECT has undertaken an internal review of its own operations and supplier base to assess the likelihood of modern slavery risks within its business and supply chains.

ECT staff performs site visits from time to time of major suppliers. It will also require evidence and/or assurance that suppliers are not engaged in modern slavery practices at the time of tendering and contract negotiations.

ECT has made a commitment that in the event that modern slavery in any form is identified it will require any issues to be remediated. In the event that issues are not remediated to ECT's satisfaction it will terminate the business relationship.

## ASSESS THE EFFECTIVENESS OF ACTIONS

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ECT will continually monitors its progress of the above actions in order to assess the performance of the program. ECT is committed to a continuous program to ensure that it is meeting its obligations under the act as it continues to increase its understanding of modern slavery.

## PROCESS OF CONSULTATION WITH OTHER ENTITIES

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All entities included under the Throsby Group have common management and control. For the purpose of the policies, procedures and actions associated with Modern Slavery all entities are treated as a single business in a unified manner.

## FUTURE DEVELOPMENTS

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ECT aim to continue to revise and develop our approach to modern slavery compliance.

This will include:

- Additional Policy and Procedure development
- Review of existing Policies and Procedures as part of our regular Management Review; and
- Development and Implementation of Awareness Programs
- Introduction of further assessment methods of supply chain risk

## OTHER INFORMATION

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ECT does not tolerate slavery in any form and is committed to ensuring that it does not occur within its own business or within its supply chains.

## APPROVAL

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This statement was approved by Edward Throsby the Sole Director of each of the reporting entities covered by this statement.



Edward Throsby  
Sole Director  
Usinch1 Pty Limited  
Usinch Pty Limited  
12th December 2023