



# **Greenmountain Food Processing Pty Ltd**

## **Modern Slavery Statement**

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# 1. Our Business

## 1.1 Introduction

Greenmountain Food Processing are a specialist Beef and Veal manufacturer.

Across our operations, we aim to ensure that both we and our business partners operate with the highest respect for human rights. We are committed to operating our business lawfully and ethically and engaging like-minded partners and suppliers that are aligned to our values. We hold a high standard for our suppliers to operate in accordance with the applicable modern slavery laws, which prohibit human slavery and related practices, forced labour, human trafficking and child labour.

We value and observe all laws regarding corporate social responsibility, environmental and workplace protection and staff inclusion and diversity.

## 1.2 Our Governance Framework

We are committed to excellence in corporate governance, transparency and accountability, which we consider essential for long term performance and sustainability and to protect the interests of our stakeholders and clients. Our values are set out in our Code of Conduct, which sets the behavioural standards for everyone who works for Greenmountain Food Processing.

### Values

- Quality
- Customer Satisfaction
- Integrity
- Sustainability
- Safety
- Communication
- Teamwork
- Achievement

### Code of Conduct

Our Code of Conduct is linked to our values and explains what we stand for as an organisation and how we conduct ourselves as we work together to deliver our strategy. It represents the global approach we take to important ethical and compliance issues and embodies our commitment to good corporate governance and responsible business practice. Our Code covers a key elements about how we do business and deliver our services, including lawful and ethical behaviour. It also outlines the various channels for raising concerns, including whistleblowing. Our executive leadership team is deeply committed to our Code.



## **2. Structure, Operations and Supply Chains**

### **2.1 Structure**

Our central operations are based in Coominya, Queensland, with a sales and accounts Head Office in Kyogle, New South Wales. Accountability for addressing modern slavery and human rights risk is cross-functional and our internal business units cooperate to mitigate the risks arising out of this complex issue. Our Production, Procurement, Quality Assurance, and Risk and Compliance departments work together in conjunction with senior management to develop and implement modern slavery initiatives and ensure that our on-the-ground business units are using materials sourced from only the most ethical suppliers.

### **2.2. Operations**

Greenmountain specialises in growing and sourcing naturally bred, naturally fed beef and veal to be processed at our modern export food processing establishment at Coominya in the Somerset Region of south-east Queensland. Greenmountain distributes to discerning wholesale and retail customers both domestically and in export markets globally.

### **2.3. Supply Chains**

Greenmountain Food Processing does not manufacture the materials it uses for its service delivery. In FY20/21, we engaged directly with multiple suppliers, from a number of countries. In addition, our suppliers have suppliers of their own.

Most of our procurement costs are with suppliers based in low-risk countries, as defined by the OECD. All of our suppliers have Australian-based subsidiaries that we deal with directly. Consequently, the entirety of our direct procurement spend is within Australia.

Our largest procurement spending category is on packaging goods; plastics and cardboard. These items and materials are used for the packaging of our finished product.

## **3. Due Diligence and Remediation**

### **3.1 Supplier Governance Framework**

To help us make informed purchasing decisions, we are establishing a Supplier Governance Framework which provides a framework against which we can assess suppliers. We consider labour practices, environmental risks, health and safety and bribery and corruption to be key risk areas. We assess these risks as part of our selection and contract renewal process using a combination of survey/questionnaires and documentary review.

We endeavour to work with our suppliers to assess whether they meet our standards.

### **3.2 Supplier Standards**

We screen suppliers according to the following criteria:



**Compliance with laws** – suppliers must comply with the laws of the countries in which they operate.

**Labour and human rights** – suppliers must respect and support the protection of human rights of workers, individuals and communities affected by their activities.

**Non-discrimination** – suppliers must not engage in or support discrimination in hiring and employment practices, including on grounds of gender, age, race, ethnicity, cultural background, disability, physical features, marital status, pregnancy, family responsibilities, political belief, industrial activity, union membership or irrelevant criminal record.

**Bullying, Harassment and Disciplinary Practices** – suppliers must not use violence or threats of violence or other forms of physical coercion or harassment, corporal punishment, mental, physical or verbal abuse, sexual harassment or harsh or inhumane treatment.

**Freedom of Association** – Suppliers must respect workers' freedom of association, recognise and protect their right to collective bargaining and to form, join and administer workers' organisations.

**Wages and benefits** – Suppliers must comply with applicable laws relating to wages and benefits (including minimum wages, overtime pay, and piece rates). Suppliers must not use deductions from wages as a disciplinary measure and must pay workers in a timely manner.

**Working Hours** – Suppliers must not require workers to exceed prevailing local work hours. Also, in line with International Labour Organisation (ILO) standards, workers shall not be required to work more than 60 hours per week (including overtime), except in extraordinary business circumstances with their consent. Employees should be allowed at least one day off per seven-day week.

**Forced and Compulsory Labour** – Suppliers must not use any form of forced, bonded, compulsory labour, slavery or human trafficking. Suppliers must not require workers to surrender any government issued identification, passport or work permit or other personal document as a condition of employment. Workers shall not be required to pay employers' or agents' recruitment or any other fee for their employment.

**Child and underage labour** – suppliers must not employ children under the minimum age for employment in the country in which they operate. If the minimum age of employment in that country is less than 15 years, Greenmountain Food Processing will reconsider engaging that supplier. Suppliers must not employ children under the age of 18 for any hazardous work or work that is inconsistent with their individual development.

**Health and Safety** – Suppliers must identify and comply with relevant workplace and product health and safety laws and ensure their workers understand and follow health and safety policies, standards and procedures that apply to their work.

**Environmental laws, permits and reporting** – Suppliers must comply with applicable environmental laws, standards and notices from regulators. Suppliers must obtain, maintain, keep current and comply with necessary environmental permits, approvals and registrations.

**Business integrity** – Suppliers must comply with applicable anti-bribery and anti-corruption laws and are expected to exercise due diligence to reasonably assure that the raw materials in the products it manufactures do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuse.

**Trade Controls** – Suppliers must comply with all applicable laws and regulations relating to sanctions, export, re-export, import and trade controls.

### **3.3 Remediation**

Where problems are identified with suppliers we have engaged, we request the remediation measures and corrective that they are implementing or have implemented and the expected timeframes for remediation to ensure that they continue to meet our supplier standards.

We also consider the sustainability risks arising out of supplier engagement. Common areas of concern include working hours and health and safety. While these areas may not in themselves constitute modern slavery, they are inconsistent with our expectations and human rights standards.

## **4. Risk Assessment and Mitigation**

### **4.1 Supplier Risk Categories**

Greenmountain Food Processing assesses its supplier risks according to the following categories:

- Operational;
- Commercial;
- Business continuity;
- Fraud;
- Information security;
- Health and safety;
- Privacy;
- Anti-bribery;
- Anti-corruption;
- Trade sanctions;
- Export controls;
- Labour practices; and
- Environmental practices.

### **4.2 Risk Indicators**

We are aware that certain sectors and industries carry higher modern slavery risks than others due to their characteristics and products. We look for the following risk indicators when assessing the risk of modern slavery within our supply chain.



Sector and Industry	<ul style="list-style-type: none"> <li>• Characteristics</li> <li>• Products</li> <li>• Processes</li> <li>• Recruitment practices</li> <li>• Labour standards</li> </ul>
Product and Services	<ul style="list-style-type: none"> <li>• Cost requirements</li> <li>• Delivery timeframes</li> <li>• Reporting</li> <li>• Raw materials used</li> </ul>
Geographic Risks	<ul style="list-style-type: none"> <li>• Governance in region/country</li> <li>• Labour rights framework</li> <li>• Human rights framework</li> <li>• Rule of law</li> </ul>
Entity Risks	<ul style="list-style-type: none"> <li>• Management of procurement/sourcing processes</li> <li>• Reputation</li> <li>• Recruitment practices</li> </ul>

## 4.3 Mitigation

We work with our suppliers to assess whether they meet our standards and seek to ensure they have their own processes in place for managing their own risks. We only work with those that are willing to work with us to meet our minimum standards for compliance.

Where we identify concerns about our supplier performance, we engage with them in constructive dialogue and seek remediation of any non-compliance.

If suppliers are unable or unwilling to engage with us to establish that they have appropriate risk management controls in place, we may either engage with their senior management to better understand their ethical framework or suspend their services.

## 5. Measuring Effectiveness

### 5.1 Reporting and Performance Indicators

We monitor, manage and report progress on a range of indicators used to assess the effectiveness of our responsible business programs and performance. We recognize that our choices in the materials we use influence and impact both our own operations and beyond. We are establishing performance indicators that extend along our supply chain.

### 5.2 Future Commitment

In the upcoming months, we will be focused on continuing to develop and mature our supplier due diligence programs and assessing our practices against the requirements of the *Modern Slavery Act 2018* (Cth).

## 6. Stakeholder Engagement and Collaboration

We engage with industry bodies to stay up to date with the highest industry standards regarding sourcing products and materials. We collaborate and network with our peers to ensure that we source products that are made ethically and are ever alert to events occurring in the supplier landscape, including where they relate to disclosure of human rights abuses.

## 7. Training and Capacity Building

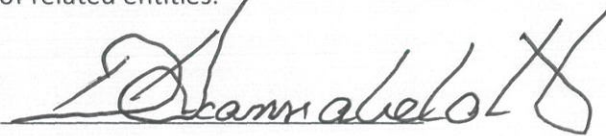
Our compliance training is aligned with our Code of Conduct, which outlines our values and our commitment to human rights and business integrity in all areas and how we will conduct ourselves when we work together to deliver our objectives. Our compliance training covers obligations on issues such as health, safety, wellbeing, the environment, discrimination and bullying, accessibility, diversity and inclusion and corporate governance, which align with basic human rights as recognised internationally.

We monitor, report and manage mandatory training for all employees. We are in the process of tailoring our training to encompass key principles on making better purchasing and procurement decisions. The training will outline human rights risks, including those relating to modern slavery within supply chains.

The training will also provide an overview about our responsibilities and the tools, resources and above strategies to manage supplier risk. All employees engaged in procurement and supplier engagement have access to this Modern Slavery Statement. However, our training will crystallise these principles to ensure consistent application within our organisation.

## 8. Declaration

This statement was approved by the Sole director of Greenmountain Group ABN: 29 123 040 424 and all of related entities.

Signed: 

David Scarrabelotti

Sole Director

Greenmountain Group

14/10/2024