

Modern Slavery Statement

1. Overview

This Modern Slavery Statement Describes the steps taken by the John Dee Group and our associated entities during the Australian Financial Year ending June 2024 to address modern slavery risks to our business and supply chains.

2. Identification of reporting entity

The John Dee Group consists of multiple entities, including:

- John Dee Warwick Pty Ltd - ACN 009 663 496
- John Dee (Export) Pty Ltd - ACN 009 723 997
- Tinaroo Pty Ltd - ACN 008 578 854
- Wadmin Pty Ltd - ACN 065 290 333
- ST Wallace Pty Ltd - ACN 010 071 164
- Freestone Farms Pty Ltd - ACN 010 259 042
- Southern Downs Grazing Pty Ltd - ACN 010 388 324
- Farm and Coastal Holdings Pty Ltd - ACN 004 511 586
- Hart Holdings Pty Ltd - ACN 008 612 422
- Southern Cross Meat Packers Pty Ltd - ACN 008 643 534
- Ausmanteck Pty Ltd - ACN 008 634 642
- Henrietta Downs Pty Ltd - ACN 009 685 803

3. Description of structure, operations and supply chains of the reporting entity

John Dee is a group of companies engaged in the processing, trading, logistics and toll processing of beef cattle and subsequent end and by-products. A breakdown of the group is as follows:

- John Dee Warwick Pty Ltd is an operational company that processes and trades products derived from Beef cattle.
- Tinaroo Pty Ltd is a payroll company for administrative employees of the John Dee Group.
- Wadmin Pty Ltd is a payroll company for production employees of the John Dee Group.



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- ST Wallace Pty Ltd is a payroll company for maintenance employees of the John Dee Group
- Freestone Farms Pty Ltd is responsible for cattle grazing and farming operations for the John Dee Group.
- Southern Downs Grazing Pty Ltd engages in cattle trading including the purchase and sale to John Dee Warwick Pty Ltd.
- Farm and Coastal Holdings Pty Ltd provides transport services for John Dee Warwick Pty Ltd.
- Hart Holdings Pty Ltd is the primary reporting entity of the John Dee Group
- Southern Cross Meat Packers Pty Ltd engages in the purchase and sale of export John Dee Beef.
- Ausmantek Pty Ltd is a land holding company for the John Dee Group.
- Henrietta Downs Pty Ltd is a land and property holding company for the John Dee Group.

The John Dee entities are based in and around Warwick, Queensland, with an inner-city office in Bowen Hills, Brisbane.

The group is predominantly involved with the production and sale of beef products. Relevant company operations include:

- Mixed farming
- Beef cattle breeding
- Beef cattle trading
- Beef processing
- Beef by-product production
- Beef marketing
- Beef trading and distribution
- Related Logistics

The John Dee Group employs over 400 people including both local and foreign workers. Wadmin Pty Ltd is the main payroll company for production staff, the majority of which are employed by the company directly. Approximately 70 staff members are employed in a labour-hire arrangement utilising external labour hire companies.

We have identified a total of 535 individual creditors across our various businesses from July 2023 to June 2024 who have participated in our supply chain from a lessor to a greater degree. These creditors range from local businesses (trade professionals, livestock agents, materials suppliers), to cattle vendors, feedlots, direct customers with credit notes applied, electricity companies, industry bodies, labour hire companies and government departments.



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4. Description of risks of modern slavery practices in our operations and supply chains

The John Dee Group recognises that there is risk in its operations and supply chain that may have the potential to cause, contribute to, or be linked to modern slavery practices. The two main categories of risk identified for the John Dee Group for the financial year 2023 include:

- employment practices; and
- procurement of raw materials in the supply chain process.

Our annual review of the John Dee Group concluded that employment risks remain low for both domestic and foreign employees considering the level of protection guaranteed via the operation of:

- Wadmin Pty Ltd Enterprise Agreement 2021-2023 (EBA), our industry specific arrangement which ensures workers are afforded above award conditions tailored to our workplace in accordance with the Fair Work Act.
- Ongoing training and support services offered on-site to employees through our Human Resources Department;
- Labour union presence on site, affording workers the opportunity to engage in consistent dialogue to reinforce their workplace rights and raise issues as they arise;
- The use of specialist agencies to recruit suitable employees (under the Meat Industry Labour Agreement and Pacific Labour Scheme) who must meet strict compliance with regulations of the Department of Foreign Affairs and Trade, the Department of Employment and Workplace Relations and the Department of Home Affairs;
- The implementation and reinforcement of company policies and procedures which support the wellbeing of staff members and encourage the reporting of issues such as the Whistleblower Policy.

Our supply chain is comprised mostly of products sourced within Australia, such as raw materials, packaging, cleaning products and maintenance services. Our supply chain risks are considered also to be low, in consideration of:

- Accurate source traceability for livestock through known, domestic and reputable suppliers through Australian sale yards and feedlots;
- The maintenance of long-term contracts for the procurement of packaging and raw materials across our operations with industry-recognised suppliers known for their strict regulatory compliance and systems of corporate governance.



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5. Description of actions taken to assess and address risks, including due diligence and remediation processes

Through our risk management framework an Operational Risk Register is maintained and reviewed regularly by the Board. Our established policies and procedures, in particular our Whistleblower Policy and complaints management processes are used to investigate concerns and grievances as they arise. Key issues are reported to the Board of the John Dee Group and tabled for discussion and action monthly.

5.1. Protecting our workers

Recruitment, employee and worker engagement is managed through our Human Resource policies and procedures which are aligned with industry and governmental standards such as the *Work Health and Safety Act 2011 (Qld)*, *Age Discrimination Act 2004 (Cth)*, *Disability Discrimination Act 1992 (Cth)*, *Racial Discrimination Act 1975 (Cth)*, *Sex Discrimination Act 1984 (Cth)*, *Modern Slavery Act 2018 (Cth)*, *Migration Act 1958 (Cth)* and *Fair Work Act 2009 (Qld)*. We require all our recruitment partners to meet these minimum standards.

The following arrangements and contracts are in use to ensure compliance:

- Wadmin Pty Ltd Enterprise Bargaining Agreement 2021 – 2023 (EBA) in accordance with the Fair Work Act.
- Meat Industry Labour Agreements (MILA) and Pacific Labour Scheme (PLS) sourced employees – we engage with specialised, outsourced recruitment partners to source prospective employees in accordance with the MILA and PLS with strict regulation surrounding visa requirements, employee suitability, employee deductions and employee performance.
- Human resource and First Aid support services offered to employees on site for counselling and referral for specialist assistance.
- Human resource policy and procedure encouraging the reporting of issues and grievances as they arise, for example through the Whistleblower Policy.
- Union presence on site which advocates and educates on worker's rights.
- Operational Risk Register which logs issues as they arise which is brought to the attention of the Board for actioning monthly.
- Continuous engagement with industry bodies and governmental departments to improve our processes of recruitment, on-boarding and employment to ensure the fair treatment of all domestic and migrant workers.



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5.2.Managing our Suppliers

We have embedded due diligence processes and oversight of risks in standard supplier and procurement management processes for existing suppliers and as part of the approval process for new suppliers. We assess the risks of engaging with a supplier through these processes and as part of contract management.

6.Description of assessment of effectiveness of actions

The John Dee Group engages in ongoing monitoring and compliance through audits, internal due diligence and review of policies and procedures to identify gaps and inform our next steps and plans to eradicate modern slavery from our operations and supply chain.

The John Dee Group recognises the need for continuous improvement in this area, and plans to implement:

- Supplier Approval Questionnaires which include the requirement of ethical sourcing and business practices and guarantee compliance with the *Modern Slavery Act 2018* (Cth).
- Undertake supply chain mapping as part of our operational risk review, categorising risk of operations by sector, product and geography.
- Review labour hire contracts, policies and procedures to ensure best practice is met on behalf of our employees.
- Review corporate governance risk and compliance framework, policies and procedures.
- Continue to educate our suppliers on modern slavery requirements.

7.Process of consultation with entities the reporting entity owns or controls

The John Dee Group prepared this joint statement in consultation with each John Dee reporting entity. This consultation process included oversight and approval by the Board of Directors across the John Dee Group and all relevant management staff.

8.Approval

This statement was approved by the principal governing body, The Board of Directors of each John Dee Group entity on 23 October 2024. Delegated authority was also provided to the General Manager being a responsible member of each John Dee Group reporting entity, to sign and submit the John Dee Group's modern slavery statement for and on behalf of each reporting entity.



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Signed for and on behalf of each reporting entity.

Christopher Fenwicke
General Manager
John Dee Group
Date: 20 November 2024