



Modern slavery statement

2024-25 financial year



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1 Introduction

This joint Modern Slavery Statement (**Statement**) has been prepared by, and made on behalf of, Baiada Pty Limited (**Baiada**) and its wholly owned entities for the 1 July 2024 to 30 June 2025 reporting period in accordance with the Modern Slavery Act 2018 (Cth) (the **Act**).

This Statement reports on Baiada's progress on the commitments it made in its Statement for the 2023-2024 reporting period.

Baiada remains committed to upholding fundamental human rights for all, including by proactively identifying and managing modern slavery risks at all levels of its business.



2 The Baiada Business

The Baiada Group is a family-owned business which spans multiple industries.

2.1 Baiada Poultry

Baiada Poultry Pty Limited, and its related reporting entities, (**Baiada Poultry**) is one of the largest poultry processors in Australia. It operates as a fully vertically integrated business by owning and operating its own farms, hatcheries, feed mills, processing and rendering plants, and producing its own chicken and turkey meat products. Some of Baiada Poultry's products are sold under the Steggles or Lilydale brands.

Baiada Poultry has 8,400 employees across its national operations, which increased by 9% in the reporting period. The majority of Baiada Poultry's employees are employed directly, with 30% being agency workers and 8% being specialist contractors. Baiada Poultry continue to offer eligible agency workers the opportunity to transfer to direct employment to provide them with greater job security and growth opportunities. Baiada Poultry also directly manages the payroll for its specialist contractors to ensure wage and entitlement compliance.

2.2 Celestino

Celestino Pty Limited (**Celestino**) is a property development business operating in New South Wales and Queensland. Celestino focuses on residential, commercial, industrial and mixed-use developments. Celestino has 12 full-time employees.

2.3 Birling Laboratories

Birling Laboratories Pty Limited (**Birling**) is a laboratory business and is accredited to ISO 17025 Standard by the National Association of Testing Authorities Australia (NATA). Birling provides a range of laboratory services to the poultry industry and has a research and development program. Birling undertakes collaborative research with private, government and university researchers.

Birling has 32 employees and has recently relocated to a new fit for purpose facility in Marsden Park, NSW. Birling's operations and supply chain otherwise remain the same as previous years.



3 Baiada's Supply Chain

Baiada's supply chain remains broadly the same as previous reporting periods with our core suppliers remaining largely unchanged. Our supply chain continues to be complex and diverse due to the range of industries we operate in.

Baiada Poultry has 4,000 direct active suppliers and contractors with the majority being based in Australia. In the reporting period, Baiada Poultry deactivated suppliers where there had been no transactions for greater than 2 years which resulted in a 20% reduction of active suppliers.

Baiada continues to focus on procuring from local businesses to support the local economy, particularly in the regional areas where we operate. By focusing on local procurement, Baiada seeks to mitigate its modern slavery risk as Australian based businesses are bound by stricter domestic laws and regulatory oversight compared to regions other suppliers operate in.

Celestino has 495 active suppliers with its major suppliers being professional services providers (engineers, lawyers, environmental scientists, etc) and as such the risk of modern slavery is considered to be low. This will be reassessed as Celestino's supply chain changes and expands to include construction work in the near future.

Birling suppliers are included within the Baiada Poultry suppliers. Birling undertakes the same actions as Baiada Poultry to assess and address modern slavery risk.



4 Risks of Modern Slavery Practices

Baiada takes a proactive approach to ensuring compliance in all areas, including modern slavery which remains a key focus. As our supply chain and operations are largely the same as previous reporting periods, the risks of modern slavery in our operations and supply chains have also remained the same.

We acknowledge that the following factors increase the risk of modern slavery practices:

- location and source of the goods and services;
- types of goods and services being supplied; and
- number of tiers in the supply chain.

We consider that the following risks of modern slavery practices could potentially exist in our supply chains:

- use of forced labour and bonded labour by suppliers;
- use of child labour by suppliers from certain countries of origin; and
- exploitation of migrant workers which can include underpayment of wages.



5 Assessing and Addressing Risks of Modern Slavery Practices

Baiada continues to prioritise and strengthen its approach to mitigating modern slavery risks in its supply chain and operations. Baiada remains committed to developing its people and strategies to ensure the business understands modern slavery risks. We drive a people-centric approach from the top-down to build trust and a 'speak up' culture.

As part of Baiada's enterprise risk management framework, modern slavery risk is governed by the Baiada Advisory Board, the Celestino Advisory Board and the respective Board appointed Risk Subcommittees. The nominated risk owner is the Group HR Manager with management of modern slavery risk being supported by the cross functional senior management team. Modern slavery risk is regularly reviewed and the Baiada Enterprise Risk Register updated as required, with an update in the reporting period completed in November 2024.

Baiada assesses and addresses modern slavery through its supply chains, operations, and policies and procedures.

5.1 Supply chains

Baiada recognises that the key to assessing at-risk suppliers is to communicate and proactively work with them to understand the risks of modern slavery in their business practices.

Baiada continues to ensure that suppliers identified as having possible modern slavery risks have processes in place for managing these and are open to working with Baiada, as is appropriate. Where concerns are identified about supplier performance, Baiada will engage with the supplier seeking constructive dialogue and remediation of non-compliance in accordance with the Baiada's standards.

Where suppliers are unable to demonstrate that they have appropriate risk management controls in place, or are unwilling to share this information, Baiada may take further action such as engaging supplier contract management, implementing a remediation plan or ultimately suspending their services/supply. Such actions will be taken against priority risk areas identified that would cause the greatest harm to people. Substantive supplier legal agreements continue to be signed with key suppliers, the terms of which are commensurate with the risk posed to Baiada, with the express expectation and requirement to comply with legislation. Baiada has audit rights under its contracts to determine supplier compliance by inspecting books and records.

5.1.1 Engagement of suppliers

Baiada Poultry set its expectation for suppliers through its 'Supplier Code of Conduct'. This Code requires suppliers to commit to comply with workplace laws, combat modern slavery in its up-stream supply chains, prohibit child and illegal labour, and acknowledge Baiada's commitment to ethical, legal and socially responsible business practices. Baiada relies on commitments to assist with determining modern slavery compliance and deciding whether to retain existing commercial relationships.

The Code was rolled out in 2021 to the top 20% of suppliers and to date has captured approximately 700 of Baiada Poultry's suppliers. Since 2022, all new national suppliers are required to complete an acknowledgement of adherence to the Code during onboarding. In this reporting period, all substantive Baiada-issued template contracts with suppliers contained a reference to the Supplier Code of Conduct.

Suppliers that pose a higher risk to Baiada are engaged under formal written terms and conditions which are regularly reviewed and updated as required. For these high-risk suppliers, Baiada includes its expectation for the supplier to meet minimum working standards.

Proposed vendors/suppliers for the poultry business engaged at a national level are also required to complete questionnaires which include information regarding how they identify and manage modern slavery risk. These responses are assessed accordingly and further queries posed, where warranted. Depending on the responses, a supplier may be subject to third party audit and/or be subject to shorter term contracts to allow for regular review before renewal. During this reporting period, Baiada received 49 responses to the questionnaires for review and risk assessment, from which no further information was requested.

5.1.2 Ethical procurement of major consumables

Baiada is committed to ensuring the ethical procurement of its major consumables, being soybeans, grain and manufacturing equipment. Whilst the majority of Baiada's suppliers are based in Australia, Baiada's consumables are mainly procured from Asia (predominantly China), and these remain Tier 2 suppliers via Australian-based businesses. The actions being taken to mitigate the risk of these suppliers is described in section 5.1.

Argentina remains the main source of soybean procurement. Baiada manages and mitigates its modern slavery risk by procuring soybeans through its largest supplier who:

- is a member of the Round Table on Responsible Sourcing of Soy (RTRS), which provides risk controls and assurances;
- has published a comprehensive commitment on its website and provided its annual Modern Slavery Statement; and
- partnered with Baiada on Sedex this reporting period; and
- is actively seeking further information on their operations for increased visibility into its operation based in Argentina.

Baiada is currently undertaking a review of its 'Soy Sourcing Policy Statement' issued in April 2022 to validate that our supply of sustainable soybean meal is from regions not undergoing deforestation since 2020. This is expected to be finalised in early 2026.

Baiada's grain procurement within Australia is subject to Rule 26.0 of the Grain Trade Australia Trade Rules which includes rules for Modern Slavery and Anti-Corruption. These rules also comprise the voluntary Grain Trading Standards and Codes of Practice, which were developed through industry consultation. These rules are governed by industry bodies such as Grain Trade Australia (GTA).

Manufacturing equipment is generally sourced from western European countries. In the previous reporting period, four major processing equipment suppliers were requested to provide additional information with respect to metals (a known area of risk) used in the manufacture of the equipment purchased. At the end of the reporting period, no modern slavery risks were identified through this process.

5.1.3 Monitoring risks in the supply chains

Baiada maintains a Modern Slavery Standard which outlines the system for identifying and managing modern slavery risks. Baiada's Supply Chain Working Group continues to meet, usually every quarter, to monitor all aspects of supply chain risk. The Supply Chain Working Group has prioritised modern slavery risk as a standing agenda item this reporting period.

In the three meetings held in FY 2024-25, two new initiatives were raised for consideration including the introduction of a supplier management platform to streamline the current, labour intensive, onboarding and due diligence process. The platform would allow for the inclusion of a modern slavery risk assessment of new suppliers which is currently completed via a physical modern slavery questionnaire. The second initiative relates to our formal supplier performance review meetings being revised to include modern slavery policy and Sedex membership / partnership within the agenda. Since FY 2023-24 the working group membership has increased to include representation from all key business areas including Livestock, Operations, Procurement, Distribution, Commercial, Finance, Risk and People resulting in greater cross functional coverage, experience and insight being applied to meeting discussions and the further development of modern slavery risk mitigation strategies. This increased involvement has also improved modern slavery risk awareness and management of the risks on the front line.

Baiada has continued its membership of Sedex as an "AB" supplier category for the poultry business. Baiada maintains its "AB" supplier category by completing the Self-Assessment Questionnaire (SAQ) for its 14 major operating sites at least once during the reporting period. Baiada Poultry uses Sedex to manage and mitigate modern slavery risk in the following ways:

- (a) Baiada Poultry uses Sedex to assess supply chain risk, along with BSI SCREEN (Supply Chain Exposure Evaluation Network). BSI SCREEN provides up-to-date reporting and analysis of supply chain risks worldwide. In the reporting period no heightened risk alerts were generated by BSI SCREEN in respect of the Baiada Poultry supply chain for packaging, PPE and ingredients.
- (b) Baiada Poultry links with its major business partners on Sedex which provides greater visibility over our upstream and downstream supply chains. As at 30 June 2025, Baiada Poultry has linked with 60 of its major business partners. Over 30% of these business partners are customers which provides greater visibility of the downstream supply chain. Baiada continues to drive the importance of Sedex membership with vendors and aims to continue growing these partnerships year on year.
- (c) Once SMETA audits are completed and site SAQs published, Baiada Poultry makes them available on Sedex to our partnered customers.

5.1.4 Third party audits

As previously reported, Baiada conducts third party audits through its SMETA audit program. In FY 2024-25, Baiada commenced its SMETA 2-Pillar audit program for 14 contractors / suppliers which are assessed as 'higher risk' due to the nature of their work, the proportion of their migrant workforce and the volume of work they conduct at Baiada sites. Seven cleaning, four deboning, two security and one major transport provider participated in the SMETA audit with Baiada reviewing findings and contractor responses. Baiada requested 3 contractors to be re-audited to address key gaps noted in

initial audit findings, which will be completed by Q3 of FY 2025-26. Due to the success of the SMETA audit program increasing risk visibility, Baiada will continue the program in the next reporting period.

Baiada conducted a review and gap analysis of the upgraded SMETA Version 7.0 audit program which added elements to the four 'Pillars'. Baiada then developed an action plan to implement the new program for tighter management and oversight of modern slavery risks. Baiada implemented this action plan to ensure all sites were audit-ready for the 2025 round. The initial audit results of Version 7.0 showed reduced findings compared to previous SMETA audits undertaken with two sites reporting zero non-conformances.

5.1.5 Reporting and addressing modern slavery risks

Baiada continues to maintain the Baiada Stopline in accordance with the Whistleblower Policy. The Baiada Stopline is a confidential hotline service operated by an independent third party which is available for all stakeholders to raise concerns or complaints. It is accessible by phone, fax, email, post, Baiada website and via the Stopline app and is widely advertised at sites. Baiada is committed to investigating every whistleblower report thoroughly and taking appropriate action, where warranted.

Any instances of suspected supplier non-compliance triggers a thorough and fair investigation followed by analysis of the findings and risk-based outcomes. Where necessary, any instances are reported to the appropriate regulatory bodies. Baiada records these instances and their resolution steps on its Modern Slavery Incident Log. Baiada uses the Modern Slavery Incident Log to track incidents and KPI's, identify any trends and allow for easy reporting.

There were two suspected instances of modern slavery related incidents identified within this reporting period:

- In October 2024, Baiada received a report regarding shared worker accommodation near a processing site being of concern. Initial information gathering on this accommodation identified two further residential addresses being reviewed. Baiada investigated the issues thoroughly with guidance from the NSW Anti-Slavery Commissioner. The report was not substantiated.
- In June 2025, one of our employment agencies contacted the Australian Federal Police with concerns that their worker at Baiada's site may have been involved in a modern slavery situation. This incident was investigated. The worker did subsequently confirm they were not requiring assistance and were satisfied with their accommodation arrangements.

5.1.6 Celestino

Celestino's supply chain remains relatively unchanged from the previous Statement. During this reporting period, Celestino issued one material construction project for tender and the bidders for that work were required to provide details of the reasonable steps they take to identify, assess and address modern slavery risks within their operations and supply chain, as well as providing assurance of compliance to the Act. Otherwise, there was no substantive active construction and no procurement of construction or building materials. As the modern slavery risk will evolve over time as the business changes in line with the expected growth of construction projects, Celestino has engaged an external consultant to develop an ESG framework, which will include a modern slavery policy and procedure.

Celestino expect to develop their ESG framework in the next reporting period.

5.2 Operations

5.2.1 Sites

Baiada Poultry's on-site workforce operates under Enterprise Agreements which provide covered workers with a dispute resolution process. Baiada's major manufacturing operations are subject to the Ethical Sourcing Policy and the Social Accountability Program which set out Baiada's position on ethical conduct and labour practices.

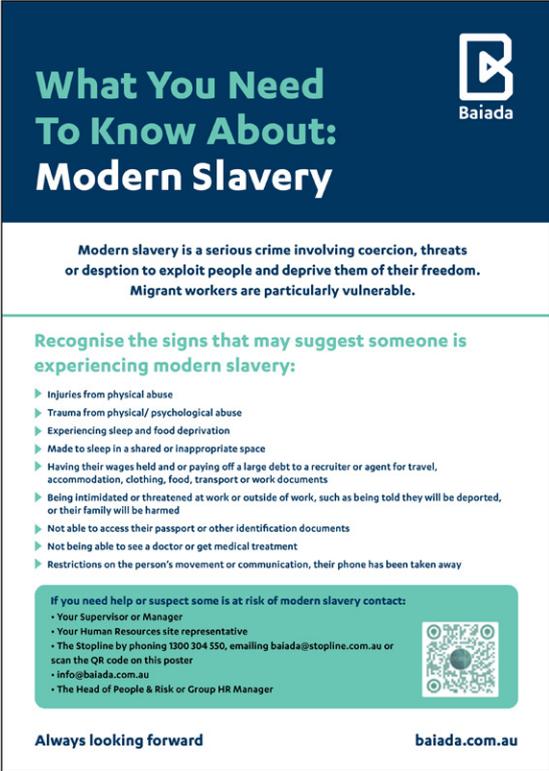
In FY2024-25, Baiada prepared an updated Social Accountability Program that is in accordance with the SMETA Version 7.0 and the Ethical Trading Initiative Code (ETI Code). The updated Social Accountability Program will be implemented in the next reporting period following completion of the current SMETA audits.

In FY2024-25, three Baiada sites completed SMETA 4-Pillar Audits with the majority of findings relating to work health and safety. Baiada addressed all findings by implementing robust preventative actions that were accepted by the auditors.

5.2.2 Workforce

Baiada continued to manage and mitigate its modern slavery risk in our workforce during the reporting period in different ways, including:

- (a) Raising awareness of modern slavery risks by distributing our new modern slavery posters to all sites in July 2025. These modern slavery posters outline how to identify modern slavery risks in the workplace, report modern slavery risks and gain support. The posters contain a QR code to report directly to the Stoline.



The poster is titled "What You Need To Know About: Modern Slavery" and features the Baiada logo. It defines modern slavery as a serious crime involving coercion, threats, or deception to exploit people and deprive them of their freedom, noting that migrant workers are particularly vulnerable. It lists signs of modern slavery, such as physical/psychological abuse, sleep deprivation, shared/inappropriate sleeping quarters, wage withholding, debt, intimidation, and restricted movement. It provides contact information for reporting, including supervisors, HR representatives, the Stoline (1300 304 550), and a QR code. The footer includes the slogan "Always looking forward" and the website "baiada.com.au".

What You Need To Know About: Modern Slavery

Modern slavery is a serious crime involving coercion, threats or deception to exploit people and deprive them of their freedom. Migrant workers are particularly vulnerable.

Recognise the signs that may suggest someone is experiencing modern slavery:

- ▶ Injuries from physical abuse
- ▶ Trauma from physical/ psychological abuse
- ▶ Experiencing sleep and food deprivation
- ▶ Made to sleep in a shared or inappropriate space
- ▶ Having their wages held and or paying off a large debt to a recruiter or agent for travel, accommodation, clothing, food, transport or work documents
- ▶ Being intimidated or threatened at work or outside of work, such as being told they will be deported, or their family will be harmed
- ▶ Not able to access their passport or other identification documents
- ▶ Not being able to see a doctor or get medical treatment
- ▶ Restrictions on the person's movement or communication, their phone has been taken away

If you need help or suspect some is at risk of modern slavery contact:

- Your Supervisor or Manager
- Your Human Resources site representative
- The Stoline by phoning 1300 304 550, emailing baida@stopline.com.au or scan the QR code on this poster
- info@baida.com.au
- The Head of People & Risk or Group HR Manager

Always looking forward baiada.com.au

- (b) Continuing to develop Baiada’s Human Resources reporting dashboard to capture grievance data, with the introduction of deeper categorisation of incidents which has allowed a greater understanding of trends and proactive training programs required.
- (c) Completing six-monthly reviews of the residential addresses of Baiada’s boning contractors’ employees. This review involves identifying addresses where more than five employees reside, assessing whether the property is suitable for the number of employees and initiating further investigation if required. In April 2025, Baiada expanded these reviews to include direct employees and other classes of contractors.
- (d) Conducting six-monthly interviews with a sample of Baiada’s boning contractors’ employees which focus on working conditions and wages. These interviews are conducted with translators as required. In April 2025, Baiada expanded these reviews to include direct employees and other classes of contractors.
- (e) Utilising two nationally registered (and licenced in states where this is a requirement) labour hire companies when hiring indirectly.
- (f) Undertaking annual payroll audits on the two labour agencies used by Baiada. Audits undertaken in the reporting period identified one minor issue which was immediately rectified.
- (g) Providing payroll services to boning contractors, including one new contractor, to mitigate the risk of underpayment.
- (h) Commissioning an external third-party to complete a payroll audit on Baiada’s workforce, which reported no major findings. As previously reported, Baiada commissioned an external third-party to complete a payroll audit on boning contractors in 2023 and the next audit is due to complete in early 2026.
- (i) Implementing a new initiative of quarterly internal payroll audits that concentrate on specific sites and focus areas across one pay cycle. These quarterly audits reported no major findings and reported minor findings were rectified immediately.

5.2.3 Working rights

Baiada utilises different systems to ensure that employees, agency staff and contractors have the appropriate working rights. Any working rights anomalies are reported to Managing Director level and immediately addressed with preventative actions.

In FY2024-25, Baiada implemented a Migration Risk Assessment & Control Improvement Plan to manage risks arising from inappropriate working rights in the workforce. Baiada also completed a review and risk assessment of all visa types through commissioning a specialist external law firm to review our systems and an external auditor to complete vSure audits. This assessment identified additional controls and prompted an update to its ‘Migration Risk Assessment & Control Improvement Plan’. Baiada has also prepared an overarching Immigration Policy which is proposed to be introduced in the next reporting period.

5.2.4 Training and support

In the reporting period, Baiada continued to develop its people to assess and address modern slavery risks in several ways:

- (a) Baiada developed and implemented an updated modern slavery training package for management to provide them with the tools and confidence to effectively identify, address and manage modern slavery risks. The training package was delivered by an external legal firm to over 50 managers including the Managing Director.
- (b) Baiada's key senior management participated in modern slavery webinars and training sessions including a full day Modern Slavery Training Workshop facilitated by an external provider. Additionally, senior management in procurement and sustainability participated in various workshops focused on modern slavery and human trafficking in global supply chains and procurement.
- (c) Baiada's Risk and HR management were kept informed of updates from the Anti-Slavery Commission (both at national and state levels) and participated in applicable online forums.
- (d) Baiada developed a Respect@Work training package for management and front-line employees with the support of a third-party specialist HR legal provider. The first compulsory training session for senior management aimed to provide an understanding of the legislation changes with respect to sexual harassment and psychosocial hazards in the workplace, employer's responsibilities, and the role and responsibilities of managers. The session was attended by approximately 40 managers nationally including the Managing Director. Baiada intends to develop this training for supervisors and front-line employees in FY2025-26.
- (e) Baiada implemented training programs for middle management including trialling a five-day workshop focusing on inappropriate workplace behaviour, communication and developing soft skills, and a two-day New Leader training for 10 emerging leaders across the country which was led by the Australian Institute of Management.

In addition to providing training, Baiada provides wellbeing supports to its employees which improve management's ability to identify where a person may need assistance and give them confidence to provide support if a potential modern slavery situation is identified. Baiada continues to offer a free and confidential counselling service for work related and personal concerns to employees and their families via the Access Employee Assistance Program (**Access EAP**). In October 2024, Access EAP conducted site visits to promote Mental Health Awareness month which included mental health awareness sessions and one on one sessions enabling staff to speak with a clinician. Additionally, Baiada completed Workforce Mental Health training for its key national senior managers.

5.2.5 Collaborating with key organisations

In FY2024-25, Baiada has built relationships and engaged in meaningful collaborations with key organisations in an effort to combat modern slavery, including:

- (a) The NSW Office of the Anti-Slavery Commissioner invited key Baiada team members to attend a session entitled 'Modern Slavery Risks in Agriculture and Meat Processing' with Sophia Kagan (Principal Policy Adviser – Labour Migration). The session focused on the research on the possible modern slavery risks present with at-risk migrant workers in agriculture and meat processing in regional New South Wales. The session also discussed and sought recommendations to address these risks.
- (b) Senior Baiada team members attended an online webinar hosted by the Office of the NSW Anti-Slavery Commissioner entitled 'From Farm to Fork – How can we eliminate Modern Slavery from our food?'. This session involved experts discussing modern slavery risks for temporary migrant workers in New South Wales including forced labour, debt bondage and deceptive recruiting.
- (c) In June 2025, Baiada's Group HR Manager attended an industry roundtable on the modern slavery risks faced by temporary migrant workers in rural and regional New South Wales.
- (d) Collaboration also occurred between Baiada and the Directors of 'Be-Slavery Free' in January 2025 which has opened the possibility of further partnership in the future.

5.3 Our Policies and Procedures

Baiada has the following governance policies and procedures in place to manage and mitigate modern slavery risks:

- (a) Inappropriate Workplace Behaviour Policy
- (b) Grievance Policy and Procedure
- (c) Whistleblower Policy
- (d) Privacy Policy
- (e) Supplier Code of Conduct
- (f) Soy Sourcing Policy Statement
- (g) Ethical Sourcing Policy
- (h) Social Accountability Program

Copies of these policies and procedures are available to employees via the Baiada intranet, payroll platform and on noticeboards at sites.

In the reporting period, Baiada began work on new policy and procedure documents to strengthen our modern slavery framework including a national Human Rights Policy and Employee Code of Conduct. Baiada has started drafting a Human Rights Policy which



will capture the ETI Code requirements and a broad commitment to upholding human rights. In FY2024-25, Baiada engaged a specialist third party to undertake research and engagement on developing an Employee Code of Conduct. The research and engagement was focused on ensuring the Employee Code of Conduct would be an easy-to-understand reference guide for our employees' use. To ensure the Employee Code of Conduct is accessible to all our employees, it will be made available in our employees' most common language (other than English). In the interim, Baiada will continue its training at major operational sites on the Ethical Sourcing Policy and Social Accountability Program.

6 Continuing Actions and Commitments for 2025-2026

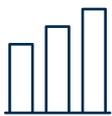
In addition to continuing the actions outlined in this Statement, Baiada proposes to undertake the below actions for the next reporting period.

6.1 Supply chains

- (a) Reviewing current suppliers to identify suppliers who have not received and accepted the Supplier Code of Conduct. Baiada will then require identified suppliers to accept the Supplier Code of Conduct.
- (b) Expanding Baiada's modern slavery governance for higher risk suppliers and contractors, including requiring eight additional contractors to participate in Baiada's 2-Pillar SMETA audit program.
- (c) Reviewing Baiada's procurement resources including the commencing of a project to introduce a supplier portal to improve the efficiency of the supplier risk assessment process.
- (d) Undertaking a review of Baiada's transport providers to prepare for these providers to participate in the next 2-Pillar SMETA audit program.

6.2 Operations

- (a) Implementing Baiada's new Employee Code of Conduct and Human Rights Policy.
- (b) Completing further and refresher workplace training on the Fair Work Act to ensure management and HR are equipped to effectively assess and address risk in the workplace.
- (c) Implementing further Respect@Work initiatives including:
 - (i) developing training for supervisor and front-line employees;
 - (ii) rolling out a national poster campaign which provides how employees can report incidents and seek support; and
 - (iii) commencing a review of the policies and documents on workplace behaviour.
- (d) Commencing an education campaign across sites to front-line employees on modern slavery risks, and how to report concerns and seek support. This education campaign will be in addition to ongoing training on the Modern Slavery Standard, Ethical Sourcing Policy and Social Accountability Program.
- (e) Reviewing and, if required, updating Baiada's Modern Slavery Standard.



- (f) Baiada will continue to seek out opportunities to build trust-based and collaborative relationships with business partners, employee organisations and government bodies to share knowledge and develop risk control mechanisms.

6.3 Celestino

Celestino has commenced work on the developing an ESG framework, which will include a 'fit for purpose' modern slavery policy and procedure outlining actions the business will take to identify and address the risk of modern slavery including tracking and reporting procedures, supplier / contractor requirements and risk assessment framework.

7. Assessing Effectiveness of Baiada's Actions

Baiada assesses the effectiveness and performance of modern slavery risk controls and initiatives in the following ways:

- (a) tracking the results of our ethical audits through an internal Corrective Action Request Log which ensures that timely preventative and corrective actions are taken;
- (b) tracking modern slavery incidents or issues in the workforce and suppliers through maintaining and reviewing an Incident Log maintained by the People & Risk Management team;
- (c) reporting quarterly to the highest level of governance on the number and nature of issues raised via the Stopline and other grievance mechanisms;
- (d) reviewing the extent of communications to staff on training available on modern slavery and other ethical issues;
- (e) receiving feedback from business partners and customers regarding Baiada's approach to modern slavery risk management; and
- (f) monitoring the percentage of issued contracts which require compliance with laws regulating modern slavery.



8. Consultation Process

This statement has been prepared in consultation with each reporting entity, assisting to facilitate the identification, assessment and remediation of modern slavery risks.

The majority of Baiada's senior management have actively engaged in the consultation process through management meetings.

9. Conclusion

The ongoing commitment of Baiada is to further investigate its supply chain to identify modern slavery risks and to take appropriate actions to mitigate those risks. This Statement reflects that commitment.

10. Declaration

Prior to lodgement of this Statement, this Statement was prepared and provided to the Risk Subcommittee and ultimately to the Advisory Board for endorsement and feedback, where adjustments have been made accordingly.

This joint Statement has been approved by the Board of Baiada Pty Limited as the parent entity of the reporting entities in December 2025 and is signed by a member of the Board on behalf of all reporting entities.



George Tsekouras

Director: Baiada Pty Limited

Date: 19 December 2025



Baiada