



# WESTERN MEAT PACKERS GROUP

## MODERN SLAVERY STATEMENT

2022



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## INTRODUCTION

Since inception in 1983, Western Meat Packers Group (WMPG) is a proudly Western Australian, family-owned business, and today, is one of Australia's most trusted beef and lamb exporters and processors, serving both domestic and international markets. To add, our integrated operations include an abattoir (Cowaramup), a boning and packing plant (Osborne Park), a retail-ready butcher shop (Osborne Park), and a specialist hi-tech packing facility (Bibra Lake).

At WMPG, we appreciate the origins and purpose of the Australian Modern Slavery Act 2018 (Cth) (Modern Slavery Act) and the role we must play in ending Modern Slavery, in all its forms.

Whilst the challenge of ensuring we avoid any involvement in modern slavery is significant, WMPG is committed to improving our practices to combat slavery and human trafficking. We recognise that slavery and human trafficking is a real, yet hidden issue in our society, and as such, will not tolerate slavery and human trafficking throughout our business and/or supply chain. We are committed to acting ethically, and with integrity and transparency, in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that any form of slavery is not taking place in our own business or supply chains.

We are dedicated to achieving the important objectives we set for ourselves in establishing an effective and robust Modern Slavery program at WMPG. This work will continue with transparency about both our failures and our achievements and establish clear commitments to improving our business practices.

Unless otherwise stated, this statement is published on behalf of WMPG and its reporting entities and sets out the steps taken during the reporting period (31st June 2022) to minimise the risk of slavery and human trafficking within our business and supply chains.

Signed by,

**Andrew Fuda**  
Western Meat Packers Group  
Chief Executive Officer





## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN



100% owned by its founders, Rodney and Shana Russell, WMPG started from modest beginnings in 1983 in a small boning room in Western

Australia and has significantly expanded its operations to supply both Australian and International markets.

WMPG is a vertically integrated business (excluding MAP WA) and comprises of the following entities:

**Shagay Pty Ltd atf The Shagay Unit Trust T/A Western Meat Packers.** Western Meat Packers sources premium cattle from approved farmers/suppliers and prides itself in consistently producing a quality assured meat product that delivers taste and nutrition to an increasingly discerning consumer both domestically and overseas. In addition to supplying a variety of retailers in Australia (butchers, supermarkets, wholesalers, hotels, and restaurants), WMPG products are also distributed and exported to North America, Japan, Korea, Southeast Asia, and the Middle East. 121 floor staff are employed under this business unit.

**Horseshoe Investments Pty Ltd atf The Rod Russell Family Trust.** The Rod Russell Family Trust employs 28 administration and management staff who manage and oversee the day-to-day operations of Western

Meat Packers. This group of staff are employed within Finance, Human Resources, Workplace Health, Safety & Environment, Engineering, Information Technology, Quality Assurance, Sales (domestic and export), and Livestock.

**Western Cold Storage Pty Ltd.** Situated on the same site as Western Meat Packers, Western Cold Storage (WCS) prides itself in cold chain management with cold storage and freezing facilities available to facilitate the convenience and accuracy of storage and dispatch. Stock is palletised quick frozen as necessary or stored in a chilled state, enhancing product shelf life. In addition, WCS also employs staff at WMPG's flagship butcher shop, WA'S Big Butcher, situated next door to WMPG. WCS employs 33 personnel.

**Western Meat Processors Pty Ltd atf The Western Meat Processors Unit Trust.** Located in a small country town in the South-West region of Western Australia (Cowaramup), our abattoir services Western Meat Packers by providing a highly skilled slaughtering service where stock is processed and transported to our Osborne Park production facility, via modern refrigerated vehicles. Western Meat Processors employ 98 staff.





**The Trustee for the MAP WA Unit Trust T/A MAP WA Pty Ltd.** Established in 2011, MAP WA is a service provider to the national supermarket giant, Coles. Established to provide retail ready meat products (beef, pork & lamb) exclusively for Coles supermarkets, MAP WA produces approximately 190T weekly, across six production lines in a state of the art facility, employing 180 staff.

With an annual turnover of more than \$150 million, WMPG employs over 460 staff between its five business units. 100% of WMPG's workforce is based in Australia and employed in compliance with local and statutory regulations. Our workforce includes full time, part time, casual and fixed term contract employees and our employment terms and conditions of employment are governed by the Fair Work Act and the National Employment Standards (NES), covered in various industrial awards, in addition to a Workplace Enterprise Agreement for our boners and slicer workforce at Western Meat Packers. Our contracts of employment set out the minimum terms and conditions of employment, aligned with the NES, including:

- Hours of Work
- Remuneration

- Leave entitlements, including annual leave, public holidays, parental leave, personal/carer's leave, compassionate leave, jury service leave community leave, jury service leave and family and domestic violence leave.
- Notice period

WMPG's most significant procurement activities relate to the acquisition of livestock for processing. Our livestock team sources a wide range of cattle from producers throughout Western Australia to meet the precise requirements of each product specification. Our livestock suppliers comprise a variety of small and medium sized independent farmers. In addition to this, we also procure other goods and services from Australian based organisations, to support our broader business. These include, feed grains, product ingredients, packaging consumables, personal protective equipment, electronics and hardware, machinery and equipment, slaughtering services, laundry services, hygiene services, transport and logistics providers, engineering and maintenance services, and security services.





## OUR VALUES AND COMMITMENT TO HUMAN RIGHTS

### Our Values

**Safety.** The safety of our team is our No. 1 priority. We recognise that safety is paramount in all the tasks we do and that our behaviours and actions contribute to the overall safety of our team.

**People.** Our people are our No. 1 asset. We work as a team, lead by example, and support each other. We seek to promote and maximise the potential of our people.

**Empowerment.** We encourage and engage our people in the decision-making process. We recognise our mistakes are as important to our growth as our successes.

**Integrity & Respect.** We encourage truthful and open feedback, praising more and criticising less. We recognise the viewpoints and contributions of others by observing WMPG's Code of Conduct. We are honest and take responsibility for our actions.

**Excellence.** We strive for excellence in everything we do. Exceeding expectations by being energetic, agile, and proactive in finding solutions.

**Celebrate Success.** We enjoy our successes as a team by encouraging and promoting our achievements.

### Our Commitment to Human Rights

At WMPG, we are committed to acting ethically and with integrity across all aspects of our business, and respecting human rights across everything we do. People, our No.1 asset, are central to our business, and we impact the daily lives of many – our customers, our team members, our suppliers, workers in our extended supply chain and the communities in which we live and work. We recognise the importance of human rights for sustainability, the major global problem modern slavery poses, and the importance of its inclusion in Goal 8 (Target 8.7) of the United Nation's Sustainable Development Goals.

We acknowledge the risk of modern slavery occurring in our own operations and supply chain, and that significant resources must be invested in building effective systems and processes to address the risk. We also acknowledge we have more work to do to formalise and fully embed these systems and processes.





During the reporting period, WMPG went through a period of significant growth. This growth included a number of acquisitions as well as organic growth across our Group. During this period of growth, we restructured our key business functions and processes to ensure our key personnel understand the range of modern slavery risks we face across the business. We also established formal business structures to manage these risks.

In addition, through WMPG's sustainable procurement strategies we consider the impact of the environmental, economic, and social factors alongside price and quality. Our Corporate Social Responsibility strategies encourage improvements in practices to ensure when procuring we are aware of and lookout for signs of unacceptable practices in our supply chain, such as fraud, corruption, modern slavery, human trafficking and child labour.

At WMPG, we are committed to:

- Ensuring human rights are understood, respected and upheld in accordance with internationally recognised human rights principles.
- Respecting the human rights of workers throughout our supply chain. We expect our partners and everyone in our supply chain to have the same commitment.

- Striving to eliminate the potential for labour and human rights issues in our supply chains and operations, highlighting areas of risk and ensuring we make responsible procurement decisions.
- Listening to the experiences of the most vulnerable by encouraging dialogue and consultation, including a key focus on worker voice and engaging with our stakeholders.
- Ensuring our operational-level grievance mechanisms are accessible, predictable, equitable, transparent, rights-compatible and legitimate.
- Serving our customers safely and without discrimination, respecting their privacy and prioritising accessibility for all.





## IDENTIFICATION OF MODERN SLAVERY RISKS IN OUR OPERATIONS & SUPPLY CHAIN

Modern Slavery is a violation of fundamental human rights and is defined by a range of legal concepts including, child labour, forced and compulsory labour, debt bondage, forced marriage, slavery, servitude, and human trafficking. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.

### Operations

We acknowledge that WMPG operate within the Agricultural and Meat Processing sectors, and that both these industries are generally recognised as having an inherent risk of the employment of vulnerable workers due to potential exploitation of migrant workers and risks surrounding underpayment of wages and bonded labour.

However, the direct operations of WMPG are considered to have a medium risk of modern slavery practices for the following reasons:

WMPG does not operate outside of Australia;

- 100% of WMPG workers are directly employed by WMPG, not through labour hire or third parties;

- Employees are typically covered by the terms of collectively negotiated enterprise agreements approved by the Australian Fair Work Commission. The agreements stipulate minimum conditions for wages, hours of work, overtime conditions, additional remuneration, leave entitlements and redundancy benefits. Where the relevant employees are not covered by enterprise agreements, they are typically employed under the terms of modern awards, on above-award wages. For more senior positions, these are commonly engaged under the terms of common law contracts. All employees remain subject to the minimum conditions in the Australian National Employment Standards;
- Our employment practices are fully compliant with all local laws in Australia, and are regularly assessed;
- Our recruitment and selection process has strong governance. Employment decisions are based on the principle of merit, with no instances of forced labour. All employees must demonstrate their legal right to work in Australia before being permitted to commence work.





## Supply Chain

WMPG adopts a decentralised approach to procurement, with each business operation responsible for procuring its own goods and services. With that said, all entities across WMPG, consider the inherent risk of modern slavery the highest within the following procurement categories.

### Cleaning & Security Services

All entities within WMPG use cleaning and/or security services. Services of this nature carry a higher risk of modern slavery as they are typically characterised by a higher volume of lower skilled, lower paid and migrant labour undertaking temporary work.

### Meat Processing and Production

MAP WA rely upon meat processing facilities to manufacture, package, label or store food. Due to the nature of the labour provided, the workforce is typically lower skilled and lower paid.

### Apparel

All entities within WMPG purchase apparel for various purposes, including personnel protective equipment, uniforms and/or merchandise. It is widely known that the garment and apparel industry is characterised by a

higher level of modern slavery and other human rights risk. This applies across every stage of the garment supply chain, from cotton picking to textile production and manufacturing.

### Electronics, Hardware & Software

All entities within the WMPG procure hardware and software products that are essential to delivering services and/or producing goods. It is recognised globally that the electronics industry presents a higher risk of modern slavery, with many known human rights violations occurring within the industry. Poor labour conditions in the electronics industry are largely driven by low profit margins and tiered production systems, as well as the manufacturing facilities being located in higher risk countries, such as China, Taiwan and Brazil, where a lack of regulation and weaker political institutions undermine the rights of workers.

### Freight, Transportation & Logistics

Freight and logistics services are required for the transport of goods produced by entities within the WMPG. The freight, transportation & logistics services carry a higher risk of labour exploitation and modern slavery due to the vulnerability of the workforce. The workforce providing “on the ground” freight, transportation & logistics services consists of workers



vulnerable to modern slavery, including low skilled and low paid workers and migrant workers.

**Travel & Accommodation**

Employees within the WMPG are sometimes required to travel to carry out work. Typically, the workforce in the hospitality industry consists of workers that are low skilled and low paid, migrant workers, and/or women, which makes them more vulnerable to modern slavery.





## MANAGEMENT OF MODERN SLAVERY RISKS

The day-to-day management of modern slavery risk sits within WMPG's senior management team, which includes operational managers, Health & Safety, People & Culture, and Finance & Procurement teams. Whilst we are still formalising specific responsibilities, management teams are responsible for implementing modern slavery risk management into existing business practices and ensuring that all company policies and procedures are adhered to.

### Policy Framework:

During the reporting period, we recognised the need to develop a more formalised policy environment and commenced developing policies and procedures to underpin WMPG's approach to modern slavery risk management. We continue to develop and comprehensively implement these policies which include:

- Code of Conduct
- Anti-Slavery & Human Trafficking Policy
- Anti-Bribery Policy
- Gender Equality Policy
- Whistle-blower Policy
- Recruitment & Selection Policy
- Ethical Sourcing Policy
- Corporate Social Responsibility Policy
- Workplace Grievance Policy

- Harassment & Discrimination Policy
- Privacy Policy
- Grievance Policy

Our Human Resources policies and procedures framework support the United Nations (UN) Guiding Principles on Business and Human Rights, with our Ethical Sourcing Policy based primarily on the Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions, with WMPG ensuring that:

- Products are sourced in an ethically and responsible manner;
- Suppliers are clearly informed about the proper social and environmental practices they are required to implement;
- Local laws are respected;
- Employment is freely chosen;
- Child labour shall not be used;
- Illegal labour shall not be used;
- Appropriate wages are paid;
- Working hours are not excessive;
- Freedom of association and the right to collective bargaining are respected;
- Working conditions are safe and hygienic;
- No discrimination is practised;
- Regular employment is provided;



- No harsh or inhumane treatment is allowed; and,
- Due regard is given to environmental impact

In addition, WMPG's Whistle-blower Policy and hotline are in place to encourage any persons to report any wrongdoing, including but not limited to human rights violations.

#### **Supplier Self-Assessment Questionnaire (SSAQ):**

Our SSAQ was improved from FY21 and expanded to improve the quality of the information provided by suppliers to allow for a more comprehensive assessment of modern slavery risks, and included questions regarding:

- The extent of visibility of modern slavery risks in their supply chain;
- The extent of training of key personnel on how to identify, assess and respond to modern slavery risks; and,
- Screening of prospective suppliers to assess the risks of modern slavery or human rights violations that may occur in its operations and supply chain, including the response process.

The purpose of this questionnaire is to:

- Obtain key factual data with regards to each supplier's operations, supporting internal risk assessments;

- Enable WMPG risk assessments to generate a risk profile based on information provided; and,
- Elevate awareness amongst WMPG suppliers of modern slavery risks and WMPG's commitment to an ethical supply chain.

It is our intention that all suppliers who are subject to WMPG's, and its business units, approval process will be required to complete the supplier questionnaire and assessment before supply commences, with an annual review process implemented.

#### **Sedex:**



WMPG are members of the global Sedex ethical data exchange platform (company reference: ZC4657424) to assist us in managing multi-tier, responsible sourcing data and provide detailed assessments to our customers about our own sites. Sedex is one of the world's leading ethical trade service providers, working to improve working conditions in supply chains. WMPG update our Self-assessment Questionnaire (SAQ) on an annual basis.

In addition, WMPG also participate in a 4-pillar Sedex Members Ethical Trade Audit (SMETA), biennially, which encompasses labour standards, health and safety, the environment and business ethics with any corrective actions closed out within thirty days.





## ASSESSMENT AND EFFECTIVENESS

The effectiveness of the actions taken to assess and address the risks of Modern Slavery in WMPG's operations and supply chain will be addressed in future reporting periods by the following:

### Training & Collaboration

WMPG will influence and leverage change, using training to educate our workforce, including management, by designing a modern slavery training program for all staff to raise awareness on modern slavery; the prevalence of modern slavery within Australia and across the globe; how to identify modern slavery risks in our own supply chain, and steps we can take to address these risks. This compulsory training program will be embedded in our induction program for all new staff moving forward, delivered on a regular basis to all employees, and updated regularly as new, relevant content emerges.

### Supplier Code of Conduct

To protect and respect the rights of all people, including our employees, suppliers, and people who may be impacted by our activities, including those in our supply chains, WMPG will develop a Supplier Code of Conduct (Code). To protect and respect these rights, WMPG will require its suppliers to not only act in accordance with the principles and standards outlined in the Code, but to be fully compliant with all applicable

laws and regulations. This Code will outline our expectations of suppliers and their conduct regarding labour and human rights, workplace health and safety, environmental protection and ethical practices.

### Procurement Policy

WMPG will establish and develop a Procurement Policy which will provide for due diligence on suppliers and their compliance with the Act. Procuring goods and services will, as far as reasonable, be conducted in a way as to ensure that the WMPG and its business units source goods and services from entities that comply with their obligations under the Act. The extent of the due diligence conducted in the procurement process will depend on the types of goods or services being sourced, whereby a tiered supplier framework will be established.

### Risk Assessments

Following on from the establishment of a tiered supplier framework, WMPG will risk-assess direct suppliers based on responses to the SSAQ's. WMPG will conduct due diligence on high-risk direct suppliers by reviewing SSAQ's and verifying responses. Risk assessments will be based against:

- Spend and the products/services provided
- Risk factors including industry
- Assessment against the severity/likelihood of risk
- Assessment of policies and procedures



## CONSULTATION

All WMPG entities operate under a common set of governance policies and programs. This includes the programs through which modern slavery risks in our own operations and our supply chains are assessed and addressed by WMPG. A process of consultation across WMPG and its entities helped to guide the drafting of this statement. This included engagement with members of the Senior Leadership Team, Human Resources, Workplace Health & Safety and Finance teams, across the Group.

This Modern Slavery Statement was approved by the Western Meat Packers Group Board of Directors, including the Chief Executive Officer, on 10 August 2023.

