

# MODERN SLAVERY STATEMENT FY23





# CONTENTS

**PG 3**

MESSAGE FROM OUR CEO

**PG 4**

STRUCTURE, OPERATIONS AND  
SUPPLY CHAIN

**PG 7**

MODERN SLAVERY RISKS IN OUR  
OPERATIONS AND SUPPLY CHAIN

**PG 9**

ASSESSING AND ADDRESSING MODERN  
SLAVERY RISKS WITH OUR SUPPLIERS

**PG 11**

ASSESSING AND ADDRESSING  
MODERN SLAVERY RISKS INTERNALLY

**PG 13**

ASSESSING EFFECTIVENESS

**PG 14**

CONSULTATION WITH  
CONTROLLED ENTITIES



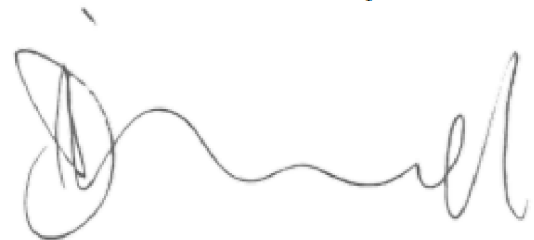
# MESSAGE FROM OUR CEO

I am pleased to share the Modern Slavery Statement for Bindaree Food Group (**BFG**) for the financial year ending 30 June 2023 (**Statement**).

At BFG, we have always believed in acting ethically in all our business practices. We are committed to the well-being of individuals involved in our business, including our team members, contractors, suppliers and their workers, as well as individuals in the wider community. These values inform our approach to human rights, including modern slavery.

This Statement details potential modern slavery risks and what we have done to assess and address those risks, both within our own operations and in our supply chain.

We recognise that taking action on modern slavery is a continual process and we remain dedicated to implementing effective systems and controls to help combat modern slavery.



Andrew McDonald  
Chief Executive Officer





# STRUCTURE

BFG is privately owned and is one of the largest beef processors in Australia, operating in the mid-point of the paddock to plate supply chain and connecting producers with customers through the production of consistent, high quality meat products.

BFG comprises the following reporting entities, as defined in the *Modern Slavery Act 2018* (Cth):

- Yolarno Pty Ltd (ACN 002 255 183) is the parent company of BFG and is responsible for its corporate functions
- Bindaree Beef Pty Ltd (ACN 056 599 163) operates the Inverell Processing Facility, Myola Feedlot and Brisbane Warehouse
- Bindaree Food Group Pty Ltd (ACN 627 335 684) operates the Burleigh Heads Retail Ready Facility (Bindaree Food Solutions)
- Sanger Australia Pty Ltd (ACN 001 085 687) carries out the Export, Sales & Marketing activities of BFG
- Monbeef Pty Ltd (ACN 079 546 964) operates the Cooma Processing Facility (Monbeef was acquired on 29 May 2023 so has not been included for the purpose of this report but will be included in future reports)

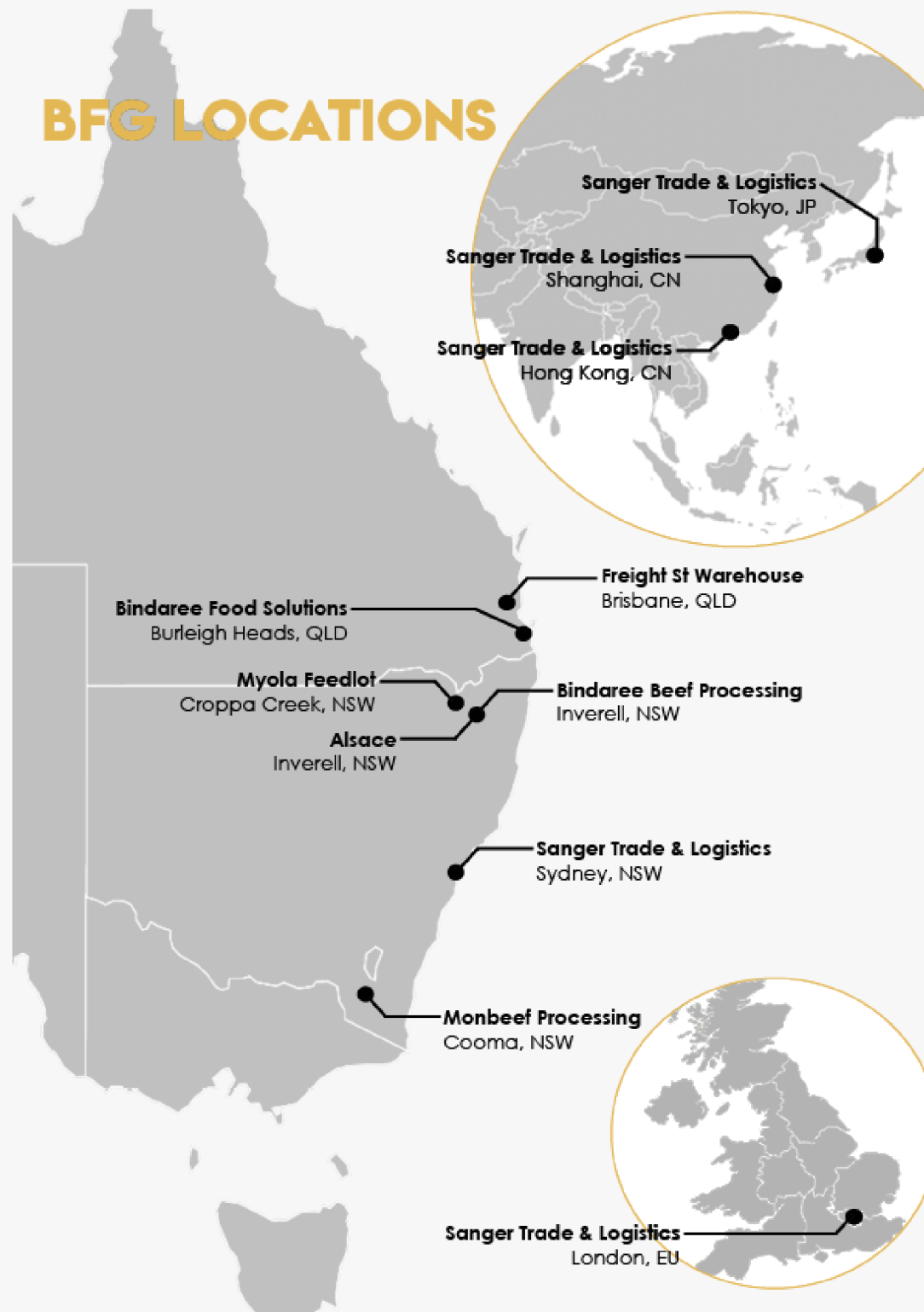
In addition to these key Australian operating entities, BFG also has sales operations in Shanghai, Hong Kong, Tokyo and London.





# OPERATIONS

## BFG LOCATIONS



BFG is a vertically integrated business with most of our operations located in Australia (NSW and Queensland).

**Myola Feedlot** Situated in the heart of the NSW ‘Golden Triangle’, our Myola Feedlot has access to premium locally grown grains to provide our cattle with the highest quality feed. Its proximity to Inverell also makes it an integral part of our supply chain. The feedlot has a licence to carry 20,000 head of cattle, and we have 34 employees in the Myola team.

**Bindaree Beef Processing** Our primary processing facility is located in the picturesque New England region of northern NSW and employs 851 team members. It boasts a specialised slaughter floor, boning room, cryovac facility, render plant and load-out area. Our skilled team is committed to delivering the highest quality beef products to customers worldwide. Neighbouring the processing facility is our Alsace property, which supports irrigation and wastewater solutions for our operations.

**Freight St Warehouse** Our warehouse in Brisbane, QLD is a cold storage centre with a primary function of receiving and despatching chilled and frozen beef products, and employs 24 team members.

**Bindaree Food Solutions** Our retail ready plant is located at Burleigh Heads and employs 182 people. Bindaree Food Solutions’ facility provides the capability to produce branded retail ready meat products for supermarkets and other key customers.

**Sanger Australia** Sanger Australia is the export and logistics division of BFG, located in Sydney NSW. Our team provides unparalleled customer service and a seamless end to end export process, from product sourcing and documentation through to logistics and shipping.

**Overseas Offices** BFG has small overseas sales offices that drive understanding of consumer behaviour and needs in different markets.

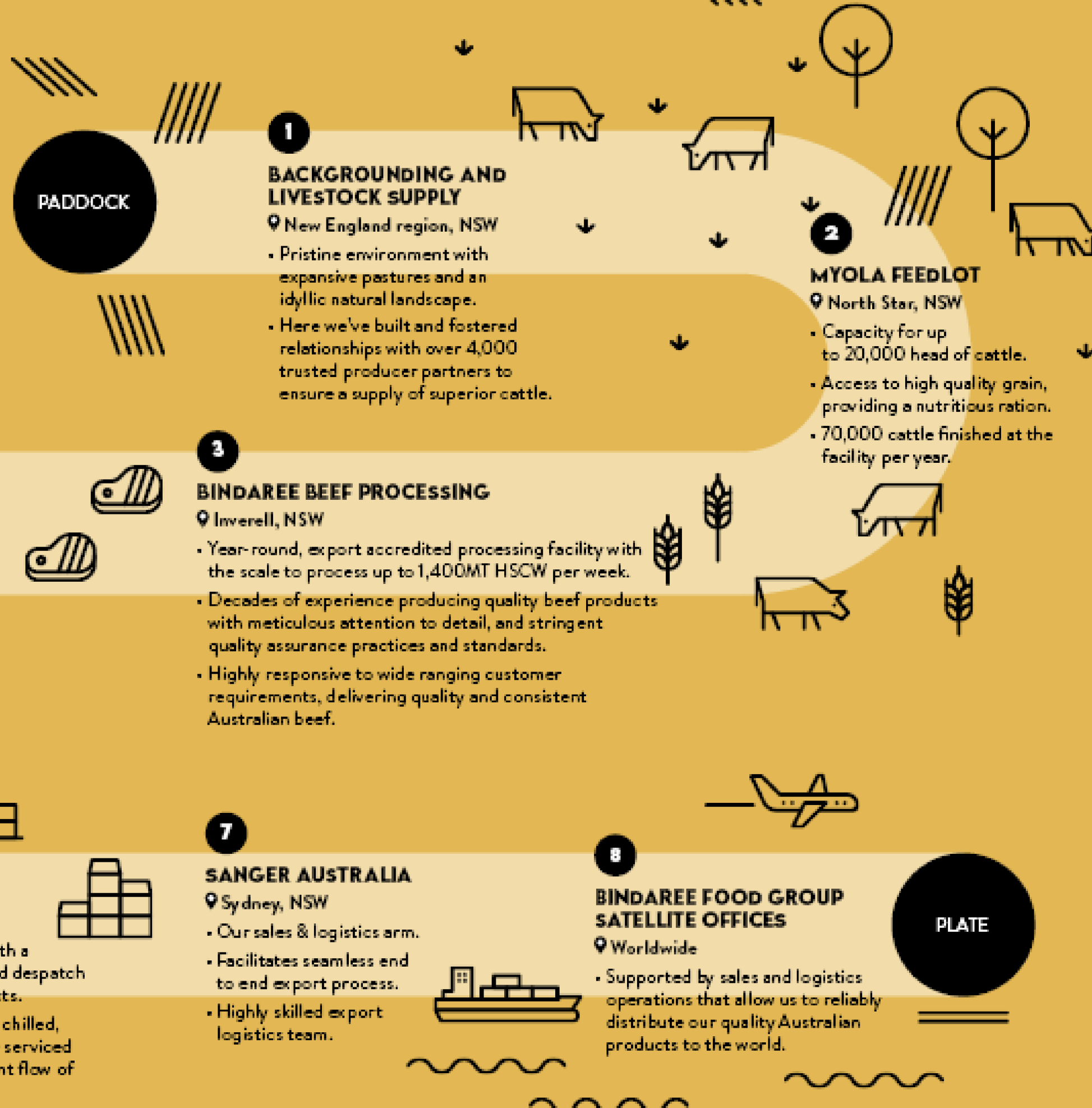
**Monbeef Processing** Acquired by Bindaree on 29 May 2023, our processing facility at Cooma uses the latest hot-boning technology to process quality beef and employs 81 team members. Given the acquisition date, we have not included the Monbeef facility in this report for FY 2023.

*Note: Team member numbers are as at 30 June 2023.*



# OUR INTEGRATED SUPPLY CHAIN

Bindaree Food Group is an integrated supply chain business. We use tailored solutions to deliver our consistent, quality Australian grown and processed beef from the paddock to your plate – wherever you are in the world.



## 1 BACKGROUNDING AND LIVESTOCK SUPPLY

- New England region, NSW
- Pristine environment with expansive pastures and an idyllic natural landscape.
- Here we've built and fostered relationships with over 4,000 trusted producer partners to ensure a supply of superior cattle.

## 2 MYOLA FEEDLOT

- North Star, NSW
- Capacity for up to 20,000 head of cattle.
- Access to high quality grain, providing a nutritious ration.
- 70,000 cattle finished at the facility per year.

## 3 BINDAREE BEEF PROCESSING

- Inverell, NSW
- Year-round, export accredited processing facility with the scale to process up to 1,400MT HSCW per week.
- Decades of experience producing quality beef products with meticulous attention to detail, and stringent quality assurance practices and standards.
- Highly responsive to wide ranging customer requirements, delivering quality and consistent Australian beef.

## 4 MONBEEF PROCESSING

- Cooma, NSW
- Year-round, export & halal accredited, hot-boning processing facility with the scale to process up to 1,000 cattle per week.

## 5 BINDAREE FOOD SOLUTIONS

- Burleigh Heads, QLD
- World class, retail ready production facility.
- Capability and capacity for customisation in retail packaging and food service solutions.
- Advanced automation across production lines.

## 6 FREIGHT ST WAREHOUSE

- Brisbane, QLD
- Logistic cold storage centre with a primary function to receive and despatch chilled and frozen meat products.
- Space for 3,400 pallets (1,600 chilled, 1,600 frozen & 200 dry goods) serviced by 6 loading docks for proficient flow of product movements.

## 7 SANGER AUSTRALIA

- Sydney, NSW
- Our sales & logistics arm.
- Facilitates seamless end to end export process.
- Highly skilled export logistics team.

## 8 BINDAREE FOOD GROUP SATELLITE OFFICES

- Worldwide
- Supported by sales and logistics operations that allow us to reliably distribute our quality Australian products to the world.

# SUPPLY CHAIN

Key suppliers of BFG include suppliers of cattle, grain and feed, machinery and equipment, fuel, logistics (transport), packaging, cold stores and professional services.

During the reporting year, BFG purchased cattle from over 700 vendors with most located in New South Wales and the remainder from Queensland.



# MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

Agricultural supply chains have been identified as carrying a risk of modern slavery due to their complex and seasonal nature. We note that, as an integrated supply chain business, we operate with less complexity and have greater visibility over our suppliers than others. However, we do acknowledge there is a heightened risk associated with unskilled and migrant workers, who are particularly vulnerable to exploitation. Labour hire and cleaning suppliers have been identified as higher risk areas within the industry and accordingly, we have focused on these areas.

BFG's processing operations are in Australia, which has a low prevalence of modern slavery according to the latest edition of the Global Slavery Index (2023), and our migrant workers are primarily sourced through the Pacific Australia Labour Mobility (**PALM**) scheme which is a highly regulated employment pipeline, subject to oversight from the Federal Government.

BFG also acknowledges the risks of operating in China; however, our supply chain within China is limited to professional services, logistics and warehousing. Whilst these areas are not completely risk free, we engaged with our China suppliers and assessed the risk of modern slavery to be relatively low.





# HIGHER RISKS WITHIN OUR SUPPLY CHAIN

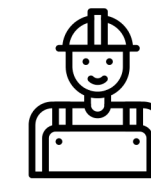
## CLEANING



The procurement of cleaning personnel through external cleaning suppliers usually presents a high risk, as the industry is typically heavily reliant on migrant workers who may be subject to exploitative workplace and recruitment practices. BFG mitigates this risk at its Inverell site by employing all cleaning staff directly, with such staff having designated roles within our relevant Enterprise Bargaining Agreement.

As part of our ongoing Modern Slavery due diligence we have engaged with the cleaning company that services our Burleigh Heads site and have reviewed their suite of policies that address Modern Slavery Risk within their operations and workforce. No issues were identified during this review.

## LABOUR HIRE



During the reporting period, BFG worked with two labour hire companies: the FIP Group (**FIP**) at our Myola, Inverell and Burleigh Heads sites, and Workforce Services at our Burleigh Heads site. We conduct due diligence against our labour hire companies to ensure they hold any licences required by state laws and are compliant with modern slavery principles.

The labour hire workers we engage through FIP are primarily under the PALM scheme, which is implemented by the Australian Government to deliver jobs for Pacific and Timor-Leste workers, enabling them to develop skills, earn income and support their families and communities back home. The well-being of participating Pacific and Timor-Leste workers is a central tenet of the PALM scheme and, in order to be eligible under the scheme, FIP has clear obligations to ensure workers are supported. BFG works closely with FIP to support workers in ensuring wages are paid correct and suitable accommodation is provided, noting they have the same workplace rights and protections as Australian workers. In addition, FIP is certified by SEDEX and Staff Sure.

As at the end of the reporting period, BFG had 254 team members engaged under the PALM scheme, with 208 at Inverell, 43 at Burleigh Heads and 3 at Myola.



# ASSESSING AND ADDRESSING MODERN SLAVERY RISKS WITH OUR SUPPLIERS

BFG continues to make progress in engaging with our suppliers to address modern slavery risks, including requiring new suppliers to respond to our modern slavery questionnaire before onboarding, and existing suppliers to update their responses annually. Our focus for the annual updates continues to be on Tier 1 suppliers with a spend threshold of \$50k or greater, meaning we sent our questionnaire to 429 existing suppliers in Australia (an increase from 370 in the FY 2022 reporting period).

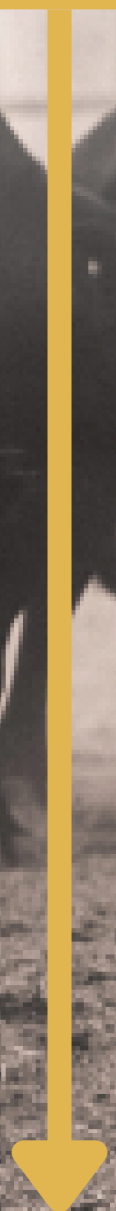
We also adapted our engagement strategy this year, by communicating with suppliers through their key relationship contacts within BFG, rather than through the legal team. This led to better engagement as suppliers were more receptive to the questionnaire and could raise questions with a familiar contact who had experience with their business operations.

For this reporting period, our questionnaire was modified to contain additional questions about the suppliers' knowledge regarding their own supply chains and internal modern slavery compliance mechanisms. This is the first time BFG had attempted to collect data about our suppliers' Tier 2 suppliers.

A key goal from our last reporting period was to increase engagement with our China suppliers. This reporting period, we developed a separate China-specific questionnaire in Mandarin, and worked closely with our Shanghai team to identify suppliers in China that exceeded our spend threshold. Our Shanghai team then contacted suppliers directly through WeChat to issue the questionnaire and explain the need for it, which led to greater engagement from these suppliers and a significant increase in response rate.



MODERN SLAVERY  
QUESTIONNAIRE





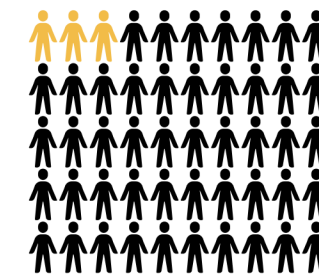
# ASSESSING AND ADDRESSING MODERN SLAVERY RISKS WITH OUR SUPPLIERS

Where BFG identified higher risk areas (cleaning, labour hire), there was a concentrated effort to ensure that suppliers in these areas responded to our modern slavery questionnaire and provided supporting documentation to illustrate their governance systems in dealing with modern slavery risk.

We continued to work with cattle producers to better understand our Tier 2 and Tier 3 supply chains (breeders, farmers, etc). We note that many of our cattle suppliers are small, family-run businesses with little to no employees and accordingly these operations present a low modern slavery risk. However, our engagement with these suppliers has been beneficial in raising awareness of modern slavery risks.

We assessed that many of the larger companies, professional service firms and government agencies in our supply chains presented a low risk for modern slavery, due to their robust governance frameworks (many of which were supplied in response to our questionnaire) and the office-based nature of their work.

During this reporting period, three of our suppliers identified, through their responses to our questionnaire, an awareness of a modern slavery incident within their supply chains. We engaged with each of these suppliers to seek clarification about the incidents and the actions that were undertaken to address them. Ultimately, we were satisfied that none of these suppliers had identified an actual incident of modern slavery in their own operations and were implementing satisfactory processes to address the risks of such incidents occurring.





# ASSESSING AND ADDRESSING MODERN SLAVERY RISKS INTERNALLY

## POLICY AND PROCEDURE

During this reporting period, BFG has made significant progress in updating policies and actions to assist in addressing modern slavery risks associated with our operations and supply chains. These include reviewing and, where necessary, updating core policies, including those set out on this page. Each of these policies was reviewed and updated in April 2023.

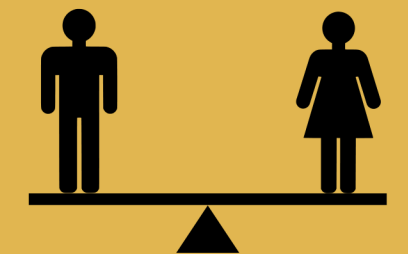
In addition, during this reporting period we have focused on including modern slavery obligations in contracts with new suppliers or in renewing existing suppliers. These contractual obligations require suppliers to comply with certain standards of behaviour relating to modern slavery principles, and to provide information to us where required.



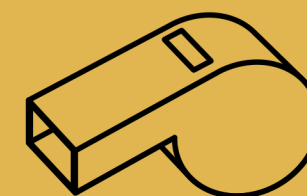
Modern Slavery Policy



Workplace Grievance  
Policy



Anti-Discrimination Policy



Whistle-blower Policy



Anti-bribery and  
Corruption Policy



Ethical Sourcing and Social  
Accountability Policy



# ASSESSING AND ADDRESSING MODERN SLAVERY RISKS INTERNALLY



## TRAINING

BFG has a robust training program to ensure that all team members understand our policies and their rights and obligations under them, allowing individuals to better identify and report on modern slavery incidents. Training on BFG policies, including in relation to whistle-blower and grievance mechanisms, is mandatory for all team members as part of our onboarding process, whether done online for our corporate team members, or in person for our production team members.

In addition, we require team members to complete training updates on a regular basis through our online training platform “ELMO”, which involves interactive quizzes.



# ASSESSING EFFECTIVENESS



In implementing our modern slavery strategy to date, we have focused on increasing response rates to our modern slavery questionnaire, in order to better understand the approaches, policies and processes of our suppliers in combatting modern slavery.

Our attempts to increase response rates to our questionnaire have been very successful, with a 50% increase in responses from our Australian suppliers and a 700% increase in responses from our Chinese suppliers from the last reporting period (FY 2022) to this reporting period (FY 2023). The significant increase from our Chinese suppliers reflects the low response rate in the past, as well as our targeted efforts during this reporting period.

Moving forward, BFG will develop a more standardised approach with key performance indicators to assess the effectiveness of our actions. These may include measuring the percentage of our own precedent contracts with modern slavery clauses included, measuring the percentage of supplier contracts for which we negotiate the inclusion of modern slavery clauses, and measuring the completion rates for modern slavery awareness training.

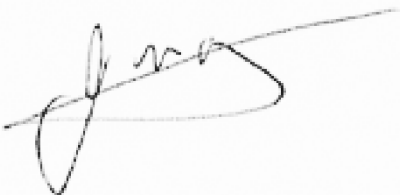
As noted previously, we will also engage with suppliers for the Monbeef business, which was acquired just prior to the end of this reporting period.



# CONSULTATION WITH CONTROLLED ENTITIES

There are 13 subsidiaries within the BFG group, of which Yolarno Pty Ltd is the parent company. These subsidiaries do not have separate governance bodies, with the management and board of Yolarno Pty Ltd having oversight and control over the entire group. We consider that the engagement process established in putting together this Statement was a sufficient means of consultation with the controlled entities within the BFG group.

This Statement was approved on 19 December 2023 by the Board of Yolarno Pty Ltd in its capacity as principal governing body of Yolarno Pty Ltd and the BFG group.

A handwritten signature in black ink, appearing to read "John Kotzur".

John Kotzur  
Acting Chairman





# PEOPLE PASSION FLAVOUR

