



Tattarang

Modern Slavery Statement

FOR THE FINANCIAL YEAR
ENDING 30 JUNE 2020



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Introduction

More than most organisations, the Tattarang entities 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 of its forms. We are inspired by and driven to action through the critical work led by Minderoo Foundation, the global philanthropic organisation we are privileged to work with and support.

In particular, it is the vital work of Minderoo's Walk Free initiative that continues to play a central role in advocating for the Modern Slavery Act across the country and for similar reforms around the world towards its mission to end modern slavery in our generation.

It is a hideous fact that modern slavery affects every country and most supply chains, regardless of size, population, or wealth. Slavery is endemic in nations with seemingly strong laws and judicial systems with safeguards and checks and balances. We know there are critical gaps, particularly for the most vulnerable. Serious action is desperately needed.

Tattarang is a proudly Western Australian fast-growing group of operating businesses and investments, some of which have only recently been acquired or started. Accordingly, a range of our processes are in formative stages, or there are gaps, as indicated in this statement.

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

I am proud of everything the Tattarang team has achieved this year. An example of this is our Talent Beyond Boundaries program at Harvey Beef which is a case study in this statement.

Tattarang joins the Australian business community in making significant commitments in the first wave of modern slavery reports. As Dr Andrew Forrest AO said, "We are all going to have slavery in our supply chains no matter how good we think our corporate social responsibility is. If we focus on it then we can identify it and root it out".

At Tattarang we are committed to doing so.

Signed by



Andrew Hagger
Tattarang CEO

31 March 2021

Approval

This joint statement has been published on behalf of four entities - Tattarang Pty Ltd, Tattarang Capital Pty Ltd, Forrest & Forrest Pty Ltd and Harvest Road Group Pty Ltd to meet their reporting requirements under the Modern Slavery Act for the year ended 30 June 2020. These four entities and those entities which they respectively control are collectively referred to in this statement as Tattarang Group. Where reference is made to 'Tattarang', this refers to just three of these entities, namely - Tattarang Pty Ltd, Tattarang Capital Pty Ltd and Forrest & Forrest Pty Ltd and those entities which they respectively control.

Tattarang Group is one of Australia's largest private investment groups, with approximately \$26bn in assets under management, comprised of a diverse number of operating businesses, as well as a portfolio of minority-stake investments. Our portfolio of operating businesses spans agri-food, energy, resources, property, hospitality and sport.

Harvest Road Group Pty Ltd, Tattarang Capital Pty Ltd and Forrest & Forrest Pty Ltd are entities managed within Tattarang Group, which each had in excess of \$100m consolidated revenue in the relevant period and are therefore reporting entities under the Modern Slavery Act in their own right. This joint statement sets out details of operations across Tattarang and Harvest Road Group, their supply chain, and measures taken to address risks of modern slavery in line with the criteria set out within the Commonwealth Guidance for Reporting Entities. This joint statement also addresses the activities of other entities which sit within Tattarang Group but are not reporting entities in their own right (see next page).

In addition to Tattarang Group's portfolio of operating businesses, Tattarang Group holds investments in a range of companies operated independently. In line with the reporting criteria, we do not individually monitor and report on these investments in the same way as those that are operated within Tattarang Group, so these companies are not included in this statement. However, where appropriate we do consider

modern slavery risks at a high level throughout our engagement with the businesses in which we invest, and where appropriate provide commentary on this within our statement.

Unless expressly stated otherwise, the content provided relates to Tattarang Group including all operating businesses within its portfolio which includes Harvest Road Group Pty Ltd, Tattarang Capital Pty Ltd and Forrest & Forrest Pty Ltd.

Consultation with all reporting entities and entities owned/controlled by reporting entities

The boards of Harvest Road Group Pty Ltd, Tattarang Capital Pty Ltd and Forrest & Forrest Pty Ltd have approved and authorised this statement. These boards have been assisted by the work of the senior leaders and staff, and the relevant central operations functions, including the finance, people & culture, and legal teams. These functions were consulted to understand each business' approach to assessing, addressing and remediating modern slavery risks. Members of Harvest Road Group Pty Ltd, Tattarang Capital Pty Ltd and Forrest & Forrest Pty Ltd leadership teams participated in the preparation of this statement.

This statement is signed by a director of each of Tattarang Pty Ltd, Harvest Road Group Pty Ltd, Tattarang Capital Pty Ltd and Forrest & Forrest Pty Ltd pursuant to section 14(2)(e)(i) of the Modern Slavery Act.

Signed by



John Hartman
Director

31 March 2021

Our structure, operations and supply chains



Who we are

We are a proudly Western Australian investment group with assets in agri-food, energy, resources, property, hospitality, lifestyle, and sport.

Whilst the Tattarang Group is diverse in both businesses and talent, it is supported by clear management practices and principles that, among other imperatives, are designed to ensure that our values are consistently upheld across the group.

If we combine ethical business practices with macro philanthropy, we create an overwhelmingly powerful force for common good.

Andrew and Nicola Forrest

Andrew and Nicola



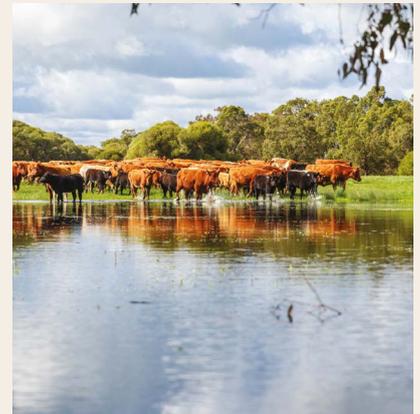
Our operations

The Tattarang Group includes the following:

Harvest Road Group is primarily an agricultural business producing a portfolio of fine food brands for domestic and international markets, exporting to over 40 countries. This comprises the following:

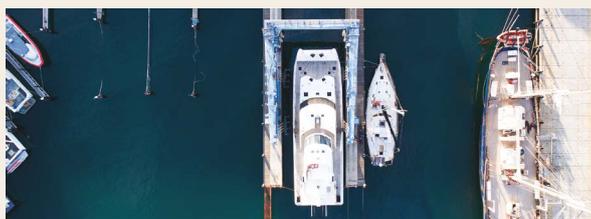
Harvest Road Beef: a vertically integrated beef business, spanning six cattle stations and 1.3 million hectares of pastoral properties in Western Australia and a meat processing plant located in Harvey, Western Australia. Harvey Industries Group, Harvest Road Pastoral and Koojan Downs sit within Harvest Road Beef.

Harvest Road Oceans: under the brand Leeuwin Coast and consists of three aquaculture farms producing Akoya, Mussels and Oysters.



Fiveight owns, invests in, develops and manages residential, commercial and industrial property across Australia. Its model is based on the strategic ownership of assets with the potential to generate returns and also benefit the communities around them.

Z1Z invests in lifestyle services, products and experiences that bring the unique essence of Australia to our patrons. The Z1Z brand mark came from the original and literal brand of Minderoo, used on stock and horses.



As one of Western Australia's premier marine maintenance companies, **SFM Marine** services cover lift and launch, boat engineering, fabrication, boat building, painting, antifouling, prop-speed vessel detailing and marine training. SFM Marine has operations in Henderson and Fremantle, Western Australia.

Wyloo Metals conducts exploration, develops and invests in the next generation of mines. It manages a diverse portfolio of wholly owned exploration projects and cornerstone investments in both public and private companies across Western Australia and New South Wales, with recent acquisitions in Canada.



Squadron Energy invests in initiatives, research, technologies and projects that will support and accelerate the transition to a low carbon economy. It is focussed on development projects across solar energy and battery storage, natural gas, wind power generation, energy-related infrastructure, including LNG importation and the development of a dual-fuel (gas and green hydrogen) power station at Port Kembla, New South Wales.

Our Values and Commitment to ending modern slavery

At Tattarang Group, our 10 values are at the heart of everything we do. They drive our culture and philosophy and underpin our approach to conducting business.

We are committed to acting ethically and with integrity across all aspects of our business. We strive to uphold and protect the rights of all of those who work for, or on behalf of, Tattarang and all entities within the Tattarang Group. We are also committed to protecting and respecting the rights of people who may be impacted by our activities, including those in our supply chains.

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 this risk. We also acknowledge that we have more work to do to formalise and fully embed these systems and processes.

The Tattarang Group went through a period of significant growth during the reporting period. This growth included a number of acquisitions as well as organic growth across our central operations teams.

During this period of growth, we took steps to amalgamate our key business functions and processes and action to understand the range of modern slavery risks we face across our businesses.

We also started to establish formal business structures to manage these risks, drawing on the knowledge and understanding of modern slavery from the Minderoo Foundation where necessary. However, we recognise that during the reporting period many of our key controls and approaches to managing modern slavery risks were not formalised, codified and consistently implemented across our diverse portfolio of businesses.

We would have liked to have moved faster. The growth trajectory of the Tattarang Group, as well as the disruptions to business resulting from the COVID-19 crisis, meant we were unable to implement all actions over the reporting period.

Recognising the progress we have made, we have acknowledged and made a distinction throughout the statement between the actions and strategies implemented during the reporting period, and those we will implement moving forward.

Impacts of COVID-19

The pandemic has impacted supply chains around the world and exacerbated the risks of modern slavery for vulnerable workers. The Tattarang Group was affected by the impacts of COVID-19, much like most businesses operating around the world. Controls were implemented to protect employees and to enable work to proceed in a COVID-safe environment.

As with many organisations, COVID-19 related challenges impacted our ability to progress with our modern slavery risk management activities during FY20. Across our businesses, significant management resources were diverted to our COVID-19 response, which limited our capacity to move as fast as we would have liked in developing and implementing policies and controls to address and manage modern slavery risk. More specifically:

- **Tattarang** had scheduled two supplier audits for high-risk suppliers, which could not go ahead due to the COVID-19 restrictions on travel. These audits will be undertaken (if still relevant) as soon as safe, international travel is possible.
- **Harvest Road Group** was unable to conduct scheduled site visits to our labour recruitment agencies. These agencies did however participate in our Supplier Self-Assessment Questionnaire process. Harvest Road Group's use of labour hire agencies was also reduced as a result of COVID-19 travel restrictions.

Our Values

Courage & Determination

NEGU —we never ever give up.

Empowerment

Go to your leader for advice, not permission.

Enthusiasm

Be the most positive person in the room.

Family

Support each other, always be kind.

Frugality

Think of ways we can do things better, faster, cheaper, safer.

Generating Ideas

Always be on the lookout for breakthroughs.

Humility

Be vulnerable, take risks to trust others.

Integrity

Do what you say you're going to do.

Safety

Look out for your mates and yourself.

Stretch Targets

Always be uncomfortable with your level of challenge.

Our employees

Tattarang's workforce is comprised of 202 staff working across each of the operating businesses. 85 of these employees sit within the central operations team while 118 employees work within the operating businesses. Harvest Road Group employs a total of 745 employees within their operating businesses and support departments.

99.9% of the Tattarang Group's workforce is based in Australia and employed in compliance with local laws and regulations. Our employment terms and conditions of employment are underpinned by the Fair Work Act and the National Employment Standards (NES).

Our contracts of employment set out the minimum terms and conditions of employment, in line with the NES, including:

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

The Tattarang Group's workforce includes full time, part time, casual and fixed term contract employees. The majority, 82%, are full time employees as shown in the table below.

Tattarang	Full time	Part time	Fixed term contract	Casual	Total
Fiveight	6	-	-	1	7
SFM Marine	21	-	-	1	22
Squadron Energy	4	-	-	-	4
Wyloo Metals	8	-	-	-	8
Z1Z	60	-	15	2	77
Central Operations	73	9		2	84
TOTAL	172	9	15	6	202

Harvest Road Group	Full time	Part time	Fixed term contract	Casuals	Total
Harvest Road Group	19	-	-		19
Harvest Road Beef	568	2	-	134	704
Harvest Road Oceans	16	1	-	5	22
TOTAL	603	3	-	139	745

COMBINED TOTAL	775	12	15	145	947
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Case Study: Pathway to employment for refugees.

Harvey Beef engaged with Talent Beyond Boundaries, a program that connects displaced skilled refugees to employers in Australia, Canada and UK.

In December 2019, Harvey Beef was one of 21 employers and six industry networks to sign a pledge to consider refugee talent as part of our international recruitment strategy. We recognise that in addition to managing the risk of modern slavery in our operations and supply chain, we can also have a positive impact by providing employment opportunities to vulnerable groups.

We have so far placed two Skilled Meat Workers (butchers) through the program that relocates refugees from Jordan and Lebanon.

Refugees are particularly vulnerable to human trafficking and other forms of modern slavery. This vulnerability begins when fleeing situations of violence or conflict and persists as refugees are dislocated from community, family and legal support. Refugees are typically without access to legitimate employment, legal status and social protections. Gaps in laws, policies and practices that intend to protect refugees from abuse can leave these individuals vulnerable to exploitation by unscrupulous recruiters, employers and traffickers.¹

We are proud to support the work of Talent Beyond Boundaries as they create legitimate employment and migration opportunities for refugees, and we benefit by filling skilled vacancies within our organisation.



••
Ali and Hussein Wawi (part of the Talent Beyond Boundaries Program) with Jane Kelly at Harvey Beef. Photo Credit: Briana Fiore

Our supply chain

The Tattarang Group’s supply chain encompasses a wide and varied network of over 2000 Tier 1 suppliers. We have focussed on these direct suppliers as a priority in our modern slavery risk management activities to date. Whilst we source from suppliers across 30 different countries, 97% of our spend is with Australian headquartered businesses. Where possible, we prioritise sourcing from local suppliers.

Across the Tattarang Group, our main categories of spend include agricultural products, construction, consultancy services, energy, freight and logistics, fuel, legal services, rent and property costs, and employee contributions.

Figure 01 shows that 83% of our non-Australian spend (3% of our total spend) was with Argentina, Norway, Hong Kong and USA domiciled suppliers in FY20. The remaining 17% was sourced from a wide range of countries including Canada, Singapore, New Zealand, Uruguay, South Korea, Fiji, Netherlands, China, United Kingdom, Cayman Islands, Spain, Italy, India, Brazil, Ireland, British Virgin Islands, France, Germany, Thailand, Japan, Indonesia, Colombia, Samoa, South Africa, and Denmark, all comprising 0.1% of spend or less each.

Figure 02 outlines the amount of procurement spend across each of the entities within the Tattarang Group.

Figure 01: Non-Australian supplier spend by country

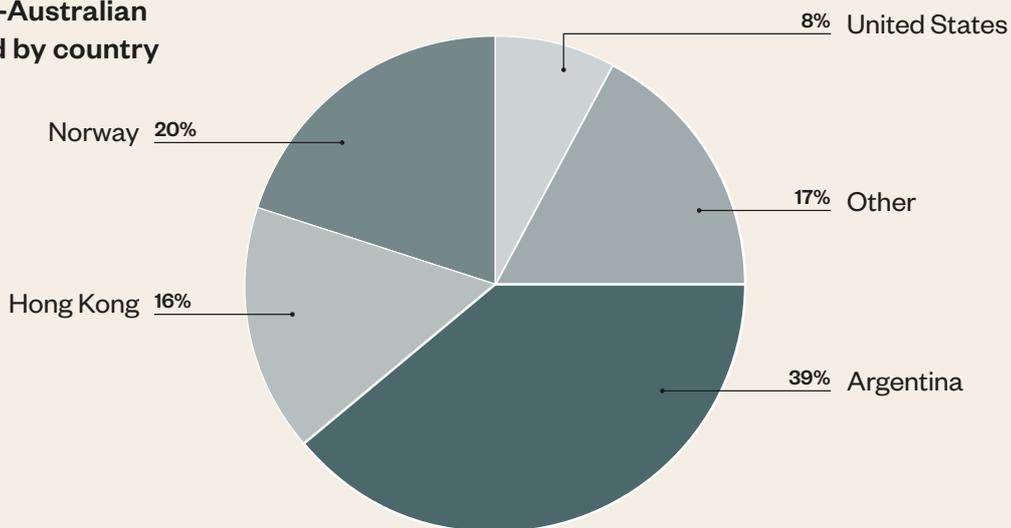
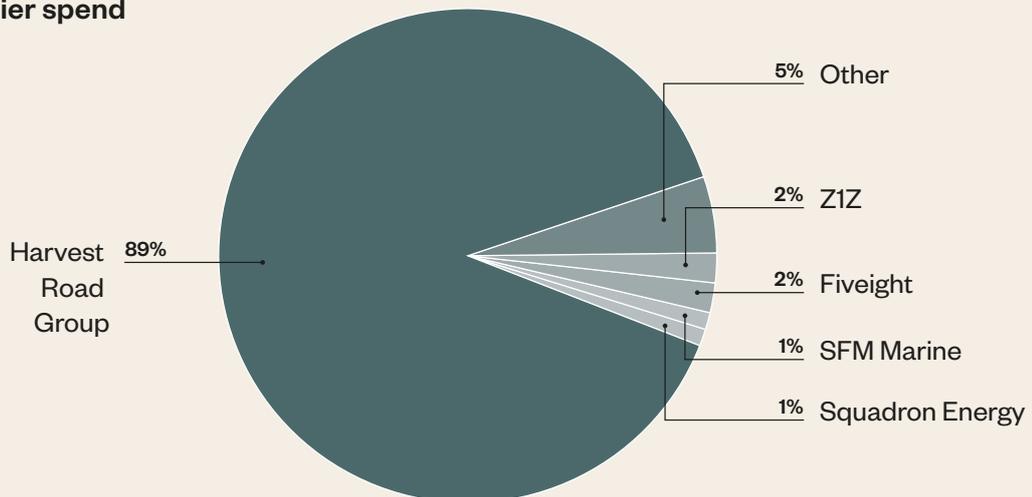


Figure 02: Supplier spend by entity



Supply Chain (Tier 1)

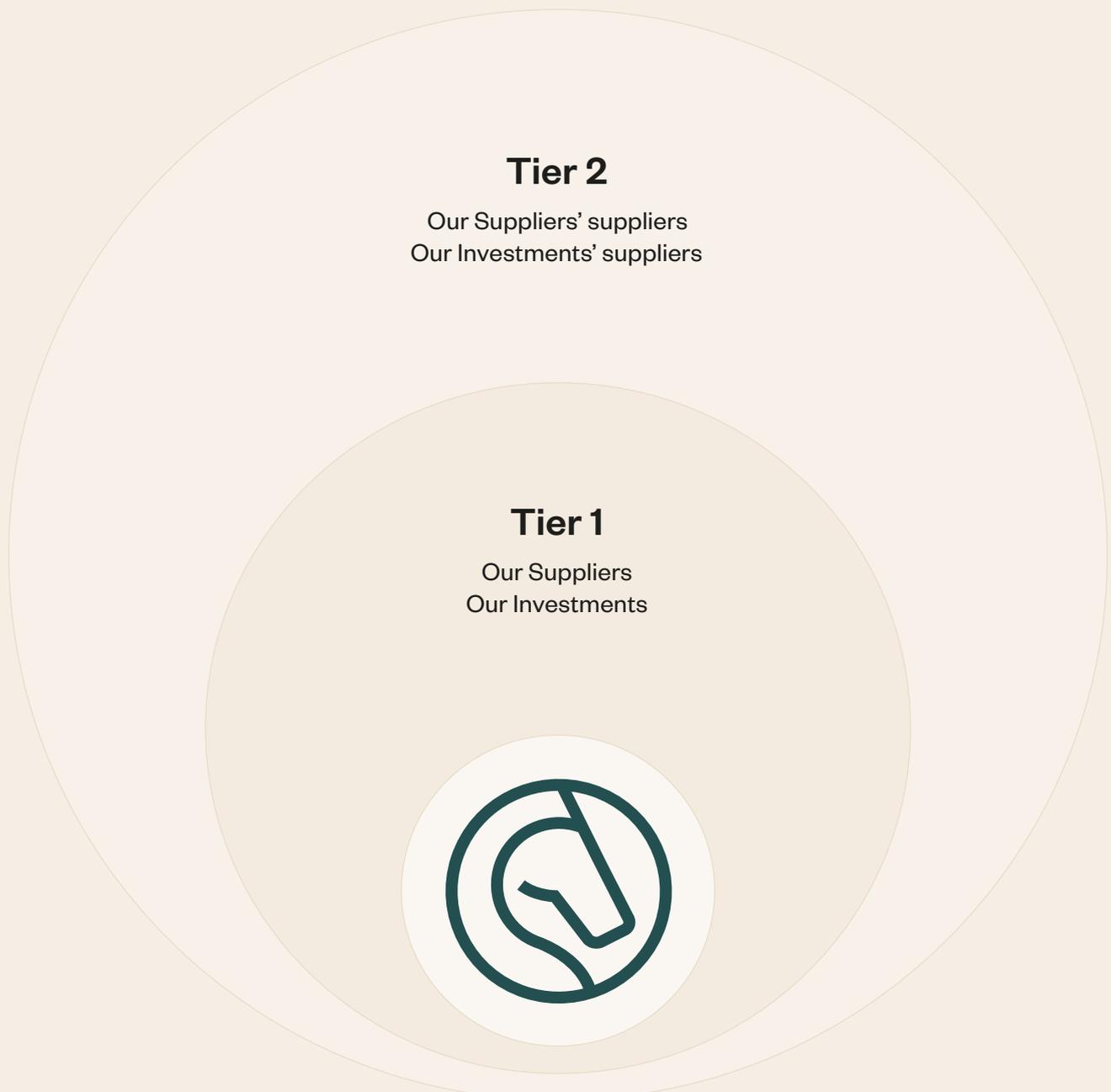
Our supply chain encompasses:

- Suppliers that we purchase goods or services from.
- Investments (companies and managed funds that we invest into).

Extended Supply Chain (Tier 2)

- Our suppliers' suppliers.
- Our investees' suppliers.

We acknowledge that for each of these categories, a slightly different approach is needed to identify, monitor, and address the risk of modern slavery occurring in our operations and supply chain.



Our approach to assessing and addressing risk: Modern Slavery Framework

The Tattarang Group is committed to continuous improvement in our approach to addressing modern slavery, guided by our Modern Slavery Framework. This Framework was designed during the reporting period. It is currently being adopted and implemented across the Tattarang Group. We are committed to full implementation in FY22.

In the past two years, Tattarang Group has gone through a period of growth, rising from 750 employees in 2018 to over 947 employees in 2020. We have implemented new systems to accommodate this growth including across our IT, people and culture and finance functions. We also identified a need to establish a new risk management framework as well as a procurement function and associated systems. These new systems and processes accord with our commitment to addressing modern slavery.

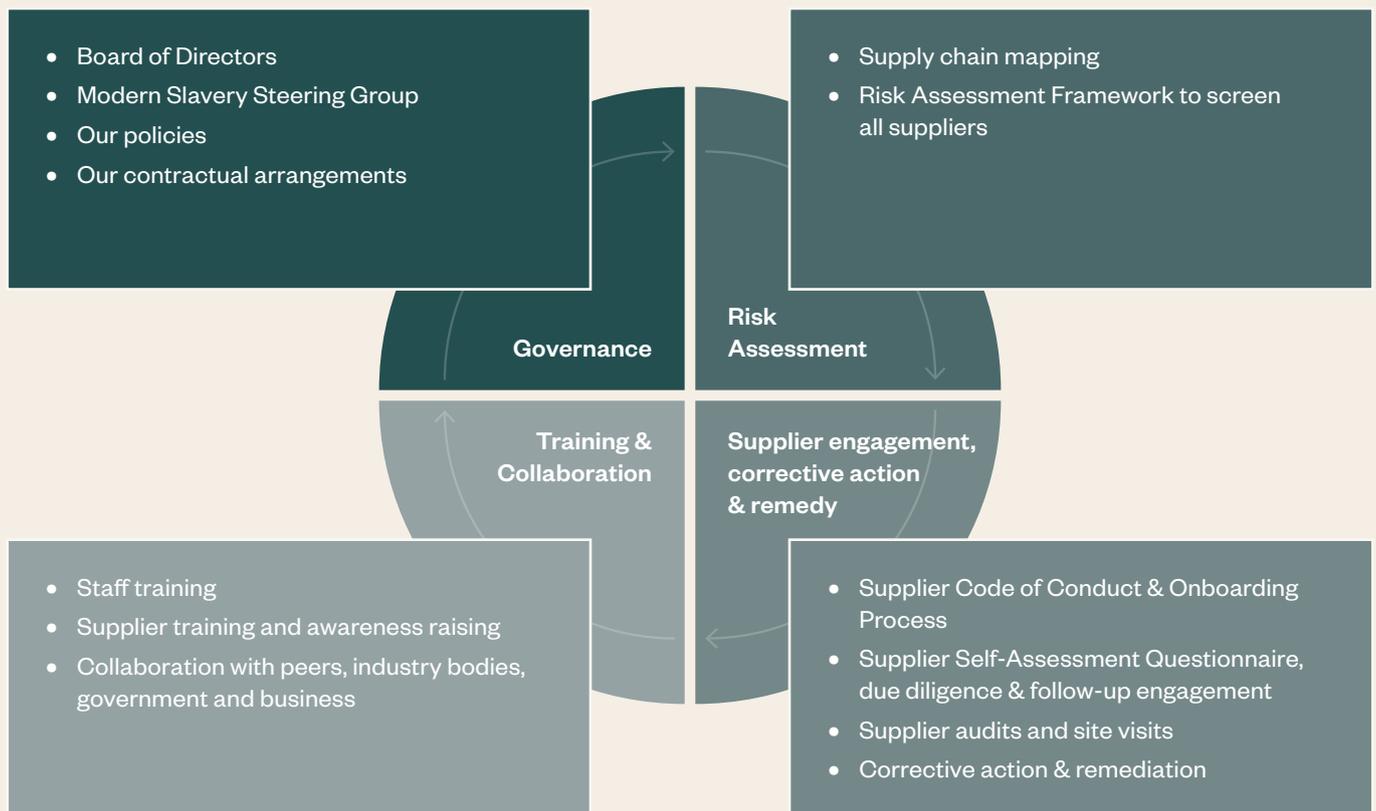
We recognise that further enhancements will be required as we continue to grow and that we must continually strengthen them in order to improve our effectiveness at combatting modern slavery.

Our Modern Slavery Framework comprises four key areas of focus and has been adopted subsequent to the reporting period.

- **Governance**
- **Risk Assessment**
- **Supplier Engagement, Corrective Action & Remedy**
- **Training & Collaboration**

We have summarised below the key elements of each of the four quadrants of our framework.

Figure 03: Modern Slavery Framework



Governance

The day-to-day management of modern slavery risk sits within the central operations functions of Tattarang and Harvest Road Group, namely the finance, people & culture and legal teams. While we are still in the process of formalising specific responsibilities, management teams are responsible for implementing modern slavery risk management into existing business processes and systems and ensuring that all relevant policies and procedures are adhered to.

Our multidisciplinary Modern Slavery Steering Group is responsible for implementing our Modern Slavery Framework and monitoring progress. This includes discussing modern slavery risks, incidents and responses, identifying improvement opportunities and coordinating the implementation of management and mitigation strategies. The Steering Group has a cross disciplinary membership with access to additional support from the Minderoo Foundation's Walk Free initiative as required. The Steering Group reports to senior leadership who report to the board of Tattarang.

Policy framework

Tattarang

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

- Our **Responsible Investment Principles**² guide our approach to sustainable investment, specifically the selection, appointment, managing and monitoring of investments.
- Our **Modern Slavery Policy**³ outlines and communicates our commitment to respecting and upholding the rights of those who work for, or on behalf of, Tattarang, including our employees, contractors and suppliers.
- Our **Code of Conduct**⁴ is a reflection of our values and broader cultural and behaviour expectations we have for others. The Code articulates how we interact with each other, how we run and govern our organisations, and the

standards to which we hold ourselves and one another to account in everything that we do.

- Our performance expectations are communicated to our suppliers via our **Supplier Code of Conduct**⁵. This includes our expectation for suppliers to assess and address modern slavery risks and potential impacts within their own operations and supply chain.
- Our **Whistleblower Policy** outlines our approach to identifying, investigating and responding to Whistleblower disclosures. The intent of the Policy is to encourage employees, contractors and suppliers to raise concerns without fear of reprisal, which assists us to identify misconduct, wrongdoing or illegal acts, such as exploitative labour practices.
- If it is identified that an operating business within Tattarang has caused, contributed or is directly linked to instances of exploitation, our **Remedial Action Plan**⁶ provides practical guidance on how to respond and remediate. This takes a victim-centred approach and recommends the use of collective leverage to achieve the best outcomes for victims and prevent these harms from reoccurring.
- Our approach to ethical procurement practices are outlined in our **Procurement Policy**⁷. Our purchasing practices are aligned with our values, including our approach to ethics, transparency, modern slavery, and indigenous procurement.

Harvest Road Group

The Harvest Road Group has its own range of policies to support the management of modern slavery risks detailed below. Within the Harvest Road Group, Harvey Industries Group has its own policies reflecting the longer history of its business, the consequential maturity of its risk management approach, as well as the higher inherent modern slavery risk associated with its operations. During the reporting period, the need for consistency across the Harvest Road Group and the Tattarang Group was recognised. We are committed to standardising policies and procedures governing the entire Harvey Industries Group and harmonise these policies with the Harvest Road Group during the FY21 reporting period.

- The **Code of Conduct** establishes the standards of personal and corporate conduct for all employees, contractors, suppliers and business partners. This Code outlines the company's commitment to respecting and upholding the human rights of every individual and that the company will seek to ensure it is not complicit in human rights abuses carried out by others. The Code explicitly references indicators of human rights abuses, including forms of modern slavery such as forced labour, child labour, human trafficking and bonded labour.
- The **Employment Conditions Policy** outlines the responsibility of the company to provide the best possible working conditions for all of its employees. It aims to provide the most appropriate information to each individual for their position requirements and includes sections regarding probation, remuneration, hours of work, attendance, corrective action, meal breaks, superannuation, training and development. Although this policy doesn't directly talk to modern slavery, the requirements address the associated common risks.
- The **Recruitment and Selection Policy** provides the framework within which management and staff appoint the most capable people to roles across the organisation, specifically within the legal bounds of working age. The policy assists staff to recruit the person whose competencies best match the job requirements, understand the Equal Opportunity Legislation and align to the Company's desire to develop existing employees. The policy includes the additional requirement that children under the age of 15 will not be employed to work at the Harvey Plant and children under 16 years of age will not be employed to work on the Slaughter Floor.
- The **Workplace Discrimination and Harassment Policy** outlines the requirement of all staff to treat others with dignity, courtesy and respect. The policy names unacceptable workplace conduct in line with legislation including the Australian Human Rights Commission Act. This includes discrimination, racism, bullying, sexual harassment and victimisation. An Employee Assistance Program is also offered to employees within this policy.
- The **Whistleblower Policy** is one of a number of policies and codes that promotes a culture of compliance, honesty and ethical behaviour. The Policy applies to all staff, including Directors, Managers, staff, contractors and consultants across the business and sets out the minimum requirements for all staff. Examples of wrongdoing include a breach of other policies, a breach of regulations or laws, illegal activity, impeding internal or external audit processes and dishonest or corrupt behaviour. Although human rights or modern slavery is not explicitly mentioned in the policy, the policy provides a mechanism through which concerns on these issues can be reported.
- The **Ethical Sourcing and Modern Slavery Policy**⁸ sets out the minimum requirements expected of all suppliers. Based on the principles of the Ethical Trading Initiative (ETI) and International Labour Organisation (ILO) Conventions, it outlines the commitment of the Harvest Road Group to ensure all goods and services are sourced in a responsible manner. The Policy aims to work with suppliers to improve their social and environmental practices, explicitly pointing to risks surrounding modern slavery.
- Our approach to ethical procurement practices are outlined in our **Procurement Policy**. Our purchasing practices are aligned with our values, including our approach to ethics, transparency, modern slavery, and indigenous procurement.

Contractual arrangements

In conjunction with establishing a procurement function across the Tattarang Group, we identified the requirement to consistently apply standardised terms & conditions for our suppliers, including clauses relating to identifying and managing modern slavery risks. Standardised terms & conditions will be implemented as part of the roll-out of our new purchase order system in FY21 and FY22. Our legal team is also conducting a broad review of our contract templates to ensure clauses addressing modern slavery risks are included.

Risk assessment

Understanding our risk profile helps us to prioritise our risk management activities across our operations, investments and supply chain. We regularly review our risk profile to reflect this.

During the reporting period, we conducted a risk assessment of our suppliers using our **Risk Assessment Framework (Figure 04)**. The Framework uses Walk Free’s Global Slavery Index and other data sources, to analyse sector, product/ service and country risk and provide a score of low, medium or high risk for each supplier. The Risk Assessment Framework was used to determine an overall modern slavery risk rating for all suppliers providing goods and/or services to the Tattarang Group based on six months of procurement data. This was then used to inform further due diligence activities.

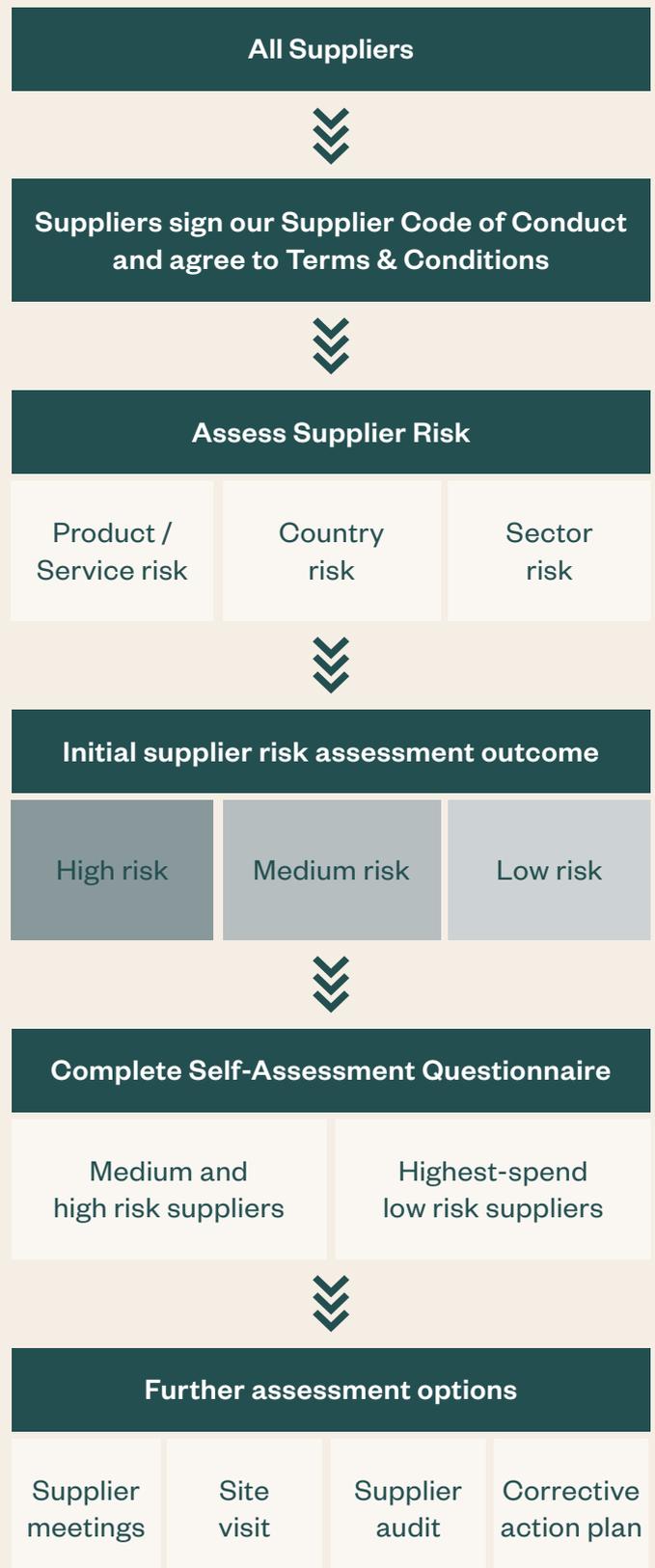
This assessment was useful in understanding the level of modern slavery risk across Tattarang Group’s suppliers. However, we wanted to strengthen this assessment and use the same methodology to assess the inherent risks in our operating businesses and investments. We engaged an independent consultancy to strengthen our risk assessment process and undertake a risk assessment of our investments and supply chain, using our FY20 procurement data. The assessment considered the following factors to form an overall assessment of modern slavery risk:

- **Country risk:** Country risk is determined by a range of internationally recognised human rights databases, indexes and reports, for example the Global Rights Index, the International Labour Organization, and the World Bank, to assign risk ratings to each country within the operations and supply chains within scope.
- **Industry risk:** Industry risk is based on an assessment of the likelihood and impact of known modern slavery risk factors for both operations and supply chains, for example labour type, employment type, and so on.
- **Industry controversy assessment:** For each relevant industry, a media and literature review was conducted to determine whether any controversies relating to modern slavery risks had occurred in the last 10 years within the industry.

Each supplier is then allocated a risk score and corresponding risk rating of either low, medium-low, medium, medium-high and high risk.

We included our findings from this assessment in the “Key Risks and Our Response” section of this statement.

Figure 04: Risk Assessment Framework



Case Study: Tackling risks in Global Rapid Rugby's procurement

Global Rapid Rugby (GRR) has been identified as the entity within Tattarang with the greatest modern slavery risk within its supply chain.

Approximately 48% of Tattarang's "high risk" suppliers provide goods and/or services to rugby. Due to the locations of its FY20 competition, GRR was often required to procure goods and services from overseas vendors when hosting sporting and other entertainment events. The types of goods and services procured included event management, catering, cleaning and security services, facilities, merchandise and marketing. Our updated risk assessment, completed following the end of the reporting period, provided similar outputs. In response to the risks identified, we issued SAQs to our highest risk suppliers, including several of GRR's merchandise suppliers, and planned a supplier audit. No instances of modern slavery or labour exploitation were identified during the reporting period through our due diligence activities. Recognising the higher level of risk that is associated with these products and services, we have identified the need to conduct enhanced due diligence on these types of suppliers in the future.. Should potential impacts be identified in future, Tattarang will work alongside suppliers to provide remedy to those affected and to ensure changes to existing processes and systems are made.

We are committed to building awareness and capacity within our rugby operating businesses to mitigate modern slavery risks. As such, we will develop modern slavery training for the management team to raise awareness and build capacity to identify and address modern slavery risks. We will provide training to all rugby staff and those involved in management of offshore events or those involved in hiring staff, contractors, goods and services for events held offshore.



..
Kyle Godwin of the Western Force runs with the ball during the round seven Super Rugby AU match between the Western Force and the Waratahs in August 2020 in Gold Coast, Australia. Photo credit: Chris Hyde/Getty Images.

Investments

Tattarang Group believes in investing for sustainable growth and pursues opportunities with a long-term investment horizon. ESG considerations have always been at the forefront of our investment decision-making. However, during the reporting period we recognised the need to formalise our approach, and set out to develop a set of Responsible Investment Principles (Principles) to be implemented in FY21.

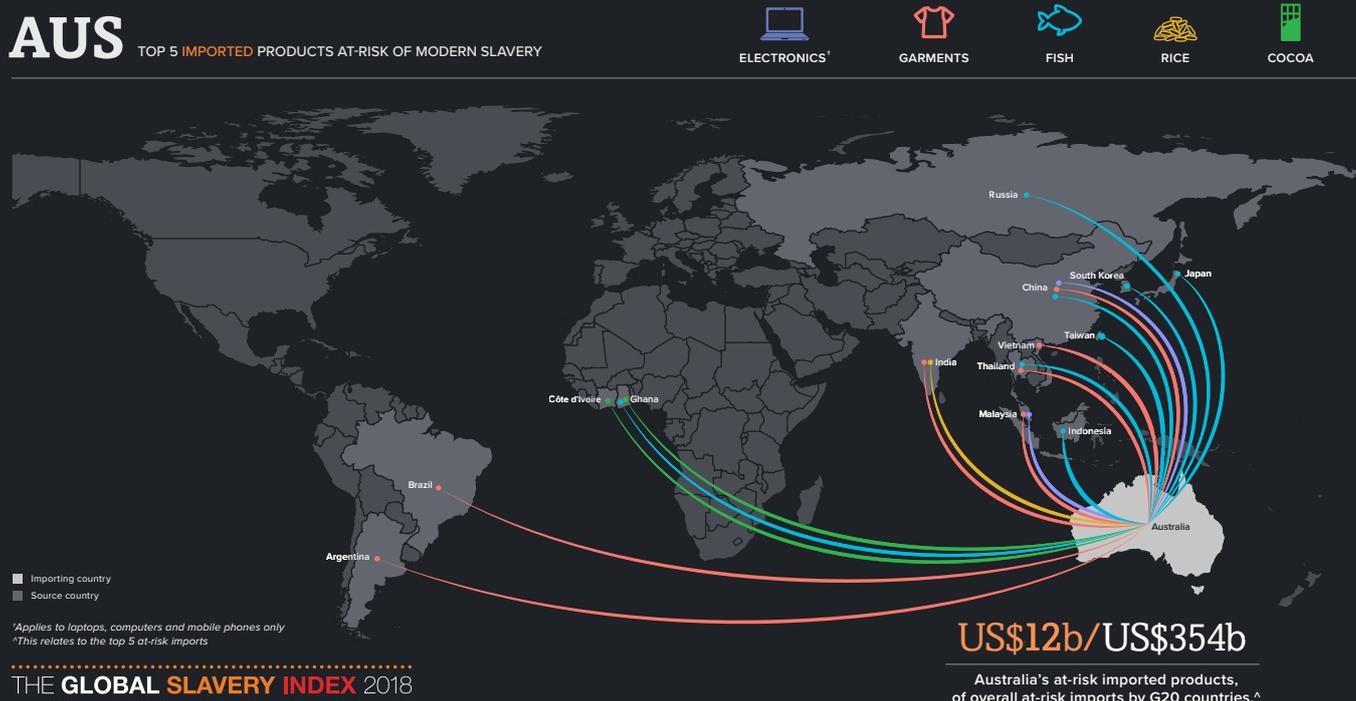
The Principles will guide our approach to sustainable investment, specifically the selection, managing and monitoring of investments.

Training & Collaboration

An important element of our Modern Slavery Framework is to raise awareness of modern slavery issues, both internally and through active collaboration with our suppliers, peers, corporates and governments. During the reporting period, members from the Walk Free initiative presented at Tattarang Group presentations on their work to combat modern slavery; the increased risk of slavery arising from COVID-19 and steps business can take to protect vulnerable workers.

We also designed 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.

Figure 05: Global Slavery Index



Case Study: Our approach to responsible investment

Our Responsible Investment Principles are anchored in the concept of sustainable development.

All investments require a consideration of how Tattarang contributes, through our business activities, to the broader sustainable development agenda. At Tattarang we not only consider the ESG risks and opportunities associated with each investment, but also seek to encourage and support our investees to improve their ESG risk management and develop more sustainable business practices.

The Principles guide our investment decisions and ongoing active management of our investees.

- We will consider ESG risks and opportunities in all investment decisions;
- We will integrate ESG factors into all investment policies and processes;
- We will appraise the ESG performance of all potential investees;
- We will seek continuous improvement by monitoring the effectiveness of our actions; and
- We will report and communicate on our progress towards implementing the Principles.

In order to assess overall performance of potential investees, ESG factors, in addition to financial performance, are considered at the first stage of the investment lifecycle and formally at investment decision stage. This then informs our ongoing investment strategy, including active monitoring, management and reporting of investments. Guided by the philanthropic initiatives of The Minderoo Foundation, the following factors are prioritised when assessing overall ESG performance, including the risks and opportunities, of potential investees.

- **Human rights impacts.** Through their business activities, companies have the potential to both directly and indirectly impact the rights of their stakeholders, including employees, contractors, suppliers, and indigenous and local communities. Our priorities are to protect labour rights to ultimately avoid instances of modern slavery, to protect the rights of indigenous peoples, and to protect the right to privacy.
- **Environmental impacts.** Waste and pollution generated through the production and distribution of goods and/or delivery of services has the potential to cause severe harm to our environment and the ecosystems it supports, specifically marine and terrestrial life.

In addition, we will not invest in any company involved in the production and/or distribution of tobacco products or pornographic content, as well as any company involved in the production of virgin plastics. Further to this, we actively seek opportunities to invest in companies that are aligned with our values which includes companies that support youth education, indigenous rights, community-based initiatives (primarily community-based arts), and ethical artificial intelligence and research.

Key risks and our response

Tattarang Group Operations

During the reporting period, we performed a review of the risk management processes in place within the organisation to ensure they were sufficient in managing modern slavery risks.

Across the Tattarang Group, all staff are employed in Australia in compliance with local laws and the NES.

Due to the strong labour laws and regulatory environment in Australia, this presents a relatively low risk of modern slavery in our operations. However, we identified the following operating businesses as having a higher risk of modern slavery due to the vulnerabilities of some of the workers employed by the business:

Operating business	Description of risk
<p>SFM Marine</p>	<p>SFM Marine is a lifting and marine maintenance company providing leisure craft and commercial vessel repair, maintenance and storage. SFM Marine provides a range of services and the workforce is comprised of shipwrights, engineers, fabricators, marine painters and electrical services. Due to the nature of work, seasonality can affect resourcing and some services offered by SFM Marine require lower skilled and therefore lower paid work. This means some workers are employed on a temporary basis without access to the benefits of being a permanent employee.</p> <p>While SFM Marine presents a higher risk due to the nature of its operational workforce, the business operates exclusively in Australia, which has a strong industrial relations, labour and regulatory requirements. In addition to this, our industrial instruments, operational policies and processes protect the labour rights of our employees and contractors that work for, or on behalf of, the Tattarang Group. Together these factors contribute to a relatively lower risk of modern slavery within our own operations.</p>
<p>Harvest Road Group</p>	<p>Harvest Road Group is an agricultural investment business that produces high quality, sustainable agricultural food products via two operating businesses: Harvest Road Beef, and Harvest Road Oceans. Due to the nature and skill requirements of the work, particularly at Harvest Road Beef, a proportion of the workforce is comprised of migrant workers and casual workers. Harvest Road Beef is aware of the risks posed if migrant workers are not employed on the same terms as local employees. There are exploitation risks in the off-shore recruitment process that Harvest Road Beef are also aware of.</p> <p>Harvest Road Group has taken a number of steps to mitigate these risks such as having a “zero fees” recruitment policy, use of a “whistleblower” hotline and conducting due diligence on labour hire agencies. All migrant workers employed by Harvest Road Beef are covered by the same employment arrangements as local staff. Harvest Road Group continues to review the labour and health and safety conditions of Harvey Industries Group and will implement improvements as are required and appropriate.</p>

Harvest Road Group Operations

Harvey Industries Group, which sits within the Harvest Road Group is an established business with its own dedicated human resources team, supported by established policies and processes. The Code of Conduct which applies to all its employees provides that the human rights of every individual will be respected and upheld, explicitly referencing indicators of human rights abuses including forms of modern slavery such as forced labour, child labour, human trafficking and bonded labour.

Prohibition of the following activities, as defined in the Code of Conduct, help us to address and mitigate modern slavery risk:

- Charging recruitment fees, including costs associated with travel, processing official documents and work visas in home or host countries;
- Confiscation or withholding of identity documents or other valuable items;
- Deposits or security payments by employees;
- Deception in wage commitments, payment, advances and loans;
- Forced work in excess of the hours permitted in national law or specified legally recognised collective bargaining agreements;
- Unreasonable restriction of employees' freedom of movement; and
- Bribery and corruption.

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Harvey Beef Processing Plant in Harvey, Western Australia.

The Code of Conduct makes further provision for:

- Written contracts and provisions to provide translation when required;
- Contracts prior to deployment for internationally recruited employees;
- A workplace free from any form of harsh or inhumane treatment;
- Direct, regular payment of at least the minimum wage required by applicable laws or legally recognised collective bargaining agreements and deductions, advances and loans authorised by relevant national law;
- Clear and transparent information about hours worked, rates of pay and calculation of legal deductions;
- Direction to hire migrant workers directly where possible and when subcontracting is necessary, ensuring labour agencies operate legally and are certified or licensed by the competent authority; and
- An effective grievance procedure for submission of grievances without prejudice or reprisal.

The majority of the hiring for the Harvey Industries Group is done internally through its human resources team. Labour recruitment agencies are engaged for employment of migrant workers from China and the Philippines.

To date, no instances of exploitative labour practices have been identified through our due diligence procedures (see **Case Study: Auditing our offshore labour recruitment agencies** for more detail).



Case Study: Auditing our offshore labour recruitment agencies

Harvey Industries Group engage labour recruitment agencies for employment of migrant workers from China and the Philippines, and these services were identified as having a higher inherent risk during our FY20 risk assessment. The business has relied on these agencies for recruitment in prior years and is likely to do so again in the future.

Along with the other suppliers identified as high risk, Harvey Industries Group issued SAQs to these suppliers to understand the provisions they have in place to manage modern slavery and human rights risks. A site audit was planned for FY20, however unable to be carried out due to the implications of COVID-19.

Harvey Industries Group has previously undertaken site audits and reviews to assess the practices undertaken by these companies were in line with our expectations. This has also included site visits to the abattoir for which the recruitment agency sources labour.

These activities have typically been conducted directly by our management team rather than through third party audits but have included specialist input.

The scope of the assessment included:

- Employment and onsite accommodation conditions;
- Interviews with employees on recruitment process, treatment whilst at work and their general well-being; and
- Checks on pay, contract details and document retention practices.

This is consistent with interviews conducted by our human resources team with new employees on arrival in Australia.

Supply chains

During the reporting period, the Tattarang Group had a decentralised approach to procurement, with each business operation responsible for procuring its own goods and services.

In line with the broader review of our operating model, we are reviewing our preferred approach for procurement activities.

Case Study: Following the risk

During the reporting period, the Tattarang Group issued a Modern Slavery Self-Assessment Questionnaire (SAQ) and held interviews with five of its highest risk suppliers.

The purpose of this investigation was to understand the extent to which these suppliers assess and manage modern slavery risks within their own operations and supply chain. Audits were planned for several of the suppliers however these did not occur due to the travel restrictions resulting from the COVID-19 crisis. The outcomes of the SAQs and interviews will continue to inform ongoing supplier management approaches.

In an effort to continually improve our approach and overcome the limitations stemming from COVID-19, following the reporting period we reviewed and updated our SAQ to ensure more detailed responses are captured and appropriate evidence is provided.

The updated SAQ has been issued to our 22 highest risk suppliers. The process of selection included applying a spend and frequency of engagement threshold to our high and medium-high risk suppliers, as identified through our risk assessment.

By assigning a spend threshold of \$2000 and above and a frequency of engagement threshold of two or more procurement instances, we were able to identify the suppliers over which we have the greatest leverage to enact change.

In addition, after the reporting period we performed a desktop-based analysis on 10 of the highest risk suppliers. This involved reviewing each supplier’s publicly available policies and procedures and performing an adverse media search to identify any potential instances of labour exploitation and/or human rights violations.

We are reviewing responses received and will continue to engage with the suppliers.

The Modern Slavery Self-Assessment Questionnaire (SAQ)

Support the identification of modern slavery risks



Foster collaborative efforts between suppliers and operating businesses to address these risks



Improve transparency



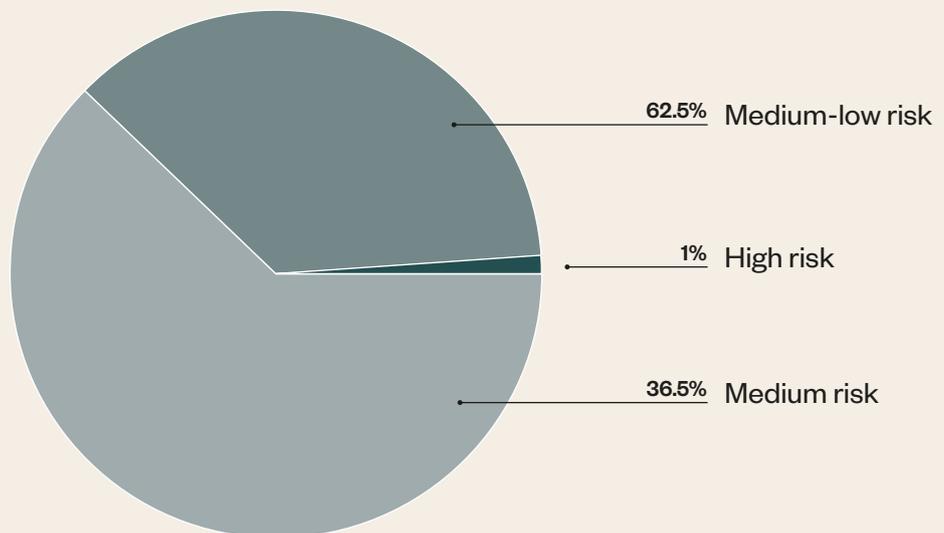
Identify areas for further due diligence

Following the reporting period we improved our modern slavery risk assessment process to identify what we consider to be a more accurate assessment of modern slavery risk based on our spend during the reporting period.

The results from this assessment are provided in the table below, and in **Figure 06**.

Entity	Risk Score					Total
	Low	Medium-low	Medium	Medium-high	High	
Tattarang	1	625	480	3	14	1123
Harvest Road Group	0	853	382	8	7	1250
Total Tattarang Group	1	1478	862	11	21	2373

Figure 06: Tattarang Group Total Risk Scores during reporting period



We recognise that the risk in Tier 1 of our supply chain is lower, with the majority of suppliers (62.28%) in the medium-low risk category, due to the high proportion of our spend with Australian headquartered suppliers.

However, we also recognise that Australian headquartered suppliers may be manufacturing or sourcing raw materials from high-risk countries given Australia imports an estimated \$12bn worth

of goods at risk of forced labour each year (see **Figure 05 on page 16**). As such, moving forwards we are committed to looking beyond our Tier 1 suppliers to understand and address modern slavery risks that exist in our indirect supply chain.

Across all entities within the Tattarang Group, the inherent risk of modern slavery are considered the highest within the following procurement categories, shown on the next page.

Procurement category	Description of risk
 <p>Cleaning, Catering & Security Services</p>	<p>All entities within the Tattarang Group use cleaning, catering and/or security services, whether that be in office, at site, or contracted for events. 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.</p>
 <p>Food processing & production</p>	<p>Harvest Road Group and its operating entities rely upon food 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. Our supplier base includes food processing companies outside of Australia, where inherent the risks of labour exploitation and modern slavery may be higher.</p>
 <p>Apparel</p>	<p>All entities within the Tattarang Group purchase apparel for various purposes, including personnel protective equipment, uniforms and/or merchandise. In terms of spend, the entities which procure the most apparel are Global Rapid Rugby and Harvey Industries Group. 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.</p>
 <p>Electronic hardware & software</p>	<p>All entities within the Tattarang Group 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 Malaysia, where a lack of regulation and weaker political institutions undermine the rights of workers.</p>
 <p>Freight, transportation & logistics</p>	<p>Freight and logistics services are required for the transport of goods produced by entities within the Tattarang Group, in particular Harvest Road Group. 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, migrant workers, women and temporary workers. Further, traversing geographic borders can exacerbate this issue by limiting visibility of employers and scrutiny by regulators.</p>
 <p>Travel & Accommodation</p>	<p>Employees within the Tattarang Group are sometimes required to travel to carry out work. Typically, the workforce at hotels and other forms of accommodation consists of workers that are low skilled and low paid, migrant workers, and/or women, which makes them more vulnerable to modern slavery.</p>

Remediation

Overview

We did not identify any instances of modern slavery during the reporting period. However we are aware that modern slavery can be present in almost every supply chain and are committed to improving our risk identification and assessment processes. If we identify a situation where Tattarang Group has caused, contributed or is directly linked to modern slavery, we are committed to providing remedy, or facilitating access to remedy for all those impacted.

Tattarang

We aim to create an environment where individuals are comfortable to speak up if they suspect wrongdoings or illegal activity. First and foremost, we encourage our employees to raise issues or concerns directly with their managers and/ or a representative from the people and culture team. During the reporting period, an external Whistleblower Hotline was also available to all those working for or on behalf of Tattarang accessible 24 hours / 7 days a week to raise grievances anonymously.

Establishing a plan for providing remedy is essential to the success of remediation. As such, during the reporting period we identified the need for practical guidance on how to remediate and prevent harm from reoccurring, while achieving the best outcomes for victims. We have since developed a Remedial Action Plan which will be adopted in FY21.

Harvest Road Group

The approach to remediation within the Harvest Industries Group is defined within the Corrective Action, Investigation and Incident Process. This process is applied both internally and externally across Harvey Industries Group and is designed to cover non-conformances including any serious breach of our modern slavery provisions, human rights violations or incidents of modern slavery. In each case where a serious non-conformance incident is identified, a report is produced and shared with the relevant General Manager. No non-conformances in relation to modern slavery were reported during the reporting period.

Harvest Road Group's remediation process is supported by numerous policies which clearly define the procedures undertaken internally to remediate harm. The Workplace, Discrimination and Harassment Policy outlines the expected behaviour and requirement of all staff to treat others with dignity, courtesy and respect. The Policy names unacceptable workplace conduct in line with legislation including the Australian Human Rights Commission Act.

In addition to providing employees access to Tattarang Group's Whistleblower Hotline, Harvey Industries Group implement an elevated set of several policies and procedures that promote a culture of compliance, honesty and ethical behaviour. The Workplace Complaints Procedure and a Workplace Investigation Procedure support the Whistleblower policy. These procedures establish relationships with employees will be conducted in a fair and impartial way, outlining the belief that unless formal complaint or problem-solving procedures are in place, work-related problems or misunderstandings may escalate and remain unresolved. This is achieved through taking all complaints seriously, undertaking a fair and thorough investigation each time, treating all complaints confidentially and consistently and ensuring no employee experiences victimisation as a result of making a complaint.

Measuring effectiveness

The focus of our activity during the reporting period was to establish a baseline understanding of our risks and identify opportunities to strengthen our policy environment. We have a strong appetite for continuous, year on year improvement, underpinned by the increasing centralisation of functions and processes across the Tattarang Group. To support these aims, a Modern Slavery Steering Group was established to identify short, medium and long-term priorities for improvement.

The Modern Slavery Steering Group will also be responsible for tracking our improvements and will report to the senior leadership on the following key performance indicators:

- Suppliers assessed through our Risk Assessment Framework and % of high/medium/low risk;
- SAQs issued and completion rate;
- Follow-up meetings held with suppliers;
- Site visits/audits;
- Corrective actions issued;
- Incidents raised (cases of modern slavery or indicators of related exploitation); and
- Remedy provided by Tattarang or Harvest Road Group and/or suppliers.

As our controls mature and become more embedded across our businesses, we expect that our Steering Group will play a key role in measuring the effectiveness of these measures. We will work with external specialists as needs are identified, to ensure we are constantly evolving and strengthening our approach.

We have a clear plan forward for FY21 and beyond, derived from our current state to propel us toward our desired level of modern slavery risk management maturity.



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Photo credit: Ahsanization.

Tattarang's key areas for improvement and relevant timeframes are set out below.

Area Of Focus	Improvement Initiative	Actions FY21	Actions FY22
Governance 	<p>Strengthen policies and review contract templates to accord with our modern slavery risk framework.</p>	<p>Adopt and implement updated Supplier Code of Conduct and procurement policy.</p> <p>Roll out purchase order standard terms and conditions that include clauses on modern slavery.</p> <p>Update and standardise contract templates used by our businesses.</p> <p>Implement Responsible Investment Principles with specific metrics on modern slavery.</p> <p>Establish centralised intranet portal to house all relevant policies.</p>	<p>Identify areas for further improvement in our policies and contracts.</p>
	<p>Steering Group to increase engagement with each of the operating businesses to understand their future activities and associated risks.</p>	<p>Modern Slavery Steering Group to facilitate meetings with high risk operating businesses and establish a feedback mechanism where businesses regularly feed into the Steering Group.</p>	<p>Continuous engagement with operating businesses to better understand their future activities and associated risks.</p>
Risk Assessment 	<p>Conduct deeper due diligence on medium high-risk suppliers.</p>	<p>Review SAQs and verify responses for all medium high-risk / high-spend suppliers.</p> <p>Circumstances permitting, carry out on-site audits on three high risk/high-spend suppliers.</p>	<p>Identify priority actions for our high risk/high spend suppliers to implement and continue to develop relationships.</p> <p>Expand due diligence to Tier 2 of supply chain.</p>
	<p>Improve supplier onboarding, risk screening and verification process.</p>	<p>Select third party software to analyse risk throughout our supply chain and assist with verification of information provided by suppliers.</p> <p>Roll out new purchase order system across high risk Tattarang businesses.</p> <p>In-person training for supplier on-boarding for specialist staff (procurement, legal, people and culture, central operations).</p>	<p>Identify ways to improve our risk screening and supplier assessment processes.</p> <p>Develop standardised desktop research protocol to incorporate additional data including benchmarking data, membership of industry bodies, and relevant standards.</p> <p>Roll out new purchase order system across the remaining Tattarang businesses.</p>

Area Of Focus	Improvement Initiative	Actions FY21	Actions FY22
<p>Supplier Engagement, Corrective Action & Remedy</p> 	<p>Improve identification of incidents.</p> <hr/> <p>Improve identification of corrective action and remedy.</p> <hr/> <p>Review purchasing practices and business KPIs to assess “red flags” and impact on modern slavery risk (including turnaround time, pricing and sourcing of raw materials).</p> <hr/> <p>Ensure a victim centred approach when responding to instances of exploitation or modern slavery.</p>	<p>Increase our visibility of incidents by ensuring key medium and high-risk suppliers have an effective grievance mechanism and encourage them to report all incidents to us.</p> <hr/> <p>Conduct site visits and/or audits on three high risk/high-spend suppliers.</p> <p>Explore alternatives to in-person audits to navigate COVID-19 restrictions and utilise technologies that better reflect worker voice and empowerment.</p> <hr/> <p>Identify types of purchases where “rush orders” are common (quick turnaround time or limited due diligence conducted), including, for example, purchase of merchandise or in response to emergencies.</p> <p>Where possible, build a list of preferred suppliers in these areas to reduce risk, including, for example, preferred hotels or merchandise suppliers.</p> <hr/> <p>Assess both our and our suppliers’ response to any identified incidents of exploitation.</p>	<p>Ensure suppliers require their suppliers to have an effective grievance mechanism.</p> <hr/> <p>Conduct audits on a selection of our Tier 2 suppliers.</p> <p>Based on recommendations, adopt hybrid model to audits, including role of worker voice.</p> <p>Online workshops focused on remediation held with all high-risk/ high-spend Tier 1 suppliers.</p> <hr/> <p>Continue process of identifying “red flag” purchasing practices and preferred suppliers.</p> <hr/> <p>Survivors review our remedial action plan and feedback incorporated.</p> <p>Continue to improve our remedial action plan, based on actual responses to exploitation by us and/or our suppliers.</p>
<p>Training & Collaboration</p> 	<p>Roll-out compulsory training on modern slavery for all staff.</p>	<p>Modern Slavery training module completed by all staff, and included in onboarding process for new starters.</p>	<p>Continue to improve training based on staff feedback / test results.</p> <p>Develop annual training refresher courses tailored to specific staff (e.g. people and culture, procurement, senior management).</p>

Harvest Road Group's key areas for improvement and relevant timeframes:

Area Of Focus	Improvement Initiative	Actions FY21	Actions FY22
Governance 	Strengthen policies and review contract templates relating to modern slavery.	<p>Ensure the Harvey Industries Group Code of Conduct is adopted by and implemented across all Harvest Road Group entities.</p> <p>Ensure all suppliers are provided with and acknowledge our Supplier Code of Conduct as part of their onboarding.</p> <p>Ensure all employees and contractors provided with the Code of Conduct before commencing any work.</p>	Identify areas for further improvement in our policies and contracts.
	Steering Group to increase engagement with each of the operating businesses to understand their future activities and associated risks.	Modern Slavery Steering Group to facilitate meetings with high risk operating businesses and establish a feedback mechanism where businesses regularly feed into the Steering Group.	Continuous engagement with operating businesses to better understand their future activities and associated risks.
Risk Assessment 	Conduct deeper due diligence on medium high-risk suppliers.	<p>Review SAQs and verify responses for all medium high-risk / high-spend suppliers.</p> <p>Circumstances permitting, carry out on-site audits on two high risk/high-spend suppliers.</p>	<p>Identify priority actions for our high risk/high spend suppliers to implement and continue to develop relationships.</p> <p>Expand due diligence to Tier 2 of supply chain.</p>
	Conduct deeper due diligence on high-risk suppliers.	<p>Review SAQs and verify responses for all high-risk / high-spend suppliers.</p> <p>Continue third-party audits for Offshore Labour Hire agencies.</p> <p>Document interviews with Offshore Labour Hire candidates e.g. manually or through the payroll system.</p>	Identify priority actions for high risk/high spend suppliers to implement and continue to develop relationships.
	Improve supplier onboarding, risk screening and verification process.	<p>Select third party software to analyse risk throughout our supply chain and assist with verification of information provided by suppliers.</p> <p>In-person training for supplier on-boarding for specialist staff (procurement, legal, people and culture, central operations).</p>	<p>Identify ways to improve our risk screening and supplier assessment processes.</p> <p>Roll out new purchase order system.</p>

Area Of Focus	Improvement Initiative	Actions FY21	Actions FY22
Supplier Engagement, Corrective Action & Remedy 	Improve identification of corrective action and remedy.	<p>Conduct site visits and/or audits on 2 of high risk/high-spend suppliers.</p> <p>Explore alternatives to in-person audits to navigate COVID-19 restrictions and utilise technologies that better reflect worker voice and empowerment.</p>	<p>Conduct audits on a selection of our Tier 2 suppliers.</p> <p>Based on recommendations, adopt hybrid model to audits, including role of worker voice.</p>
Training & Collaboration 	Roll-out compulsory training on modern slavery for key staff.	Modern Slavery training module completed by key staff, and included in onboarding process for starters in supply chain roles.	<p>Continue to improve training based on staff feedback / test results.</p> <p>Develop annual training refresher courses tailored to specific staff (e.g. people and culture, procurement, senior management).</p>

Endnotes

- 1 Walk Free and International Organization for Migration, 'Migrants and Their Vulnerability to Human Trafficking, Modern Slavery and Forced Labour', (2019).
- 2 Our Responsible Investment Principles were developed subsequent to the reporting period.
- 3 Our Modern Slavery Policy was drafted during the reporting period and was adopted subsequent to the period.
- 4 Our Code of Conduct was drafted during the reporting period and was adopted subsequent to the period.
- 5 Our Supplier Code of Conduct was drafted during the reporting period and was adopted subsequent to the period.
- 6 Our Remedial Action Plan was developed subsequent to the reporting period.
- 7 Our Procurement Policy was drafted during the reporting period and was adopted subsequent to the period.
- 8 Our Ethical Sourcing and Modern Slavery Policy was drafted during the reporting period and adopted subsequent to the period.

