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Warmoll Enterprise

Modern Slavery Statement

For the period July 2021 – June 2022

This Modern Slavery Statement describes the steps taken by the Warmoll Enterprise and our associated entities during the Australian financial year ending June 2022 to address modern slavery risks in our business and supply chains.

1. The Warmoll Enterprise includes multiple entities:

- Warmoll Group Pty Ltd – ACN 638 094 185
- Warmoll Farming Pty Ltd – ACN 638 116 917
- Warmoll Cattle Co Pty Ltd – ACN 638 116 917
- JF Warmoll & Co – ABN 74 581 299 212
- Warmoll Foods Pty Ltd (trading as Jack's Creek) – ACN 152 503 092
- Jack's Creek International Pty Ltd – ACN 634 301 830
- Jack's Creek Americas Inc – TFIN 84-2286075
- Warmoll & Warmoll Pty Ltd – ACN 601 433 809
- Australian Certified Wagyu Beef Pty Ltd ("ACWB") – ACN 091 403 039
- Breeza Seeds Pty Ltd – ACN 127 306 003
- Warmoll Pty Ltd – ACN 001 401 109

For the purposes of this document, "Warmoll Enterprise" will encompass the broader group of entities listed in Section 1, unless otherwise indicated.

2. Our structure, operations and supply chains

The Warmoll Enterprise is wholly owned by members of the Warmoll family.

1. Warmoll Group Pty Ltd owns Warmoll Farming Pty Ltd and Warmoll Cattle Co Pty Ltd.
2. JF Warmoll & Co leases land, which is subleased to Warmoll Farming Pty Ltd.
3. Warmoll Farming Pty Ltd operates land and water assets to undertake broadacre farming, livestock breeding and backgrounding, and logistics for the farming operations.
4. Warmoll Cattle Co Pty Ltd owns cattle that are lot-fed under toll arrangements with various feedlots in NSW and Queensland.
5. Warmoll Foods Pty Ltd purchases cattle over-the-hooks from Warmoll Cattle Co Pty Ltd and other vendors. The cattle are toll processed at Australian Country Choice in Brisbane, Queensland, or Northern Co-operative Meat Company in Casino, NSW. Boxed beef is sold to domestic and international customers.

6. Jack's Creek International Pty Ltd is a holding company and owner of Jack's Creek Americas.
7. Jack's Creek Americas Inc. is a US-registered C-Corp, which purchases boxed beef directly from Warmoll Foods Pty Ltd for import and distribution in North America.
8. Warmoll & Warmoll Pty Ltd conducts a small amount of third-party meat trading as required by some customers.
9. ACWB is a toll lot feeding company
10. Breeza Seeds Pty Ltd is a seed cleaning and sales company
11. Warmoll Pty Ltd owns land

Warmoll Enterprise entities are for the most part based in and around Tamworth, NSW, but include offices in other locations including Melbourne, Victoria; Casino, NSW; Gold Coast, Queensland; and Los Angeles, California.

The companies together are an integrated soft commodity, cattle and beef business. Operations of these companies include:

- Mixed farming
- Grain trading
- Beef cattle breeding
- Beef cattle backgrounding
- Beef cattle lot feeding
- Beef cattle trading
- Beef processing, marketing and distribution

Warmoll Farming Pty Ltd employs a small number of people using direct arrangements – no intermediary. This includes 17 direct employees plus members of the Warmoll family. On occasion, including during the 2021-22 financial year, Warmoll Farming Pty Ltd has employed foreign workers. Based on our understanding of the definition of modern slavery, we are confident that we have had no instances that would be deemed to be modern slavery, or anything resembling such. We will develop a formal assessment of our processes in place for employment of this nature to ensure that these employees are not at risk of being subject to any form of modern slavery.

Warmoll Foods Pty Ltd is the main employer of staff within the Warmoll Enterprise. All staff are employed directly by Warmoll Foods – no intermediary. Warmoll Foods Pty Ltd employs 37 people, and Jack's Creek Americas Inc employs 4 people.

We have identified a total of 810 individual creditors across our various businesses from July 2019 to June 2022, who participate (or have participated) in our supply chain to a lesser or greater degree. These creditors range from local businesses (e.g. plumbers, printers, livestock agents), to cattle vendors, to feedlots and abattoirs, to customers that may have had credit notes applied, to electricity companies, to industry bodies and Commonwealth Government departments.

3. Modern slavery risks within our operations and supply chains

The Warmoll Enterprise is confident that within the companies under its direct control, as listed in Section 1, there are no instances in which any person is subject to modern slavery.

Our relatively small number of staff, and the close working relationship between the owners/directors of our companies and our employees, gives our key decision-makers direct line of sight as to our compliance with internal policies, including: Modern Slavery; Anti-Discrimination and Equal Opportunity; Discrimination and Harassment; Employee Privacy; Grievance Resolution; Work Health and Safety; and Workplace Bullying.

Based on our understanding of the industries that are among those most at-risk of modern slavery in Australia, our supply chain directly relating to livestock procurement, feeding and processing is the area that is likely to require the greatest care or scrutiny in ensuring we are able to meet our objectives in contributing

to the eradication of modern slavery. This in no way implies we suspect that this is the case with any of our suppliers, but simply relates to the common use of seasonal or temporary labour in agriculture, and foreign, temporary or unskilled labour in meat processing.

4. Actions to assess and address modern slavery risks

Our Modern Slavery Policy affirms our commitment to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery within our operations and supply chains.

Warmoll Enterprise's Human Resources Manager is in the process of developing a training module for all staff to undertake. This is still in progress, following the departure of the previous HR Manager and the commencement of the new HR Manager, with focus on ensuring broader company policies are updated and payroll and financial systems are updated to simplify processes for all Warmoll Enterprise employees. This module will explain what modern slavery is, how to identify and mitigate risks of modern slavery occurring within our businesses, processes for reporting or acting on potential instances of modern slavery and to improve our staff's understanding of the damage that could be caused to individuals and businesses affected by modern slavery.

Our Whistleblower Policy is separate to, but supports, our Modern Slavery Policy. This identifies the paths a staff member can follow in the event they feel reporting is necessary as a result of a certain event or events.

We have drafted a Supplier Code of Conduct that will be distributed to all suppliers, with an expectation of a response by a date to be confirmed, and an acceptance date also to be confirmed. Any supplier that does not accept this code of conduct will cease to become a supplier after the acceptance date, and no new supplier will be taken on without accepting the Code of Conduct. This Code has been reviewed by an external party to provide legal advice, and will be formalised and distributed to suppliers in the 2022-23 financial year.

Our formal identification of all creditors/suppliers will allow us to group all of these entities by sector and grade by level of risk.

Warmoll Foods has joined Sedex Consulting, a global member-based organisation that collates data regarding modern slavery risks and will assist us in more accurately determining where our risks lie. Our Business Manager has been tasked with ensuring that our company information is completed within Sedex, including our Self Assessment Questionnaire, during the 2022-23 financial year, and with conducting an initial risk assessment for our suppliers within the Sedex database.

5. Assessing the effectiveness of actions taken so far

As noted above, we are confident that all entities within our direct control are compliant with regard to modern slavery requirements.

Similarly, those major suppliers we work with on a regular basis, and accounting for the majority of our expenditure, are reputable companies with oversight from various government agencies and independent audit bodies, including the Commonwealth Department of Agriculture, Fisheries and Forestry AUS-MEAT. Some of these entities are also Sedex members, which will give us an initial level of visibility into their current positions.

Based on the above, our position to date has been in moving towards initial levels of visibility, rather than applying pressure to different suppliers to make changes. We believe there is greater awareness of what modern slavery is among our suppliers, and that further engagement – particularly as relates to the Supplier Code of Conduct – will enhance this further.

6. Consultation with entities the reporting entity owns or controls

The entities described in Section 1 of this document have common owners and directors, with policies applicable to one entity applicable across the Warmoll Enterprise.

7. Other relevant information

Next steps to minimise the risk of modern slavery in our supply chains.

- Finalisation of Supplier Code of Conduct
 - Includes setting a date for response from suppliers
 - Includes setting a date for acceptance by suppliers
- Roll-out of Modern Slavery training module for all staff within the Warmoll Enterprise
- Self Assessment for inclusion in the Sedex Member database
- Undertaking an assessment of our suppliers, initially utilising the Sedex risk matrix module, and then with direct engagement with most “at-risk” suppliers and those with more complex supply chains of their own, in order to better understand the broader risks of modern slavery that may exist deeper in our supply chain.

This Modern Slavery Statement has been endorsed and approved out of session by the Board of Directors of Warmoll Group Pty Ltd on 5 December 2022.



Patrick Warmoll
Managing Director
Warmoll Foods Pty Ltd

5 December 2022