



Modern Slavery Statement

1 July 2020 – 30 June 2021

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2020 - 2021 Modern Slavery Statement

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Introduction

This Modern Slavery Statement is made under the *Modern Slavery Act 2018* (Cth) (the "Act"), with the ultimate objective to address modern slavery risks outlined in the Statement submitted by B & E Foods Pty Ltd in 2019 – 2020.

This is a joint statement that has been prepared by, and made on behalf of, B & E Foods Pty Ltd (ACN: 629 618 837) and its associate entities listed in Appendix 1 (**B & E Group**) and covers the period of 1 July 2020 to 30 June 2021.

B & E Group is dedicated to respecting fundamental human rights for everyone, with a specific focus on identifying and addressing modern slavery risks throughout all aspects of its operations.

B & E Group Business

B & E Group has a business model consists of entities conducting businesses in multiple industries across Australia.

- **Wholesale:** B & E Foods has been a family-owned business in Australia more than 30 years, operating as a food services business, owning and operating processing plants, warehouse, distribution centre and producing chicken and meat products. B & E Foods directly employs more than 400 employees for their operation. Their operation consists of:
 - Procurement - deals with local farms, meat suppliers and local food product processing manufacturers
 - Poultry & Meat Processing - Primary and further processing of meat and meat related products for sale to major wholesale customers.
 - Distribution - warehousing and distribution of poultry and wholesale products to customers
- **Retail:** Wesfresh is a grocery retail business in Australia supplies food and groceries items to the public. It has created career opportunities to the local residents with more than 20 employees for their operation:
 - Procurement: Deal with local suppliers for grocery items. Asian groceries are sourced from wholesalers with Tier 2 overseas suppliers / manufacturers from Asia-Pacific regions to process and produce grocery and food related products for sale to public.
- **Packaging:** E & J Global is a packaging wholesale business in Australia supplies packaging materials for food related industry. E & J Global sources packaging materials mainly from China and it has more than 10 employees for their operations.

B & E Group's Supply Chain

B & E Group's supply chain has remained largely consistent in FY20, with most of our essential suppliers unchanged. The majority of the Group's direct suppliers are based in Australia, and we continue to prioritise partnering with local businesses to support the economy and mitigate the modern slavery risk, as local suppliers present less opportunities to exploit vulnerable workers for profit.

B & E Group has the packaging material sourcing in China. Their suppliers are Sedex members and self-accessed to present low vulnerable risk in modern slavery.

Risks of Modern Slavery Practices in Our Operations and Supply Chains

The B&E group engages with a broad network of suppliers providing goods and services and remains steadfast in its commitment to compliance across all areas, including addressing modern slavery risks. Our supply chain is diverse, encompassing suppliers ranging from family-owned farms to multinational corporations. While the majority of our food products are sourced from within Australia, we also procure goods from international markets, which inherently increases the potential risk of sourcing from regions where modern slavery practices may occur.

In recognition of these risks, B&E Group takes all reasonable steps to ensure ethical and responsible sourcing practices are upheld throughout our supply chain. The nature of our business exposes us to specific modern slavery risks, including the exploitation of labour in the harvesting and manufacturing of products overseas, as well as the possibility of setting unrealistic cost targets and delivery timeframes that could pressure suppliers into exploitative practices. These risks remain consistent with our previous assessments, and we continue to prioritize identifying, addressing, and mitigating modern slavery risks within our operations and supply chains.

Actions to Assess and Address Modern Slavery Risks

The B&E Group has consistently implemented a range of actions to assess and address modern slavery risks within our operations and supply chains. These efforts include both ongoing initiatives and completed measures, ensuring potential risks are effectively managed. Key actions taken include:

- **Commitment to Ethical Practices:** We uphold practices that prevent modern slavery and human trafficking in our supply chains and any part of our business operations.
- **Ethical Business Relationships:** We act ethically and with integrity in all our business relationships to promote a culture of transparency and accountability.
- **Contractual Modern Slavery Provisions:** Our supply contracts for the 20/21 financial year include comprehensive modern slavery provisions, reflecting our commitment to ethical sourcing and supplier accountability.
- **Supplier Collaboration and Due Diligence:** We support our suppliers in resolving or mitigating risks within their operations. We conduct thorough due diligence processes on prospective and existing suppliers, including assessments of their supply chains, employment practices, and compliance with modern slavery laws.
- **Regular Supplier Assessments:** We conduct regular modern slavery questionnaires for Tier 1 suppliers to evaluate potential risks and ensure compliance. This process ensures continuous monitoring of high-risk areas within our supply chain.
- **Self-Assessment Programs:** We have implemented a self-assessment program to evaluate modern slavery risks within our own operations, complementing our broader due diligence processes and enabling proactive risk identification and mitigation.
- **Performance Measurement:** We measure performance through various indicators, including supplier compliance rates, the number of completed assessments, and identified areas of improvement. We are continuously developing additional measurable indicators to enhance our monitoring capabilities and ensure meaningful progress.
- **Training Initiatives:** To strengthen awareness and accountability, we provide modern slavery training to key personnel, ensuring they understand the risks and their responsibilities in identifying and addressing potential issues.

In addition, the B&E Group is committed to engaging with industry bodies, working groups, and external experts to enhance our modern slavery response. We also plan to extend our due diligence processes to Tier 2 and Tier 3 suppliers, further strengthening visibility and accountability across the entire supply chain.

Grievances

B & E Group continues to take steps to increase employee awareness and engagement regarding modern slavery by providing training sessions and self-assessment questionnaires to employees.

B & E Group maintains several following policies to protect employees and other disclosers so they can raise concerns with management of the Group in a supportive environment:

- Employment Policy
- Modern Slavery Policy
- Whistleblower Policy
- Anti-bribery Policy
- Ethical Sourcing Policy
- and policies relating to anti-victimisation, anti-harassment, anti-discrimination, anti-bullying, as well as WHS guidance.

Remediation

The B & E Group has not identified any actions within that may have caused or contributed to modern slavery, however, is committed to undertaking a regular assessment by requesting employees to complete self-assessment questionnaires regarding this matter.

Effectiveness of Actions to Address Modern Slavery Risks

The B&E Group has implemented a structured approach to evaluate the effectiveness of actions taken to address modern slavery risks within its operations and supply chains. This framework focuses on measurable outcomes, stakeholder engagement, and continuous improvement. The implemented measures include:

- Measurable Indicators
 - Tracking supplier compliance rates suppliers modern slavery risk assessment and suggested SMETA audits.
 - Monitoring risk reduction metrics, such as the number of identified risks mitigated or resolved.
 - Recording training completion rates for employees and suppliers on modern slavery awareness.
 - Analysing incident reporting data, including the number of cases reported and resolved through whistleblower or grievance mechanisms.
- Supplier Monitoring and Audits
 - Conducting regular supplier unannounced visits, to evaluate adherence to modern slavery policies.
 - Monitoring and reviewing corrective action plans implemented by non-compliant suppliers.
 - Analysing results from supplier self-assessments and questionnaires to identify recurring risks or gaps.
- Stakeholder Engagement
 - Collecting feedback from suppliers, employees, and external stakeholders on the effectiveness of policies and initiatives.
 - Collaborating with industry working groups to benchmark practices and strengthen strategies to combat modern slavery.
- Transparency and Reporting
 - Reviewing and reporting key performance metrics in annual Modern Slavery Statements.

- Including case studies or specific examples of risk mitigation efforts and their outcomes to ensure transparency and accountability.
- **Grievance Mechanisms**
 - Reviewing data from whistleblower or grievance mechanisms to identify patterns or areas of concern.
 - Measuring the timeliness and effectiveness of responses to reported issues.
- **Internal and External Reviews**
 - Conducting internal reviews to ensure processes and policies align with best practices and legal requirements.
 - Engaging independent consultants to evaluate the effectiveness of modern slavery initiatives.
- **Continuous Improvement**
 - Comparing performance over time to identify trends and areas for improvement.
 - Revising strategies and policies based on assessment outcomes, feedback, and developments in best practices or legal requirements.
 - Expanding due diligence processes to lower tiers of the supply chain to enhance visibility and accountability.
- **Training Program Evaluations**
 - Evaluating the impact of training programs by assessing participant understanding and ability to identify risks.
 - Collecting feedback from employees and suppliers to refine training materials and delivery methods.

Through the implementation of these measures, the B&E Group aims to establish a robust, adaptive framework for addressing modern slavery risks and promoting ethical practices across its operations and supply chains.

Engaging and Consulting with Entities to Prepare This Statement

The Statement has been developed and reviewed by the B&E Group senior management with functional responsibility for the day-to-day management of B & E Group.

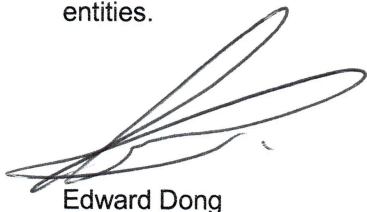
We have engaged in consultation with each member of Our Group through daily conversations and regular meetings to ensure that they are aware of the actions that they need to take and the modern slavery risks in the operations so that they can be identified, assessed and addressed.

Conclusion

B & E Group is dedicated to continuously examining its supply chain to identify any modern slavery risks and taking the necessary actions to mitigate them. This statement reflects that ongoing commitment.

Declaration

The Statement was approved by the Board of B & E Group and signed by the CEO on behalf of all reporting entities.



Edward Dong

CEO

B & E Group

Appendix 1

B & E Group operates their business across multiple locations in Australia as follows:

	Reporting Entities	ACN	Location
1	B & E Foods Pty Ltd	629 618 837	Australia
2	E & J Global Pty Ltd	641 985 855	Australia
3	Wesfresh Sydney Pty Ltd	642 083 770	Australia
4	Melco Foods Pty Ltd	631 526 586	Australia
5	B & E Services NSW Pty Ltd	642 086 262	Australia
6	B & E Poultry (Queensland) Pty Ltd	154 695 539	Australia
7	B & E Services QLD Pty Ltd	642 087 027	Australia
8	B&E Food Melbourne Pty Ltd	619 726 555	Australia
9	Wesfresh Melbourne Pty Ltd	642 085 318	Australia
10	B & E Services VIC Pty Ltd	642 091 129	Australia
11	B & E Foods Adelaide Pty Ltd	646 541 960	Australia