



Modern Slavery Statement FY2023

Hellers Group Holdings Limited

Mandatory criteria	Section & page number
1. Identify the reporting entity.	Introduction
2. Describe the reporting entity's structure, operations and supply chains.	About Hellers
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Understanding our risks
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Hellers' actions and to assess and address modern slavery
5. Describe how the reporting entity assesses the effectiveness of these actions.	Effectiveness of our actions
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Consultation
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Throughout Statement

This is Hellers Group Holdings Limited's (Hellers Group) Modern Slavery Statement for the financial period ending 30 June 2023. It is our second Modern Slavery Statement.

This Statement was prepared in accordance with the *Modern Slavery Act 2018* (Cth), Australia (the Act). As Hellers Group takes a whole of organisation approach, this report identifies the steps taken by Hellers Group (Hellers Group Holdings Limited, New Zealand, and its controlled entities, including those carrying out business in Australia) to assess and address modern slavery risks in our operations and supply chain. Our structure is explained in the "About Hellers" section.

Reporting entity

This Statement is a Joint Statement pursuant to section 14(1) of the Act, made by Hellers Group Holdings Limited on behalf of HLRS HoldCo Pty Ltd, HLRS BidCo Pty Ltd and Hellers Australia Pty Limited (collectively referred to as Hellers Australia). The reporting entities covered by this statement are:

- HLRS HoldCo Pty Ltd (holding company, ABN 32 628 433 134)
- HLRS BidCo Pty Ltd (holding company, ABN 37 628 177 266)
- Hellers Australia Pty Limited (trading company, ABN 17 627 366 750)

This Statement also covers risks and actions in relation to the New Zealand trading entity, Hellers Limited (Hellers NZ), which is not a reporting entity for the purposes of the Act. References to "our" and "we" in this Statement are references to Hellers Group, including the reporting entities (above) and Hellers NZ. The approach and associated policies and procedures for managing modern slavery are consistent across Hellers Group.



Chief Financial Officer's Message

Hellers is committed to respecting internationally recognised human rights, including the right to be free from forced labour and other forms of modern slavery.

As a supplier to the retail and food service sectors across Australia and New Zealand, we pride ourselves on our ability to provide high quality, tasty and convenient products. It is important to us to operate ethically and to treat people well. This includes actively preventing and addressing the risk of labour exploitation – including modern slavery – in the work we do, and in our broader supply chain. To guide our approach, we refer to the Australian *Modern Slavery Act 2018* (Cth) (the Act) and associated guidance, as well as the International Bill of Human Rights, the International Labour Organisation's (ILO) core conventions, and the UN Guiding Principles on Business and Human Rights (UNGPs).

Hellers are committed to addressing our modern slavery impacts and risks in our operations and supply chain. This year, we have made improvements on our supplier due diligence processes, including updating our supplier self-assessment questionnaires (SAQ) to better understand suppliers' current practices and identify areas of concern – including potential red flags for forced labour. This will help inform how we contract and engage with suppliers to improve our labour and sourcing practices and manage risks.

We have also undertaken an update to our modern slavery risk assessment to help prioritise supplier categories for stakeholder engagement. This is an evidence-based assessment to identify potential risk to people in our operations and supply chain. We will use the findings of this risk scan to engage higher risk suppliers to identify and address their modern slavery risks and establish appropriate controls.

We will continue to focus on progressing our programs to address modern slavery risk in our operations and supply chain and achieving the goals set out in our Modern Slavery Action Plan.

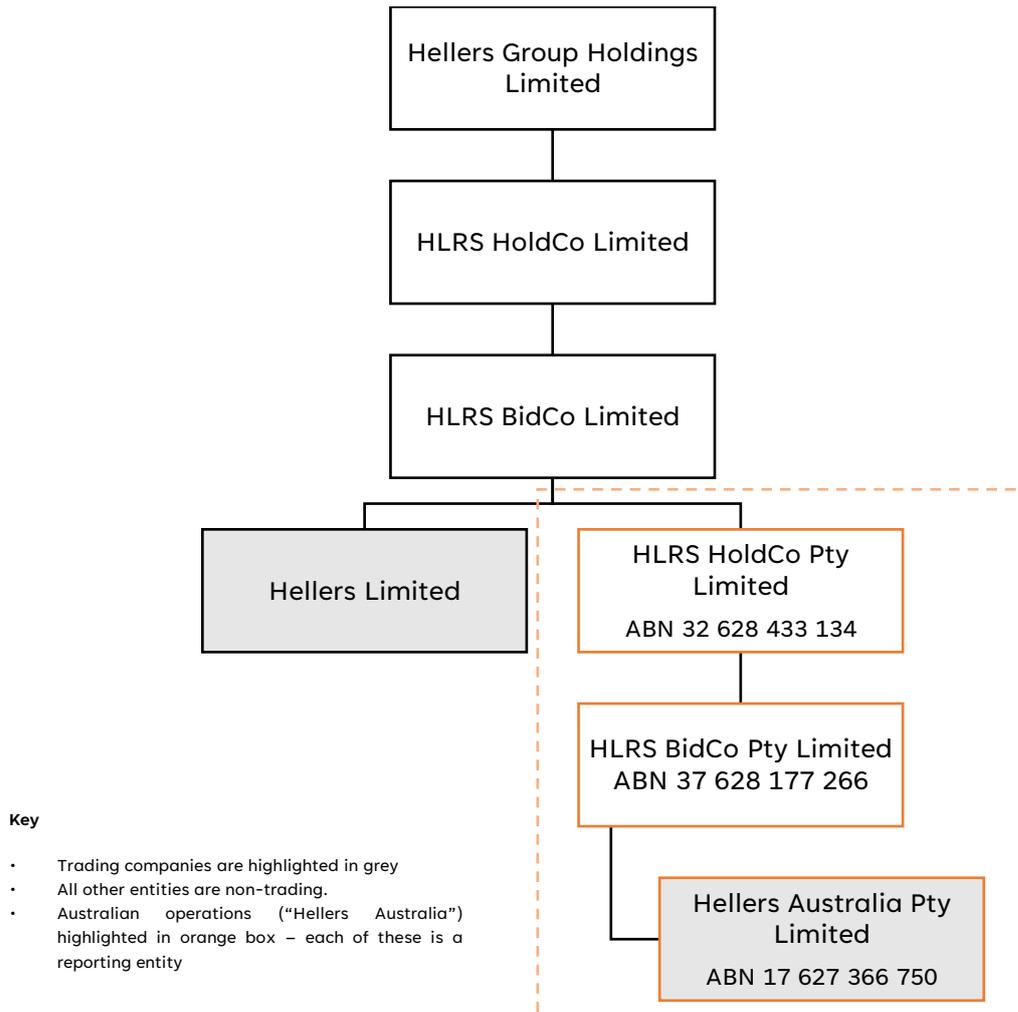
Kim Dorling, CFO



About Hellers

Hellers Limited (Hellers NZ) and Hellers Australia Pty Limited (Hellers Australia) are the trading entities of the Hellers Group Holdings Limited (Hellers Group). Hellers Limited operates in New Zealand, and Hellers Australia operates in Australia. Hellers Group is headquartered in Christchurch, New Zealand. Our structure remains the same as during the last reporting period and there have been no substantive changes from our last Statement.

Structure of Hellers Group



Hellers NZ is New Zealand’s leading smallgoods manufacturer producing a range of bacon, ham and smallgoods products sold to retail, foodservice, industrial, Quick Service Restaurant, and export customers. Hellers NZ has two manufacturing sites – Kaiapoi, Christchurch and Wiri, Auckland. Hellers NZ purchases meat and ingredients from local and international suppliers. In FY2023, Hellers NZ purchased NZD \$126m of meat and ingredients from 93 suppliers.

Hellers Australia produces a range of further processed and ready to eat products from chicken and other meat products, sold to retail, foodservice and industrial customers. Hellers Australia has two manufacturing sites – Bendigo, Victoria and Jandakot, Perth. In FY2023,



Hellers Australia purchased AUD \$83m of meat and ingredients from 85 local suppliers who may import components of the ingredients.

In FY2023, Hellers Group employed over 850 people across New Zealand and Australia, including direct hire permanent and casuals, and indirect hire temporary agency staff.

Hellers Group site map



We outline key features of our operations and supply chain below.

A1. Own Operations

<p>Direct employment of workers</p>	<ul style="list-style-type: none"> Hellers Group employs over 550 people in New Zealand and 300 in Australia, including direct hire permanent and casuals, and indirect hire temporary agency staff. Indirect staff includes zero in New Zealand, 50-60 in Jandakot, and 30-40 in Bendigo. The number of indirect staff employed at Hellers fluctuates seasonally.
<p>The provision and delivery of products or services</p>	<ul style="list-style-type: none"> Hellers NZ manufactures and distributes bacon, ham and smallgoods in NZ. Hellers Australia manufactures and distributes ready to heat and ready to eat poultry and other meat products. Hellers Group currently has four manufacturing sites across Christchurch and Auckland, New Zealand; Jandakot, Western Australia; and Bendigo, Victoria, Australia. There are office-based staff working from Kaiapoi (Christchurch), Wiri (Auckland), Parnell (Auckland), and from the Victoria and Western Australia sites.
<p>Financial Investments</p>	<ul style="list-style-type: none"> Hellers Group is structured as listed above and holds no external investments outside of the Hellers network. Hellers Group's largest investor is Adamantem Capital.



A2. Supply Chain

Products provided to the entity by suppliers	<ul style="list-style-type: none"> Products purchased by Hellers Group includes but is not limited to: meat products (e.g., pork, poultry, beef, fish) non-meat ingredients (e.g., tapioca, sugar, oil,), packaging (e.g., labels, cartons, trays, film), and capital machinery (e.g. manufacturing equipment, forming and frying line equipment). Hellers Group’s most significant supplier spend is within Australia and New Zealand, with the purchase some imported goods from Asia, Europe, and North America.
Services provided by suppliers	<ul style="list-style-type: none"> Services provided by freight, contract labour, professional services, cleaning services, software, waste disposal, insurance, marketing, maintenance (pest control), labour services (including temporary workers for factory and warehouse) and utilities.
Products and services used by indirect suppliers in Hellers Group’s supply chain	<ul style="list-style-type: none"> An example of products and services used by suppliers includes grain purchased for poultry.

Understanding our risks

Modern slavery

Modern slavery describes situations of exploitative labour practices that undermine personal freedoms, often involving threats and coercion, and a lack of freedom and choice. Practices that constitute modern slavery include trafficking, debt bondage, forced labour, forced marriage, and the worst forms of child labour.¹

According to the latest estimates from the International Labour Organisation (ILO), more than 50 million people globally live in modern slavery – of which, forced labour accounts for 27.6 million. The ILO estimates the rise in prevalence of forced labour has grown from 3.4 to 3.5 per thousand people in the world.²

We are guided by the definition of risk as per the Act, which considers modern slavery risk in terms of “risk to people” of experiencing harm rather than “risk to business”. We recognise that we may cause, contribute or be linked to modern slavery risks as a result of our business activities and relationships, as set out in the UN Guiding Principles on Business and Human Rights (UNGPs) ‘continuum of involvement’.³

In the following reporting period, we will consider how this continuum relates to our specific risks and determine our potential level of responsibility or proximity to the risks.

¹ This definition of modern slavery is derived from the Australian Modern Slavery Act (2018).

² Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, ILO 2022
www.ilo.org/global/topics/forced-labour/publications/WCMS_854733/lang--en/index.htm

³ ‘Guiding Principles on Business and Human Rights’, UN Human Rights Office of the High Commissioner 2011,
www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf



We are aware that Hellers Group operates in an industry (agriculture, and specifically the meat industry) that is considered by reputable sources to be relatively high risk for modern slavery.⁴ These industries, including in Australia, include workers who may be more vulnerable to experiencing conditions of unfair recruitment practices and labour practices or modern slavery. Agriculture and meat industry workers are documented as vulnerable to, among others, trafficking, debt bondage and deceptive recruitment. They may experience gruelling working and living conditions, intimidation, and wage theft.⁵ Additionally, the Agriculture and Meat industries are reliant on migrant labour, including through programs such as the Pacific Australia Labour Mobility (PALM) scheme. Workers are vulnerable to exploitation through rogue operators participating in these programs and systemic factors that increase their vulnerability.⁶

Risk Scan

Hellers conducted a comprehensive assessment of modern slavery risk in 2021. To ensure we have an up-to-date view of our risks, we engaged an external professional services firm with human rights expertise to provide a modern slavery risk scan for our FY2023 risk profile. This scan serves as a high-level update to our initial modern slavery risk assessment in 2021.

Based on this analysis, Hellers Group’s supplier base and risk profile have not changed significantly in this financial year.

The risk scan provided a snapshot of Hellers Group’s risks of modern slavery in our own operations and supply chain. The scan reviewed FY2023 (July 2022 to June 2023) spend data equal to approximately 80 per cent of Hellers Group’s total spend to identify categories with documented inherent risk of modern slavery based on key research inputs.⁷ We note that the inherent risk of an industry provides insight into potential risks but does not indicate that modern slavery has been identified in Heller’s supply chain.

Through this scan, we identified six high risk categories, including:

Risk categories	Risk factors
Meat processing and ingredients	<ul style="list-style-type: none"> • Prevalence of migrant workers, a vulnerable group • Insecure work, day labourers, casuals, and subcontractors – indicating potential for less worker visibility and increased risk of worker exploitation and forced labour • Workers emanating from Palm Scheme visa programs, creating heightened vulnerability to exploitation
Cleaning services	
Contracting and labour hire	
Construction, repairs and maintenance	

⁴ ‘Food for Thought: The Modern Slavery Act’s Impact in Fresh Food Retail, Wholesale and Agriculture’, Norton Rose Fulbright 2017 www.nortonrosefulbright.com/en/knowledge/publications/9cb18e6c/food-for-thought-the-modern-slavery-acts-impact-in-fresh-food-retail-wholesale-and-agriculture

⁵ Murky Waters: A Qualitative Assessment of Modern Slavery in The Pacific Region. Walk Free, 2020. www.walkfree.org/reports/murky-waters

⁶ ‘Australia is bringing migrant workers back’, Australian Human Rights Institute 2023 www.humanrights.unsw.edu.au/research/commentary/australia-migrant-workers-exploitation-rampant

⁷ These inputs include WalkFree’s Global Slavery Index, International Trade Union Confederation’s (ITUC) Global Rights Index, and the United States State Department’s Trafficking in Persons Report, among other externally produced modern slavery and human rights indexes and research reports.



	<ul style="list-style-type: none"> • Health and safety concerns present, including poor or dangerous working conditions • Materials risk – manufacturing industry and geographies where manufacturing may be located has a higher risk of forced labour practices
Freight	<ul style="list-style-type: none"> • Logistics and shipping industry are a noted area of modern slavery risk – due to presence of vulnerable workers, isolation, and inadequate health and safety standards
Packaging and equipment	<ul style="list-style-type: none"> • Manufacturing is considered to be a high-risk industry for modern slavery, and international manufacturing hubs have higher prevalence of forced labour practices

This risk scan has helped us to identify and prioritise spend categories with the highest potential risk of modern slavery. This will allow us to conduct further due diligence with by developing category management plans in high-risk areas.

Operations

Hellers Group’s operations sits across New Zealand and Australia. These countries are noted in the Global Slavery Index (GSI) as lower risk countries for modern slavery. The most recent GSI data estimate 1.6 per thousand people living in modern slavery for both Australia and New Zealand.⁸ These estimates have increased significantly since the last GSI estimates in 2018, with Australia’s estimate rising by 26,000 people.⁹ This data highlights the importance of undertaking regular evidence-based assessments to ascertain our impact on workers and communities.

In New Zealand, forced labour exploitation has been reported in labour intensive industries such as agriculture, dairy, horticulture, and domestic service industries.¹⁰ Similarly, in Australia, forced labour predominantly occurs in agriculture, domestic work, meat processing, and food services – many industries that rely on migrant workers.¹¹

Hellers Group operates and interacts with several higher risk industries, including agriculture, meat processing, labour agencies, property management services including cleaning and maintenance, logistics and shipping.

Our employee management and document check procedures have not changed significantly since our last statement. Hellers Group ensures all directly employed workers are provided with a written contract in English with clear terms of employment including wage rates and hours of work. We undertake different degrees of document checks of workers throughout the

⁸ See Australia and New Zealand country studies available at walkfree.org. Australia’s estimated number of people living in modern slavery is 41,000, and New Zealand’s estimated number of people living in modern slavery is 8,000, which equals the same number of people living in modern slavery per thousand. Walk Free 2023, www.walkfree.org/global-slavery-index

⁹ GSI 2018 Australia data estimates absolute number of victims of 15,000. Walk Free 2018 www.walkfree.org/global-slavery-index

¹⁰ New Zealand country study, Walk Free 2023 www.walkfree.org/global-slavery-index/country-studies/new-zealand

¹¹ Australia country study, Walk Free 2023 www.walkfree.org/global-slavery-index/country-studies/australia



business, including proof of age. We undertake these checks to confirm workers are allowed to work according to legal standards and applicable organisational policies.

Hellers Group uses labour agencies and sub-contractors to provide workers. We have standard contracts in place with labour agencies that outline our expectations around eligibility to work, pay rates, and required skills and training or certifications. In New Zealand, labour hire agencies are required to sign on to Terms and Conditions which address worker protections, including accuracy of hours recorded to hours worked and excessive working hours. In Australia, all documents are filtered through internal and government checks, including proof of age, right to work and ATO checks. We have a new Australian Human Resources team who are reviewing our use of labour agencies and improving our management of these agencies.

The impacts of the COVID-19 pandemic have contributed to the global increase of worker vulnerability. In FY2022, we reported on multiple initiatives to address COVID-19 impacts with our people and our suppliers. In FY2023, we have adjusted the rules based on the relaxing of restrictions across our different locations. Additional PPE (masks) may still be worn in our own factories for personal concern alongside the mandated PPE. In the first half of FY2023, some staff were infected with COVID-19 from community exposure. Our New Zealand processing sites were impacted during November and December by COVID-19-related staff time off. Our Australian sites were not impacted as badly. Those staff impacted had to isolate at home as per government requirements.

Supply chain

We recognise there are heightened modern slavery risks in our supply chain due to our industry and the nature and locations of our suppliers and the composition of their workforce.

According to the GSI, the Asia Pacific region hosts the largest number of people in modern slavery, at an estimate of 15 million people in forced labour.¹² The impacts of the COVID-19 pandemic and climate change have exacerbated vulnerability across the region and driven more people to migrate in search for work.

While Australia and New Zealand are typically ranked lower risk for modern slavery, domestic agriculture and similar industries in these jurisdictions are considered relatively higher risk for forced labour. This is primarily due to the presence of migrant labour, complex subcontracting arrangements, involvement of international recruitment agencies, and the risk of isolation and physically demanding work.

Hellers sourcing locations by category

	Hellers Australia	Hellers New Zealand
Meat	Locally supplied chicken, turkey and beef.	Combination of imported and local pork, local chicken, local beef, local lamb and local venison. Imported pork is sourced from Poland, Denmark, Spain, Germany, Canada, and the US.

¹² Asia and the Pacific, Walk Free 2023 www.walkfree.org/global-slavery-index/findings/regional-findings/asia-and-the-pacific



Ingredients	All ingredients are purchased locally and are made from both local and imported ingredients. Imported ingredients are sourced from Thailand and China.	Ingredients are sourced both locally and direct from Asia and Europe
Packaging	Sourced locally in Australia and from Asian Hazard Analysis and Critical Control Point System (HACCP)/ISO 22000 accredited suppliers.	Sourced locally and from Asia and Europe from HACCP/ISO 22000 accredited suppliers.

We continue to monitor supply chain modern slavery risks and impacts. Refer to next section ‘Hellers’ actions to assess and address modern slavery’ for information on how we conduct this.

Hellers’ actions to assess and address modern slavery

Key actions taken in the reporting period

Hellers continues to progress against our Modern Slavery Action Plan. In the reporting period, we have:

- Updated our modern slavery operations and supply chain risk assessment with a risk scan
- Responded to the Sedex SMETA Audit Corrective Action Plan at our Jandakot site
- Reviewed and updated Supplier self-Assessment Questionnaires (SAQs) to include more detailed modern slavery considerations

Due diligence and audit

Our Jandakot site in Western Australia has responded to the corrective actions identified in the SMETA audit conducted in FY2022. The site has introduced new supplier approval questionnaires with questions on ethical trading to assess the risk of forced or trafficked labour. The site has taken steps to improve specific health and safety concerns from the audit, including training staff across all shifts in first aid. The next audit will be conducted in May FY2024.

We have updated our supplier SAQ which we detail below. We are working on integrating process for our internal team to flag suppliers for further due diligence based on SAQ responses.

Supplier self-assessment questionnaire update

We engaged an external professional services firm for a review and update of our supplier SAQs. This will help us to develop a consistent approach for understanding our suppliers’ modern slavery risks and controls during new supplier tendering and onboarding, and recontracting of existing suppliers. The questions include consideration of employee management, governance processes, auditing history, health and safety, sourcing including



primary products and country of supply, policies and procedures. This focuses on modern slavery and human rights with some additional ESG factors.

The updated questions will support us to identify areas of modern slavery risk and broader labour rights concerns and areas of improvements to address with our suppliers. These updated SAQs will go out to new suppliers and to existing suppliers during the recontracting process. We are also in the process of consolidating the SAQs used in Australia and SAQs used in New Zealand to be standardised across both countries. Based on our updated risk scan, we will select some suppliers from our high-risk categories and use our updated SAQ to understand their risks and controls.

To support this, we have developed an internal screening and escalation process. This includes material to support our staff to evaluate risks and controls based on supplier responses and action or escalate red flags appropriately. The responsible sourcing escalation process supports Hellers Group staff to have clear steps for escalating suppliers for further due diligence and engagement. We will work to embed this process internally in the next financial year.

Commitment to remedy

We recognise our responsibility to respect human rights and prevent, mitigate and remedy impacts that we may cause, contribute or be linked to. We are committed to working with suppliers to mitigate risks of modern slavery and address issues as they arise. In the event of non-conformance, we will work with the suppliers to remedy the harm caused to people and improve their processes. We would cease a relationship over egregious practices and wilful non-compliance.

Governance and risk management

Our Board is committed to addressing modern slavery risks. We strive to keep our Board and management up to date with our modern slavery actions. During the reporting period we held discussions at the Board level on what modern slavery is, what we are doing to address modern slavery risk, and our modern slavery-related reporting requirements.

At the management level, there is greater management team awareness with Purchasing, ESG and Executive teams fully aware of our obligations to identify, address, and report on modern slavery risks and impacts.

Key personnel managing modern slavery on a day-to-day basis include the CFO (overall responsible), procurement (sourcing and supplier engagement), human resources (recruitment and worker vetting), and site managers.

A modern slavery subcommittee exists which oversees statement preparation.

Policies

We have several internal policies that support our approach to identifying and addressing modern slavery risks in our operations. These policies include:



Policy	Content
Code of Conduct	Our Code of Conduct outlines the expected values and behaviours of our business and employees.
Modern Slavery Policy	Our Modern Slavery Policy supports our commitment to contributing to ending all forms of modern slavery. This policy outlines our approach to reducing the risk of modern slavery practices within our operations and supply chain.
Whistleblower Policy	This policy outlines our whistleblower process and the protections provided to Whistleblowers should they raise a concern.
Diversity, Inclusion and Equal Employment Opportunity Policy	We are committed to an inclusive workplace that embraces and promotes diversity and inclusion. Equal employment opportunity is a fundamental principle of Hellers Group. Employment and progression is based on personal capabilities, experience, and qualifications without discrimination on the basis of every protected characteristic at law.
Corporate Social Responsibility Policy	This policy outlines our commitment to acting responsibly and ethically in all aspects of our business operations, including people and the environment.
Appropriate Workplace Behaviour Policy	This policy includes grievance handling information for employees who feel subjected to any form of unacceptable workplace behaviour contrary to our Appropriate Workplace Behaviour Policy.

Grievance mechanisms

We are committed to investigating whistleblower reports and protecting reporters and suspected reporters from reprisal and victimisation. Our Whistleblower Policy outlines who can make a report and what can be reported, as well as who can receive a whistleblower disclosure. It is the appropriate mechanism for capture of reports related to modern slavery or labour exploitation.

Eligible reporters include: current and former employees (including apprentices and trainees), anyone working for Hellers Group under contract including contractors, subcontractors, labour hire companies, and their employees, and any organisation and its employees who have a business relationship or are otherwise associated with Hellers Group. People can make whistleblower disclosures to our CFO in person, via email or phone, or through our dedicated external service provider Stopleveline.

Stopleveline provides a 24/7 hotline and investigative services to Hellers Group. Workers can access Stopleveline confidentially through a number of channels, including a free call number for New Zealand and Australia, a dedicated email account, and an online portal. Stopleveline also



provides updates on the status of the report and any decisions made around it. Reporters can confidentially access these updates through the platform even if they decide to remain anonymous.

Stopline provides expert forensic investigator support in taking calls and analysing disclosures. When Stopline receives a report, they provide timely reporting of incidents to dedicated representatives within Hellers.

In FY2023, we received no whistleblower reports through our Stopline platform. In FY2024, we will work to raise awareness of our whistleblower processes and policies to our employees and our suppliers.

Outside of our external whistleblower service provider, we have internal processes employees can follow to raise concerns. In FY2023, some Hellers employees raised concerns about changes to the business by getting in contact with the CEO. As part of our investigation, we sought external legal advice to ensure the changes we were making were legal, we then relayed this information to the concerned staff who accepted the findings of the external legal support. While these did not relate to modern slavery or formal grievance mechanisms, they demonstrate that internal complaints can be appropriately triaged and investigated. We encourage a culture where concerns can be raised.

Future actions & commitments

We are progressing the actions and commitments we established in our FY2022 Modern Slavery Statement.

We will continue to work towards the goals outlined below:

Goals	Progress
Review of current supplier onboarding processes including questionnaires	Completed – we have developed new questions around modern slavery and sustainability.
Delivery of modern slavery risk and obligations awareness sessions for management and board	Ongoing.
Address SMETA Corrective Action Plans at our Australia sites	Completed – closed out previous actions.
Roll out of new modern slavery clauses in our cleaning contracts	Not commenced.
Develop standardised due diligence approach to managing labour hire agencies	Ongoing – see ‘Operations’ for detail.
Develop KPIs for modern slavery reporting	Ongoing – see following section ‘Effectiveness of our actions’ for KPIs.
Develop a Supplier Code of Conduct for our suppliers	We are embedding our New SAQ process with suppliers. We will



	review the need for a Supplier Code of Conduct in future.
Embed responsible sourcing escalation process internally	New goal.
Consolidate SAQs across New Zealand and Australia and start rolling out to suppliers	New goal.
Raise awareness of Whistleblower Policy and platform with workers and suppliers	New goal.



Effectiveness of our actions

As we improve our processes to identify and address modern slavery, we recognise the importance of reviewing whether our approach is effective in better identifying and addressing modern slavery, with the ultimate aim of prevention of exploitation.

Aside from measuring whistleblower reports, we did not have set KPIs during the reporting period. We have established two new measures for 2024 and will continue to develop additional measures as we mature our approach.

Effectiveness measure	Outcome
# of whistleblower reports (general)	0 received in FY2023
# of suppliers issued SAQs	New measures – we will report the numbers of suppliers engaged in FY2024
# of suppliers engaged on SAQ responses	

In particular, we will continue to assess suppliers through our SAQs and develop reportable metrics against this program, including how many SAQs are issued.

We note that the key measure we have used to assess the effectiveness of our modern slavery risk management actions is the number and type of reports we receive through our grievance mechanisms. Our third-party grievance mechanism Stopleveline provides us with reports based on the number of reports we receive, their themes, and their outcomes. This data helps us understand the level of awareness in our operations and supply chains of modern slavery, our Whistleblower Policy, and the platform itself. A lower number of reports per 100 people may indicate a lack of awareness or trust in the platform. Since we did not receive any reports in the 2023 financial year, we will look to raise awareness of our platform and process with workers and suppliers so they know when and how to raise concerns. Based on this, we currently measure the number of overall reports to whistleblower, regardless of topic. Should this increase, we will also measure any specific reports relevant to modern slavery.



Consultation

Our Modern Slavery Action Plan was developed with consultation from across the Hellers Group business including subject matter experts from Human Resources, Procurement, Finance and Operations.

Approval and sign off

Our FY2023 Modern Slavery Statement was drafted externally with support from the business and the CFO. The Statement is reviewed in detail by the Modern Slavery Board sub-committee, with the final Statement approved by the Board.

Principal governing body approval

This modern slavery statement was approved by the Board of Hellers Group Holdings in their capacity as principal governing body¹³ of Hellers Group Holdings Limited on 5 December 2023.

Signature of responsible member

This modern slavery statement is signed by Angus Stuart as a responsible member¹⁴ of the Board of Hellers Group Holdings Limited, in their role as Director, as defined by the Modern Slavery Act 2018:

¹³ Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

¹⁴ Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.