



MODERN SLAVERY STATEMENT FY25

HAZELDENE'S CHICKEN FARM PTY LTD

Address 74 Hazeldenes Rd, Lockwood VIC 3551 Australia Mail PO Box 1147 Kangaroo Flat VIC 3555
Phone (03) 5431 1300 Sales 1300 353 300 Fax (03) 5435 3215 Email info@hazeldenes.com.au
ABN 72 004 381 346 ACN 004 381 346

HAZELDENES.COM.AU

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1 Introduction

This statement is prepared as a joint statement on behalf of HCF Holdco Pty Ltd (ACN 653 844 181), HCF Midco 1 Pty Limited (ACN 653 844 805), HCF Midco 2 Pty Limited (ACN 653 845 366), HCF Bidco Pty Limited (ACN 653 847 388) and Hazeldene's Chicken Farm Pty Ltd (ACN 004 381 346) (collectively, **Hazeldenes**) under section 14 of the *Modern Slavery Act 2018* (Cth) (the **Act**) for the reporting period 1 July 2024 to 30 June 2025.

Hazeldenes outlines in this statement the steps it has taken to address the possible risk of modern slavery in its operations and supply chains during the reporting period. It also sets out possible next steps that Hazeldenes may take in the future to continue to seek to reduce the risk of modern slavery.

2 Hazeldenes' Structure, Operations and Supply Chain

2.1 Structure

Each of the Hazeldenes reporting entities are Australian proprietary companies limited by shares with a principal place of business in Lockwood, near Bendigo in Central Victoria. Hazeldenes has other wholly owned subsidiaries within the Hazeldenes' corporate group.

Hazeldenes commenced operations in 1938 (incorporated in 1957) and presently operates a vertically integrated network including farms (both owned and contracted) as well as hatching, rearing and processing facilities located throughout Central Victoria. The business has a large workforce of people in regional Victoria, as well as a smaller workforce of people based in Melbourne. Employees undertake a range of functions including farming, hatching, processing, packing and administration.

2.2 Operations

Hazeldenes' business activities encompass the entirety of the poultry processing cycle, including rearing and laying, hatching, feeding, processing, packaging and distribution. Administrative activities support this cycle and the business has a number of employees in management, legal, procurement, human resources, accounts, sales, engineering, information technology, administration and risk and compliance roles, who manage day-to-day operations.

Further information on Hazeldenes' principal business activities is available on the business' website: <https://www.hazeldenes.com.au>.

2.3 Supply Chains

During the reporting period, Hazeldenes had over 600 suppliers, with Tier 1 suppliers predominately located in Australia but with some material suppliers having global head office or other important business functions (such as manufacturing sites) in Europe, Asia or North America.

Goods and services procured by Hazeldenes include, but are not limited to:

- chicks;
- chicken feed and related milling services;
- various freight services;
- plant and equipment;
- uniforms;

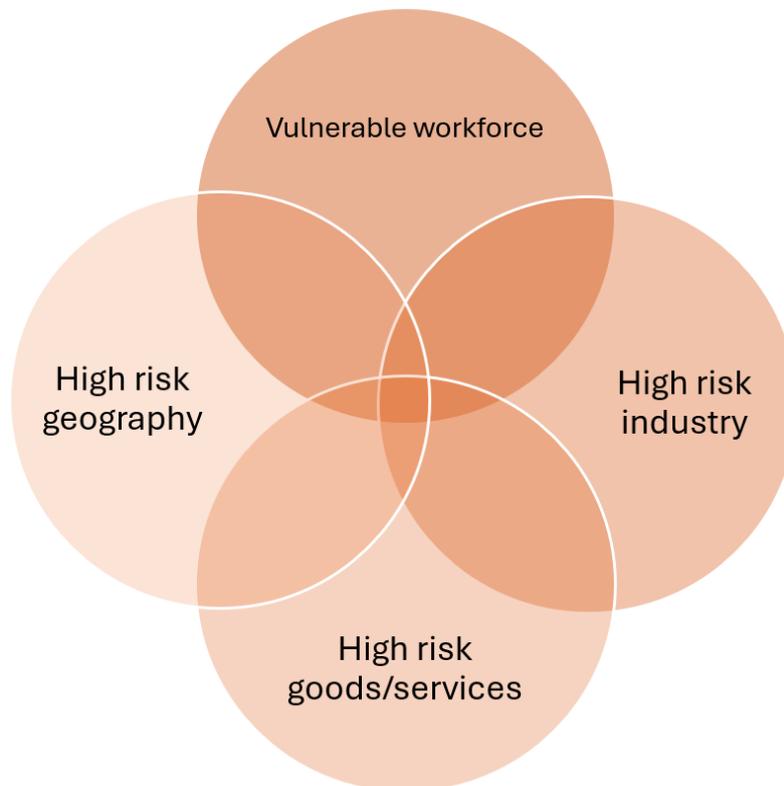
- cleaning and laundry services;
- consumables (e.g. chemicals, packaging, seasoning ingredients); and
- IT equipment and services.

Many of the arrangements Hazeldenes has with its suppliers are stable and long-term, as products and services are generally acquired on an ongoing basis. Hazeldenes periodically reviews its supply chain arrangements to ensure that they remain appropriate and in alignment with Hazeldenes' strategy.

3 Assessing risks of modern slavery

As previously reported, Hazeldenes understands that there are a range of risk factors that may give rise to the possibility of modern slavery risk, which can be summarised as per the following:

Modern slavery risk factors



The greater levels of modern slavery risks exist at the intersection of these risk factors. For example, labour hire would fall within the high risk industry category because it reduces the visibility to the host company of the recruitment practices and employment conditions of the labour hire workers. The modern slavery risks arising from this may then be compounded given that the personnel involved might be migrant or base-skilled workers (i.e. vulnerable workforce).

Hazeldenes has reported in previous modern slavery statements a number of categories of first tier suppliers of goods and services that present higher risks of possible modern slavery practices. These are:

Goods/service	Modern slavery risk
Poultry feed	Supply chains for the ingredients used in production of the business' poultry feed may carry heightened risks of modern slavery because of possible practices which may be associated with some of the ingredients.
Seasonings / inputs to value add products	The pre-made coating, sauces and marinades which Hazeldenes is required by its customers to use in value added chicken products use ingredients that may have exposure to modern slavery risks in their production given the jurisdictions from which they are often sourced (South America, East and Central Asia) can have limited regulation of working conditions or legislative protections for workers' rights, and a high reliance on foreign workers.
Personal protective equipment (PPE)	Hazeldenes is reliant on PPE and protective clothing to ensure the business' products and operations meet the highest applicable health and safety standards, and importantly, to protect its workforce. While Hazeldenes' direct PPE suppliers are currently all located in Australia, it is understood that a large portion of the PPE and protective clothing procured is likely imported from overseas jurisdictions with higher modern slavery risks.
Logistics	Freight distribution, including shipping, is a higher risk industry for modern slavery practices due to the reliance on foreign workers from overseas jurisdictions with less regulation, legislative protections and oversight of workers' rights. While Hazeldenes predominantly uses Australia-based logistics services for its direct freight needs, additional risks may be located in the lower tiers of these suppliers' value chains (for example any products that are imported via sea).
Workforce / labour	<p>The live agriculture and meatworker industries in Australia carry some elevated risks of modern slavery due to the low skilled nature of the work, location and prevalence of migrants or foreign nationals. Similar risks can be present in other labour-based industries such as security services and commercial cleaning industries.</p> <p>In the carrying out of its operations, Hazeldenes utilises labour from a wide range of sources – direct employment, contractors, labour hire - to perform a number of services.</p> <p>Workforce/labour risk is a core focus for Hazeldenes in its efforts to minimise modern slavery risks, particularly given that these workers are physically present on our sites and our ability to exert influence regarding these arrangements.</p>

Hazeldenes acknowledges that this list is not exhaustive and that other goods and services procured by Hazeldenes in the course of its operations may also carry risks of modern slavery in lower tiers of the supply chain for these goods and services.

4 Actions to address the risks of modern slavery in Hazeldenes' operations and supply chain

4.1 Hazeldenes' governance structure and policies and processes

Hazeldenes believes that one of the fundamental steps in effectively addressing modern slavery risks in its operations and supply chain is ensuring that appropriate governance and policy frameworks are established. Hazeldenes has the following governance structure, policies and processes in place.

(a) Hazeldenes' governance structure

Hazeldenes has two internal governance bodies which have been established as part of the business' aim of identifying, addressing and mitigating potential modern slavery risk in its supply chain. These are its Modern Slavery Steering Committee and a Modern Slavery Project Group. The Steering Committee, chaired by the Chief Executive Officer, comprises various senior leadership members of the business and is ultimately responsible for directing and managing the business' modern slavery strategy. The Project Group involves members who are engaged in the day-to-day activity of the business; this Group meets more regularly and is responsible for giving effect to the decisions of the Steering Committee. The Project Group then reports up to the Steering Committee periodically. A responsibility assignment matrix identifying which business functions are responsible or accountable for, or which are to be consulted or to be informed on, modern slavery issues has been established (a "RACI").

(b) Training on modern slavery risks

During the reporting period, Hazeldenes rolled out a toolbox talk on modern slavery risks, including discussing potential signs that may indicate its presence and different ways for workers to report it. This toolbox talk was delivered to teams at the processing site as well as at the business' hatchery and farms. At some sites, cultural leaders of the same ethnicity as a large proportion of the workforce at those sites were also invited to attend and talk to the workers, with the purpose of fostering trust and allowing discussions to be had in a language and cultural setting that may have been more comfortable.

An online training module on modern slavery risks has also been developed, however this was rolled out after the current reporting period. This will be discussed in further detail in subsequent modern slavery statements.

(c) On site posters and collateral

Hazeldenes' recent modern slavery tool box talks have been supplemented by the placing on sites of posters provided by the Australian Red Cross, including in various translated languages to ensure comprehension by workers who may not have a strong grasp of English.

(d) Policies

Hazeldenes has a number of policies which endeavour to mitigate possible modern slavery risks in its supply chain:

Social Responsibility and Ethical Sourcing Policy

Hazeldenes has a Social Responsibility and Ethical Sourcing Policy which sets out the business' commitment to ensuring that employees and agents conduct themselves ethically and with integrity in the course of their employment or engagement. The scope of this Policy applies to all Hazeldenes employees and contractors on all Hazeldenes sites. In addition, the Policy explicitly addresses Hazeldenes' expectations that equivalent standards are upheld by its suppliers, contractors, and business partners. The Policy focuses on employment practices and modern slavery risks by requiring Hazeldenes and its contractors/suppliers to comply with all local laws and regulations regarding labour and employment (including the prohibition on child labour, illegal labour, and forced/bonded labour).

Modern slavery policy

Hazeldenes has a dedicated modern slavery policy, which applies to all of Hazeldenes' operations, supply chains and business activities. The policy expresses Hazeldenes' commitment to seek to avoid modern slavery practices, both directly related to its own business operations and activities but also indirectly by way of suppliers of goods and services. The policy sets out Hazeldenes' expectations that all suppliers avoid modern slavery practices and, to the extent possible, actively implement adequate and appropriate measures to identify, assess and address the risk of modern slavery in their own operations. Although it is expected that all suppliers action the appropriate remediation activities, the policy is clear that remediation should always prioritise the safety of vulnerable people and take into account contextual considerations and potential adverse impacts of any proposed actions.

The policy also sets out a grievance mechanism, setting out a number of a different methods by which concerns around the existence of modern slavery practice may be reported, both internally to the business but also confidentially to the externally managed whistleblower hotline (referenced above).

Code of Conduct

Hazeldenes has a Code of Conduct, which empowers employees and labour hire providers to report grievances, including those relating to modern slavery risks. The Code of Conduct contains an escalation process which employees and labour hire workers can use to escalate concerns.

Whistleblowing hotline

Hazeldenes has in place a whistleblowing hotline which enables employees and other workers on site to make anonymous reports, including in relation to breaches of the Code of Conduct. Hazeldenes aims to empower employees, labour hire workers and others within its supply chain to raise concerns around modern slavery and other poor labour practices, so these may be reviewed and addressed.

Regular communications in Hazeldenes' internal mail systems, notices and posters displayed in strategic locations around its sites, including lunchrooms, make workers aware of the hotline service.

Supplier Code of Conduct

The Modern Slavery Steering Committee introduced a Supplier Code of Conduct for the business, which sets out Hazeldenes' expectations of its suppliers in respect of ethical business practice considerations. Suppliers are required to have policies and processes in place to identify, mitigate

and address any form of modern slavery within their operations and supply chain, including human trafficking, slavery, servitude, forced labour, bonded labour, deceptive recruitment, forced marriage and child labour.

The Supplier Code of Conduct sets out specific obligations on those suppliers who operate within Australia, including the requirement to comply with Australian laws regarding the right to work and the mandatory employment conditions set out in the National Employment Standards and elsewhere at law.

During the reporting period, compliance with this Supplier Code of Conduct was made a default clause in Hazeldenes' standard contracts for the supply of goods and/or services.

Housing standard for labour hire workers

During the reporting period, Hazeldenes undertook some preliminary discussions on its expectations as to the minimum standards of accommodation with which Hazeldenes expects a labour hire provider to comply when providing accommodation to any workers who may be working at a Hazeldenes' site. It is intended for these minimum standards to be the subject of further discussion in following reporting periods as the business looks to refine them, including seeking feedback from other stakeholders.

Next steps

Hazeldenes is committed to taking proactive steps to ensure its governance framework, policies and processes are fit-for-purpose to assess and address modern slavery risks that may manifest within the business' operations and supply chain. Hazeldenes will continue to review its policies, procedures and processes to assess their appropriateness and effectiveness to identify, assess and address modern slavery risks in the business' operations.

Hazeldenes will also move to incorporate compliance with its Modern Slavery policy as a requirement into its standard contracts for the supply of goods and services.

4.2 Due diligence processes

(a) Supplier onboarding

Hazeldenes believes that to effectively mitigate modern slavery practices, in addition to a governance structure which sets out Hazeldenes' expectations, due diligence procedures are also beneficial in ensuring that suppliers continue to adhere to the requirements imposed on them. This is necessary both during the initial on-boarding of the supplier as well as during the term of their supply to Hazeldenes.

Hazeldenes seeks to achieve higher levels of visibility and enforcement of supplier compliance via the following means:

Contractor management system

Hazeldenes has a contractor management system which requires suppliers who enter any site of Hazeldenes to enrol and provide requested documentation. Given Hazeldenes' focus on labour hire providers (whose workforce do come on site) with respect to potential modern slavery issues, this system assists the business in its management of such risk. When onboarding labour hire providers, Hazeldenes requires them to provide a copy of their current labour hire licence, as well as respond to a range of other questions such as source of labour, rates of pay, procedures for visa checks and identification of any relevant employment awards. These are then reviewed thoroughly, and further follow up questions or request for documentation may be issued to the

supplier if required. Incomplete or unsatisfactory responses are flagged as non-compliant and the supplier is not permitted to commence work or labour deployment until rectified.

Standard contractual terms

Hazeldenes' standard contracts for the supply of goods and/or services have clauses that require suppliers to comply with applicable modern slavery legislation and take steps to reduce modern slavery practices in their own supply chains. Material amendments that undermine the effectiveness of these clauses are not accepted in any negotiations with third parties. Hazeldenes also undertakes reasonable steps to require clauses of similar effect to be incorporated into any material supply contracts which are not on Hazeldenes' form.

Modern Slavery Questionnaire

As part of its strategy to improve its awareness of modern slavery risks in its supply chain, Hazeldenes has prepared an initial draft of a questionnaire which is intended to be issued to various suppliers in order to obtain a deeper understanding of their own supply chain, sites of manufacturing, workforce and compliance regimes. In following reporting periods, Hazeldenes will seek to finalise this questionnaire, including seeking feedback from stakeholders and acquiring insights from similar publicly available questionnaires including those issued as possible templates by various governments and government agencies in Australia.

Rolling out such a questionnaire will not only augment Hazeldenes' understanding of supplier practices, but it also sends a clear message to suppliers that this is a key focus for us.

(b) Auditing

Hazeldenes is subject to auditing processes, namely audits conducted by Supplier Ethical Data Exchange (**SEDEX**) under the SEDEX Members Ethical Trade Audit (**SMETA**) Pillar 4 audit scheme. A Pillar 4 SMETA audit was conducted in September 2024, which identified a limited number of non-conformances. Hazeldenes promptly put in place corrective actions, and all non-conformances were closed by January 2025.

In addition to the above, over FY25 Hazeldenes conducted a site inspection of labour hire worker accommodation to check that it was fit for purpose and as a means by which to demonstrate to our labour hire providers that Hazeldenes remain focused on respecting the human rights of all workers, including labour hire contractors.

Next steps

Hazeldenes believes it has made considerable progress with its understanding of and managing the potential modern slavery risks in its supply chain arising from labour hire service providers. As such, and to more fully inform future possible actions, Hazeldenes believes it is timely and appropriate to undertake a refreshed assessment of the potential modern slavery risks in its supply chain. External guidance and support may be relied up on where appropriate.

5 Effectiveness

Considering various measures and frameworks to assess the effectiveness of the policies and processes described previously in addressing potential modern slavery risks is an ongoing process. However, Hazeldenes seeks to ensure its approach to modern slavery risk management is effective via several mechanisms:

- having a clear governance structure regarding modern slavery;

- establishing and maintaining clear policy settings and grievance reporting mechanisms. Hazeldenes believes its modern slavery policy, supported by its whistleblowing hotline, are well placed to deliver this;
- monitoring the completion of relevant modern slavery training by relevant Hazeldenes' staff. The form of training may differ between various cohorts of the workforce – for example, toolbox talks may be more relevant for some cohorts, whilst an online learning module might be more appropriate for others. However, the business has an aim of ensuring all its employees are provided with training on modern slavery risks;
- an ongoing evolution of a 'speak up' culture, where reporting of possible safety issues, bullying, harassment and other misconduct are actively encouraged.
- establishing not less than an annual review of the actions Hazeldenes is taking, to ensure the business' policies and procedures appropriately assess and address modern slavery risks. This would include a discussion on any incidents that may arise from time to time, and any learnings or remediation actions that may arise; and
- continuing to be subject to ongoing SMETA audits.

6 Consultation

Hazeldenes continues to deepen its approach to consultation regarding modern slavery. During the reporting period, there has been a diverse range of conversations, engagement and dialogue via several channels, encompassing:

- discussions by the Board of HCF Holdco Pty Ltd and subsidiaries on modern slavery risks and the business' potential exposure to same;
- similar discussions on a periodic basis by the Modern Slavery Steering Committee and its subordinate Modern Slavery Project Group;
- conducting tool box talks on site to engage workers directly
- consultation with a range of relevant stakeholders, including a not-for-profit organisation with deep experience in this area as well as various community groups, to develop the Hazeldenes' understanding of how modern slavery could be approached and what 'best practice' might look like; and
- engaging with specialists in responsible investment to receive their guidance and input on modern slavery risk management practices and approaches.

This Modern Slavery Statement was approved by the Board of HCF Holdco Pty Ltd as the parent entity of the Hazeldenes group for the purpose of the Act, on 16 December 2025.

Signed by



Anthony Girgis
Chief Executive Officer
Hazeldenes

Signed by



Stephanie Charles
Director of the Board
Hazeldenes