



Modern Slavery Statement

Year Ending 2021



Staughton Group : Our Commitment

Staughton Group values and supports the ideals of the Modern Slavery legislation and intent. The wellbeing of our team, and those of our strategic supply partners is important to us.

We are committed to:

- Identify, understand, and manage our risks by ensuring all strategic supply partners are assessed against these ideals.
- Ensure to the best of our ability that our strategic partners are not associated with modern slavery practices by means of their value offering.
- Develop and promote Staughton Group governance through documented framework, training, and auditing.
- Adopt a continuous improvement approach to these commitments.

This joint statement made by Staughton Group Pty Ltd (ABN 68 619 746 995) includes the following entities for the period January 2021 to December 2021

- Cool Off Pty Ltd (ABN 79 068 308 225)
- Dried & True Pty Ltd (ABN 26 142 227 398)
- Wild Game Resources Australia (ABN 29 623 653 369)

In accordance with the Act, this Modern Slavery Statement is signed and authorised by the entity's principal governing body, Edward Staughton in his role as a Managing Director of Staughton Group Pty Ltd and cosigned by Simon Staughton as Chairman of Staughton Group Pty Ltd on Tue 14 Jun 2022. Consultation occurred with the senior leadership management team of the three entities in the preparation of this Statement.



Signed by

Edward Staughton
Managing Director
Staughton Group Pty Ltd

Simon Staughton
Chairman
Staughton Group Pty Ltd



our values



We love what we do



Never give up, like a dog with a bone



We creatively solve problems



We are honest and deliver on our promises



Together we can be the best

Staughton Group : Introduction

Staughton Group specialises in high-quality food manufacturing, primarily in the pet food market. A fast growing, innovative regional organisation located on the beautiful Murray River, Staughton Group is a dynamic Australian business leading the manufacturing industry.

Comprised of three key entities, and leveraging key strategic partnerships, Staughton Group provides a complete end-to-end manufacturing and logistics solution to businesses in the food ingredient and retail sectors. With experience in food ingredient processing, co-manufacturing, technology development, logistics and engineering, and utilising game meat products through our Wild Game Resources entity, Staughton Group is the definitive partner for all food ingredient manufacturing requirements.

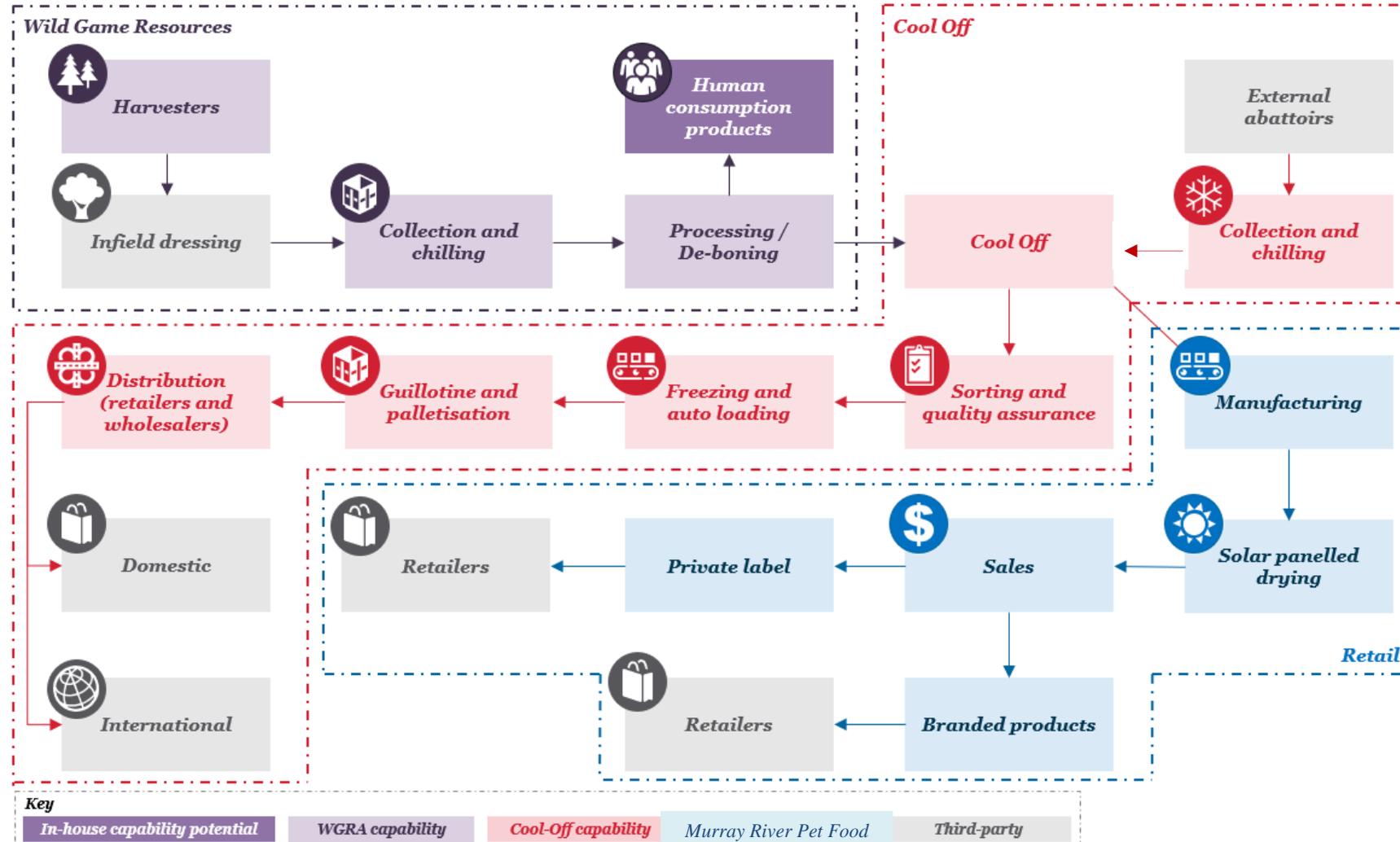
Staughton Group was shaped when one of Australia's first farming families became partners in an offal processing facility. Over 30 years, the group has grown from a meagre waste processing plant to producing the highest quality Australian food ingredients on a large scale now employing over 420 employees.

Through its member entities, Staughton Group strives to maintain its place as the go-to for local and multi-national businesses looking for a partner in food manufacturing.



Staughton Group : Operations

Staughton Group benefit from an established and integrated end to end supply chain, utilising best in class technology to provide security of supply for ingredient and branded retail products.



Staughton Group : Operations



Cool Off Pty Ltd

Cool Off Pty Ltd is Australia's premier producer of pet food raw meat ingredients for pet food manufacturers with a primarily B2B focus. The entity was established as a collector to aggregate and freeze natural fall offal from Australian abattoirs. Cool Off has subsequently expanded operations to include premium meat meal production and mechanically deboned meat. Using the best technology and engineering, Cool Off is able to deliver the freshest raw meat products to pet food suppliers globally.



Wild Game Resources Australia

Wild Game Resources Australia (WGRA) was established in 1952 and was a pioneering force in the establishment of the game harvesting industry in Australia. WGRA procure and distribute Australian wild game meats including kangaroo, wild boar and venison to the domestic and export markets. Starting with a single processing plant WGRA have grown to one of Australia's leading suppliers of game meat and have processing facilities in Walgett New South Wales and St George Queensland. WGRA have established strong domestic and export demand for game meat which provides an opportunity for expansion and innovation within the industry. Working closely with government bodies, export authorities and customers, we are committed to ensuring that a professional approach and high standards are maintained in the field to secure the long term viability of the industry.



Dried & True

Using innovative air drying technology, Dried & True manufactures dehydrated pet treats for the Australian and international markets, through both private label, co manufacturing and standalone retail branded products. With capacity to supply large quantities of premium Australian meat products, Dried & True is constantly expanding and developing new processes to ensure our products are top quality, ground-breaking and accessible to the wholesale and retail markets.

Staughton Group : Supply Chains

Staughton Group engage with a wide range of strategic partners to ensure an exemplary product customer service and product delivery. The following encompass the major procurement areas from raw material supply through to product to customer.

Raw Protein Co-Product Material

A significant portion of our raw protein products are manufactured from Australian human food supply co-products. This includes bovine, ovine, caprine, macropods and fish products. This co-product would otherwise be destined for waste as land fill, or as a high energy use meal product. The repurposing of these co-products provides a mutually valuable benefit to our customers and the environment. Game meat is collected through our accredited Australian sourced supply process.

A small portion of protein material may be purchased from overseas depending on Australian supply availability. Any overseas purchase is transacted through Australian Government agency governance requirements and the supplier audited to ensure alignment of our values so that any risks associated with the entity are mitigated, including modern slavery principles.

Processing Supply

The processing operation engage with a variety of strategic product and service providers. This includes:

- Transport and logistics.
- Production inputs as ingredients and packaging.
- Maintenance and engineering for plant and equipment.
- Chemical and cleaning.
- Team members from both direct and labour hire for processing and associated tasks.
- Team members production personal requirements (e.g. PPE).

The majority of these strategic process supply providers are Australian based. We acknowledge that some of these suppliers may source product from overseas.

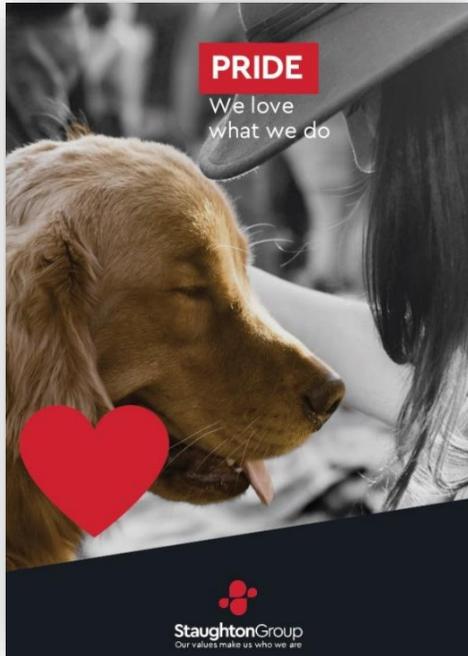
Sales and Logistics Supply Chain

Staughton Group and entity products can be found in many of Australia's supermarkets, pet food retailers, wholesalers, and veterinarian outlets. Our products can pass through a number of third party and storage (ambient and cold storage) providers. Staughton Group also export overseas, mainly into the USA market but also into Asia.

Services Providers

Third Party strategic suppliers also contribute to the overall business function. These include, finance, marketing, co manufacturing and packing, and health providers.

Staughton Group : Risk of Modern Slavery



The 2018 Global Slavery Report gives assurance that Australia is fundamentally a low risk with a 4.27/100 vulnerability to Modern Slavery index, and a low prevalence rate. Staughton Group is committed to ensure assessment of all business partner transactions to identify any slavery activity to reduce this humanitarian risk both domestically and in particular with international procurement and engagement.

Operations Risk

Staughton Group has two manufacturing facilities located in NSW Australia. Howlong and Walgett. Both facilities have on site day to day management teams and recruitment is through a centralised People and Culture resource. Staughton Group employ team members directly, and through labour hire agencies to substitute labour shortages. This includes migrant team members that are employed through approved government processes.

Sector and Industry Risk

It is recognised by Staughton Group that the pet food industry is not regulated by a government body. The industry sector is reliant on the state food authorities to ensure facility suitability for processing. Staughton Group is a member and have board representation on the national industry body (Pet Food Industry Association Australia (PFIAA) to ensure input and currency in industry governance.

Product and Services Risk

The pet food industry risks associated with the modern slavery risk is acknowledged by Staughton Group. The group is mindful of this especially with the sourcing of imported ingredients and the ethical pressure of sourcing food for the human food stream.

Staughton Group through its approval supplier program will continue to request and audit against the risks of engagement in slavery activities and will adjust partnerships and commercial arrangements accordingly.

Staughton Group : Governance

The Staughton Group has embraced a Global Food Initiative certification SQF, and the global ethical registration with SMETA (Sedex Members Ethical Trade Audit) to ensure that the highest of ethical standard is maintained and challenged throughout the organisation. Staughton Group has been members since 2019.

The SEMTA four pillars audit acknowledge

1. Labour Standards,
2. Health and Safety,
3. Environmental Assessment and
4. Business Ethics.

Staughton Group have active governance policy, procedures and systems that support and mitigate against the risk of slavery.

They are as follows

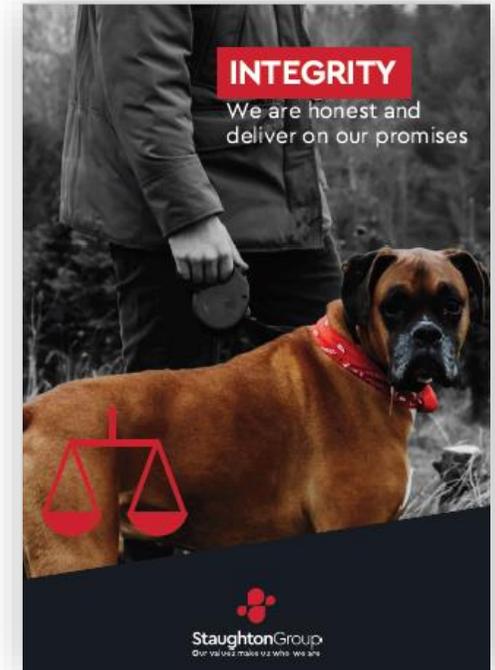
HR_SOP_110 Human Rights Procedure: This procedure outlines Staughton Groups approach to human rights and the standards we set for ourselves and the people with whom we work.

HR_SOP_112 Whistleblower Procedure: Ensuring that the Company has sound procedures to allow all workers and their families to identify and report genuine concerns about illegal conduct or any improper situation pertaining to the Company, without fear of reprisals.

HR_SOP_109 Code Of Conduct: The purpose of this Code is to describe the standards of behavior and conduct expected from workplace participants in their dealings with customers, suppliers, clients, co-employees, management and the general public.

QUAL_SOP_140 Approved Suppliers Procedure: The purpose outlines the requirements to manage suppliers and service providers for the purpose of ensuring safe and ethically sourced products for Staughton Group customers in line with Staughton Group conditions. This includes assessment of the suppliers commitment and evidence of requirements under the Modern Slavery requirements.

These governance documents are audited and reviewed in line with both external and internal requirements and are updated in line with any changes to legislative instruments.



Staughton Group : Consultation and Effectiveness



Consultation

Staughton Group Senior Leadership Group is responsible for the management of all business values across all three entities it owns. This provides the opportunity for engagement and feedback on the preparation of the statement for this reporting period, and improvements for future statements.

The 2021 reporting period provided the opportunity for Staughton Group to consult on internal systems (eg. Approved Supplier Assessment and Program) and a framework to best suit the Staughton Group business and entities to manage the reporting requirements throughout the period.

This will, and has, led to a greater awareness and understanding of the Staughton Group approach and actions that can be taken to manage and reduce the risk of Modern Slavery influences within the supply chain.

The Staughton Group value of Collaboration is a fundamental principle that captures the behavior to consult.

Effectiveness

In order to best determine the effectiveness of the Staughton Group Modern Slavery principles commitment, it is necessary to establish our current state. This will provide our ability to set targets appropriate to our supply chains across all three entities. During the next reporting period Staughton Group will engage in supplier surveys. These responses will provide the ability to identify our supply chains current state and also the priorities to be resourced each of the area of governance, procurement & supply chain, operations, training, grievances and reporting.

Staughton Group will improve and apply the entities cross functional risk matrix to establish the risk rating associated with the Modern Slavery principles, and act on these as priorities as High, Medium and Low. Monthly reporting will then determine the effectiveness of the Staughton Group Modern Slavery Framework to the Senior Leadership Team and the entity's principal governing body.

Staughton Group : The Future Ahead

Staughton Group will in the next reporting period continue to strengthen addressing the governance that supports the Modern Slavery Act 2018 requirements and the intent of the law.

This will be evident in the development of a Supplier Code of Conduct which will embed a heightened focus on our moral and ethical obligations to the communities that may be impacted by our business transactions.

Training for Staughton Group team members across all three entities will be enacted to provide awareness of the requirements and how Staughton Group are meeting both legal and moral obligations in relation to the Modern Slavery principles.

The reporting period will also focus on business sustainability to enhance livability; create opportunities for economic prosperity; foster environmental responsibility; embrace design excellence; and demonstrate visionary leadership and strong governance. This will support the ongoing commitment to the welfare of our global community.

