



MODERN SLAVERY STATEMENT 2020



SunPork
Group



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100% AUSSIE PORK ON AUSSIE PLATES



We produce **900,000** pigs per year



We employ **1,400+** Staff



We provide **18%** of Australian Pork



3% of our animal care staff are on the autism spectrum

Registered Office:
SunPork Group
Level 1, 6 Eagleview Place
Eagle Farm, QLD 4009

section 1



Identify the Reporting Entity

This Modern Slavery Statement ('the statement') has been developed in accordance with the Commonwealth's Modern Slavery Act 2018 for the financial year ending 30 June 2020.

This statement has been prepared by SunPork Group and is joint statement for two reporting entities:

1. SunPork Pty Ltd (ACN 059 168 786) and its wholly owned and controlled subsidiaries
 2. SunPork Fresh Foods Pty Ltd (ACN 135 230 545) and its wholly owned and controlled subsidiaries
- SunPork Pty Ltd and SunPork Fresh Foods Pty Ltd each have an annual turnover exceeding \$100M for financial year ending 30 June 2020 (FY2020) and with shared supply chains this statement has been prepared jointly.

- This statement, which is intended to meet the requirements of section 16 of the Modern Slavery Act 2018 (Cth) outlines the steps taken by SunPork Group during FY2020 to seek to minimise the risk of modern slavery occurring in our businesses and supply chains.

To find out more about the nature of our business, you can visit sunporkfreshfoods.com.au

This statement was approved by the Board of SunPork Group including reporting entities SunPork Pty Ltd and SunPork Fresh Foods Pty Ltd on 26 November 2020.

A handwritten signature in black ink, appearing to read "R. van Barneveld", is written over a horizontal line.

Dr Robert van Barneveld
Group CEO and Managing Director

section 2

Structure, Operations and Supply Chains

The SunPork Group is one of Australia's largest pork producers. We are 100% Australian owned and Australian farmed. We produce exceptional pork products by controlling the value chain, with superior genetics and sustainable farming practices which produce only the best quality pork for Australia.

SunPork products are produced and processed in Australia with distribution to domestic and international markets. We supply 42 million Kg of pork annually including 39 value-add products. We distribute to 1,700 supermarkets worldwide and export 7 million Kg of pork to 7 countries.

We have 37 Australian farms in 3 states (Queensland, New South Wales, and South

Australia) and 6 New Zealand farms on 2 islands. We also have 3 feedmills, 2 abattoirs and 2 value-add facilities.

Through our own organisation and external supply chains we source genetic and raw materials, components, and services.

Our supply chain comprises the procurement of pork production and processing inputs which are then transformed into SunPork's three main product categories – pork, genetics and processing by-products.

In FY2020 the SunPork Group interacted with more than 2000 external vendors across our supply chain.



Our Business

- Labour and corporate services
- Animal feed and nutrition products
- Animal health products
- Packaging products
- Engineering, construction and fabrication services
- Maintenance spares and services
- Energy and Utilities
- Transport services
- Operations support services

section 3



Risks of Modern Slavery Practices in our Operations and Supply Chains



Potential Modern Slavery Risk or Potential Indicators of Modern Slavery

Sectors or Industries at Higher Risk

Internal Supply Chain
(our operations)

Exploitation of migrant workers
Deceptive recruitment
Underpayment of wages
Excessive working hours

Functions within SunPork at higher risk:

Labour hire - farms, processing facilities.

External Supply Chain
(our suppliers)

Bonded (debt) labour
Exploitation of migrant workers
Deceptive recruitment
Underpayment of wages
Excessive working hours

Grain, animal nutrition products; animal health products; value-add processing ingredients, clothing, packaging, construction; electronics, cleaning; storage and distribution, transport, trade services, security services, labour hire.

We are committed to continuously improving our risk identification capability.

section 4

Actions Taken in FY2020 to Assess and Address Those Risks

SunPork Group commenced review and implementation of internal policies and initiatives across our operations that aid in assessing and addressing potential risks of modern slavery. Initiatives that commenced in FY2020 include:

Supplier Mapping and Analysis:

Appointing a dedicated continuous improvement resource to oversee a group-wide analysis of vendors across all supply chains.

Purchasing Policy Consultation and Development:

A common Purchasing Policy developed in consultation with our subsidiary members to ensure that the services and goods we acquire are the result of transparent, objective, time and cost-effective decision making and risk management. Embedded in our Purchasing Policy will be proactive processes to build awareness of Modern Slavery Act 2018 and encourage compliance. Consultation continued in FY2020.

Workplace Grievance and Investigations Protocol:

Our Resolving Workplace Issues Protocol was developed for all employees. It (i) outlines what constitutes a workplace grievance for the purposes of communicating a clear definition to employees; (ii) identifies a step-by-step procedure for seeking a resolution to the workplace grievance; and (iii) sets out a process after arriving at a resolution.

Whistleblower Policy and ‘Speaking Out’ Hotline:

Development of our Whistleblower Policy and introduction of an independently managed telephone hotline for all employees to raise what we call a ‘speaking out’ complaint. Stopleveline is an independent Australian company which specialises in providing integrity and whistleblowing services. Employees are encouraged to report instances of suspected unethical, illegal, fraudulent or undesirable conduct involving the business, up to and including animal welfare concerns.

Diversity Policy:

True to a diverse working environment, SunPork does not elevate one form of diversity over another. Age, ethnicity, cultural background, sexuality, gender and physical and intellectual manifestations contribute equally to the diversity of our employees. Our policy was launched in FY2020. It defines diversity and sets out procedures for (i) recruitment, selection and promotion; (ii) talent and succession planning, and (iii) career development.

Preventing Sexual Harassment, Bullying and Discrimination Policy:

We believe that all employees have the right to work in an environment that prohibits discriminatory practices and is free from inappropriate behaviour. We strive to provide a safe and healthy workplace through a zero-tolerance approach to harassment, bullying and discrimination. This policy provides requirements regarding inappropriate workplace behaviour, including sexual harassment, bullying and discrimination; guidelines about our role in preventing such conduct; and our procedures for reporting, investigating and resolving such matters.

Worked with reputable Labour Hire Companies and Engaged a Registered Migration Agent:

SunPork's workforce proudly comprises local and migrant workers. To ensure that we are providing the best support for all employees we engage reputable recruitment agencies as well as a qualified Immigration Lawyer and Registered Migration

Agent specialising in employer based temporary and permanent migration including company specific and industry labour agreements.

SunPork Group Code of Conduct:

Our Code of Conduct will provide a clear and unambiguous framework within which all directors and employees are expected to operate. It will emphasise our absolute commitment to employee health and safety, minimising our environmental footprint, working with the local communities that we operate within. At SunPork, there is an expectation that all employees, contractors and stakeholders act in accordance with our values, policies and local procedures.

Annual Wage and Award Reviews:

Every year we review relevant awards and enterprise agreements across our operations to ensure compliance and that our employees are correctly remunerated.

Participated in Human Rights Reporting and Assessments:

Through members of our internal supply chain, we reported under SEDEX Members Ethical Trade Audit Report and Supplier Workplace Accountability (SWA) Assessment which requires us to demonstrate our commitment to respecting human rights.



section 5

How we assess the effectiveness of such actions

SunPork will measure its effectiveness in mitigating slavery across our operations and supply chains by:

Conducting a review of our modern slavery statement and internal policies that support compliance;

Communication with our supply chain to ensure their understanding of, and promote compliance with, our expectations;

Implement plans to monitor and review the effectiveness of our modern slavery risk management framework and processes; and

Establish regular reporting to the SunPork Group Board and Executives to support transparency, accountability and ensure conformance to requirements.



section 6

Consultative process across SunPork Group

We are developing and implementing consultation mechanisms which encourage cooperation and engagement of employees and management.

In FY2020, SunPork Group commenced the development and implementation of internal initiatives across our operations that aid in identifying potential risks of modern slavery.

These initiatives are being developed in consultation with SunPork Group stakeholders.

section 7

other informatoion

Nil



SunPork Fresh Foods
1/6 Eagleview Place, Eagle Farm QLD 4009

