



Modern Slavery Statement FY2021

Modern slavery, in particular human trafficking, is an international problem and takes a number of forms, including exploitation, forced labor and domestic servitude.

At Turosi Pty Ltd ('Turosi') we acknowledge we have a responsibility in playing a role in eradicating modern slavery. Turosi believes in the fair treatment and remuneration of employees. We comply with all applicable employment legislation and industrial instruments and no employee is paid less than the minimum wage. Turosi also invests in the safety, health and wellbeing of its staff.

Turosi has in place a number of policies aimed at helping to identify and mitigate the risk of modern slavery in our business and supply chains. This includes a Whistleblower Policy to enable our employees to speak up against any misconduct, breaches of legislation, criminal activities or unethical behavior.

These policies set out Turosi's expectations of how representatives should relate to one another including how we employ people and abide by current employment laws, and also our expectations of suppliers.

Turosi seeks to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. Turosi expects the organisations it deals with to have ethical workplace practices, where staff are treated fairly, equally and remunerated in accordance with the law.

This Modern Slavery Statement relates to our actions and activities for the financial year ended 30 June 2021 and complies with the mandatory reporting requirements for modern slavery statements in line with the Modern Slavery Act.



Phil Hand
Chief Executive Officer

Mandatory Reporting Criteria

Requirement

1. Identification of the reporting entity
2. Turosi's reporting structure, operations and supply chains
3. Description of modern slavery risks in Turosi's operations and supply chains
4. Description of actions taken by Turosi, Governance and Due Diligence
5. Effectiveness of these actions
6. Consultation process
7. Other relevant information

1. Identification of the reporting entity

This statement relates to the responsibilities of Turosi and all its facilities as identified in [Appendix 1](#). It ensures that the company follows similar policies and procedures to undertake effective steps to identify and remove contemporary slavery.

This statement is approved by the Turosi Board of Directors.

2. Turosi's reporting structure, operations and supply chains

Structure

Turosi is a privately owned, leading food manufacturer and supplier of fresh poultry and prepared food solutions.

Turosi is a result of a merger between two family companies with like-minded values and future goals. Each party has a long standing reputation for producing food products to the highest quality standards.

With approximately 1,500 employees, Turosi is one of Australia's largest food manufacturers, strongly committed to delivering safe products of a consistently high quality together with exemplary customer service to a broad range of customers including major retailers, Quick Service Restaurants (QSR's), food service distributors and wholesalers.

As well as operating a number of food manufacturing facilities located around Australia, Turosi is also one of Australia's largest producers of poultry.

Operations and supply chains

Turosi is a vertically integrated business covering every stage from the farm to the table. We source our goods and services from over 200 suppliers which predominately consists of feed, packaging, ingredients, consumables and uniforms. Some of the services we access are for cleaning, freight, waste management and network and communications to name a few. The majority of our suppliers are based within Australia, however there is a small minority of goods that are sourced from overseas.

At Turosi we are a total food solutions group. We therefore have the capability of producing a wide range of products covering all proteins including chicken, beef, lamb, pork, seafood as well as vegetable and cheese products. We source all of our raw materials from reputable and high quality producers to ensure our products are of the highest quality and standard.

The Turosi website at <https://turosi.com.au/> will provide you with a greater understanding of the business, our products and people and the areas we operate and customers we supply.

Predominately our operation consists of:

1. Farming:

- a. Breeder Farms - Turosi has fifteen breeder farms. These farms are located at Pakenham, Nagambie, Benalla, Bannockburn, and Anakie in Victoria.
- b. Hatcheries - Eggs are transported from breeder farms to purpose built facilities for incubation and hatching. Turosi has two hatcheries, located at Bannockburn and Fiveways (near Cranbourne) in Victoria.
- c. Broiler Farms – Turosi manages one broiler farm but also contracts out to approximately 80 contract growers who grow chickens for us. All broilers grown by Turosi (whether our own or contract growers) meet the Australian standards for welfare and are grown under strict bio-security guidelines. The ethical treatment of our animals is one of our highest priorities.

2. Primary Processing:

- a. Turosi has two poultry processing plants:
 - i. Turosi Geelong which is located at Breakwater, Geelong, Victoria and produces poultry products which are mainly distributed through major supermarkets, independent supermarkets, Quick Service Restaurants, as well as many other chicken outlets. There are approximately 400 people employed at the site.
 - ii. Turosi Thomastown which is located at Thomastown, Victoria. This facility supplies mainly charcoal chicken outlets and specialty chicken stores and distributors. Approximately 350 people are employed at the Thomastown plant.

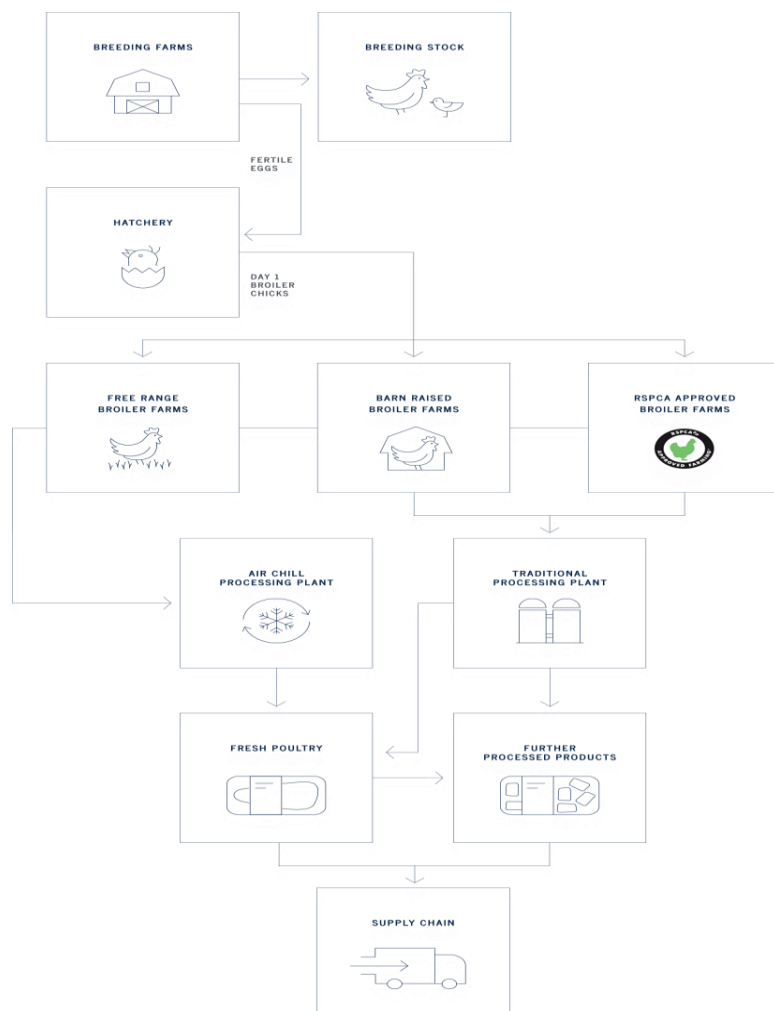
3. Value Added Processing:

- a. Turosi has two value added processing plants where products are manufactured at one of our state of the art facilities in Broadmeadows (230 employees), Victoria as well as Eagle Farm (250 employees) in Queensland. Our product range categories includes snacks, Meal Solutions, Fully Cooked, Par Cooked or Sous Vide Products.

4. Distribution:

- a. Warehousing and distribution of poultry products to our customers.

Turosi’s fully-integrated operating model



3. Description of modern slavery risks in Turosi’s operations and supply chains

Operations

At Turosi we consider that we are a low risk of modern slavery practices as we have no operations outside of Australia.

The vast majority of employees employed at Turosi are employed directly. At our Processing and Value Added facilities we undergo regular external audits from our customers to verify the working conditions, hours and pay rates our employees are employed under. Employees directly employed are covered by modern awards as well as Enterprise Agreements which are certified by the Fair Work Commission in Australia and agreed to by the applicable trade union covering the employees. The award stipulates the minimum conditions for an employee but are then ‘topped up’ by the various enterprise agreements which are negotiated between Turosi, the

employees and the employee’s representative, which is usually a trade union. Some of the key areas addressed by the award and agreement are wages, hours of work, overtime conditions, additional remuneration, leave entitlements and redundancy conditions. Where the relevant employees are not covered by an enterprise agreement, they are typically employed under the terms of a modern award, on above award wages. For more senior positions, they are engaged under the terms of a common law contract which is well above the minimum conditions. All Australian employees remain subject to the minimum conditions in the National Employment Standards (NES) and the Fair Work Act 2009 which is regularly reviewed. These conditions are supported by a range of policies and procedures providing additional benefits. Turosi’s employment practices comply with all federal, state and local laws within Australia.

Our recruitment processes are strongly supported by Turosi’s policies and procedures. Employment decisions are made on the principle of merit, with no instances of forced labour. All employees are required to demonstrate their legal right to work in Australia. For those employees who hold authorized visas, Turosi regularly checks against the immigration status of workers by using the **Visa Entitlement Verification Online system (VEVO)**. VEVO is an online system that stores visa information of persons holding Australian visas. Turosi accesses this online system to check the details and entitlements of an employee’s visa. This ensures that an employee’s visa is still valid and any other limitations that may be placed on their visa.

In Queensland, Victoria and New South Wales our labour hire workers are sourced from appropriately licensed agencies. The labour hire agencies are engaged with terms of agreement. Labour hire workers are either employed on the wage rates and conditions of the site enterprise agreement where they work or the modern award conditions. Turosi receives a regular report from labour hire agencies they use where employees are visa holders to ensure that their visa is valid and any limitations on their working visa are met – this is done through the VEVO online system. From 2022, Turosi will randomly audit selected labour hire agencies and labour service providers (cleaning contractors, clothing contractors, etc..) to ensure compliance with all relevant workplace and immigration requirements.

Supply Chains

Turosi sources its products and services predominately from within Australia with minimal products coming from overseas.

Turosi maintains a high ethical standard across its operations. It’s our policy to ensure that the ethical standards that apply within our own business are also adhered to in our supply chain. The identification of risk within our supply chain is a key initial step in understanding what’s required and prioritising actions.

While Turosi predominately sources goods and services from within Australia, there are most likely inherent risks further down the supply chain. There may be situations where service or product supplied to Turosi by an organisation doesn’t breach any modern slavery requirements, however if the organisation sourcing the products is getting them from overseas, this could be identified as a potential risk. An example could be the purchase of electronic equipment. Turosi may be purchasing from a reputable supplier within Australia, however the item or components may be manufactured and produced overseas where modern slavery practices may be breached.

At Turosi all sites operate a Supplier Assessment Program which incorporates **Vulnerability Analysis Critical Control Points (VACCP)** and **Threat Analysis Critical Control Points (/TACCP)**.

While these tools are predominately food protection focused and used to mitigate food fraud/tampering, the current questionnaire does address social workplace accountability which does talk about their employees being legally able to work in Australia, paid the minimum wage, employees are appropriately trained, contracts comply with Australian laws, etc.... We will review the questionnaire to determine if there needs to be further information to address modern slavery requirements.

4. Description of actions taken by Turosi, Governance and Due Diligence

While most of our suppliers are predominately Australian based, we have still identified risks that could be present with goods and services that is supplied to Turosi.

RISK	ISSUE	ACTION
IT Equipment which can include computer components, mobile phones, laptops, etc...	Possible risks may be: <ul style="list-style-type: none"> • forced labour is used to manufacture • below minimum wages paid • Unsafe work conditions 	<ul style="list-style-type: none"> • Suppliers of IT equipment will complete the Supplier Assessment Questionnaire answering questions around sourced IT equipment • IT suppliers will receive a letter from Turosi which will outline third part requirements with regard to modern slavery.
Outsourced Cleaning contractors cleaning Turosi facilities	Possible risks may be: <ul style="list-style-type: none"> • forced labour is used • below minimum wages paid • Conditions of staff visa requirements are met and not exploited • Employment conditions not met 	<ul style="list-style-type: none"> • Service suppliers will complete the Supplier Assessment Questionnaire • Service suppliers will receive a letter from Turosi which will outline third part requirements with regard to modern slavery.
Some ingredients and packaging that is sourced from overseas.	Possible risks may be: <ul style="list-style-type: none"> • forced labour is used • below minimum wages paid • Conditions of staff visa requirements are met and not exploited • Employment conditions not met 	<ul style="list-style-type: none"> • Get suppliers to complete the Supplier Assessment Questionnaire • Suppliers will receive a letter from Turosi which will outline third part requirements with regard to modern slavery.

Operations

Turosi has in place a number of policies aimed at helping to identify and mitigate the risk of modern slavery in our business and supply chains.

Turosi seeks to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. Turosi expects the organisations it deals with to have ethical workplace practices, where staff are treated fairly, equally and remunerated in accordance with the law.

Turosi has certain policies in place to assist in ensuring that modern slavery is not taking place in its business or operations. An example of such policies is:

- **Recruitment Policy and Procedures:** all recruitment and selection procedures and decisions will reflect Turosi's commitment to providing equal opportunity by assessing all potential candidates according to their skills, knowledge, qualifications and capabilities. No regard will be given to factors such as age, gender, marital status, race, religion, physical impairment or political opinions.
- **Whistleblower Policy:** recognises the importance and encourages the reporting of potential misconduct or a potential improper state of affairs relating to the Company. Amongst other things, reporting draws attention to issues and allows them to be addressed before they create a significant risk to the Company. It also supports the Company's long-term sustainability and reputation. This policy is an important tool that will help the Company to identify wrongdoing or risk. It also supports ethical and responsible corporate behaviour.
- **Code of Conduct:** describes Turosi's principles of business conduct and basic legal and ethical obligations which bind all employees of Turosi. The code provides guidelines for acceptable behaviour in ethical decision making, addressing issues such as compliance with laws and regulations and the reporting of unlawful and unethical behaviour. We have a commitment to core human and labour rights, fair compensation, the prevention of child labour and forced labour, freedom of association and other employment requirements and standards.
- **Remuneration Policy:** is in place to ensure that Turosi appropriately compensates employees for the services they provide. Turosi determines their remuneration in a way that ensures a level of equity and consistency across the Company and complies with all legal requirements.
- **Engagement of Foreign Workers Policy:** where Turosi employs a foreign worker, we ensure that the foreign worker is employed in strict accordance with any conditions on their visa, including but not limited to, remuneration and hours of work per week. Turosi sites employing foreign workers must maintain records relating to an employee's legal right to work in Australia at all times during the employment relationship.
- **Harassment and Bullying Policy:** Turosi is an equal opportunity employer and is committed to providing a harassment, bullying, and victimisation free workplace where all people are treated with dignity, courtesy, respect, and fairly on the basis of individual merit.

Other steps Turosi takes to prevent and protect against modern slavery include negotiating Enterprise Agreements with the relevant operational sites and providing all employees with the right to bargain their employment terms and conditions.

Supply Chains

Turosi has a zero tolerance approach to slavery and human trafficking and we make clear our expectations of suppliers, including adherence to the Group’s policies outlined above irrespective of whether it is an explicit contractual term.

Our policies and Supplier Program define the standards of behaviour expected of all associated with Turosi, including suppliers. These policies set out Turosi’s expectations of how representatives should relate to one another including how we employ people and abide by current employment laws, and also our expectations of suppliers.

When on-boarding’ new suppliers Turosi will endeavor to obtain copies of the supplier policies on employee and supplier conduct. This way, Turosi can ascertain what actions suppliers take to ensure that slavery and human trafficking do not occur in their business.

Turosi seeks to ensure that its Services Agreements with third parties contain provisions with respect to the treatment of those parties’ employees. To this end, we are updating our supplier expectations by including a checklist (***Ethical Sourcing Self-Assessment***) to ensure they comply with modern slavery requirements.

5. Effectiveness of these actions

Our policies and Supplier Program define the standards of behaviour expected of all associated with Turosi, including suppliers. These policies set out Turosi’s expectations of how representatives should relate to one another including how we employ people and abide by current employment laws, and also our expectations of suppliers.

Turosi undergoes a number of external audits from different customers and organisations that amongst other things, also focuses on employment practices. These audits interview employees, check pay and time records as well as ensuring that Turosi have employees right to work visa information. Some of the organisations who audit our operations are McDonalds, Coles, Woolworths, KFC, Ikea, etc.... Turosi has passed all external audits carried out by external third parties at our premises.

Our Whistleblower program is an important aspect of our reporting system through its anonymity and confidentiality. Managed by an external organization, we recognise the importance and encourage the reporting of potential misconduct or a potential improper state of affairs relating to the Company by our employees. This program is an important tool that will help the Company identify wrongdoing or risk. It also supports ethical and responsible corporate behaviour. Turosi received a minimal number of whistleblower complaints throughout the year and none of those complaints were found to be breaching any modern slavery regulations.

Our Whistleblower program is supported by posters and flyers across the organization as well as incorporated in to training around bullying and harassment. All Turosi employees have been made aware and trained on the Whistleblower program. All whistleblower issues are reported to the Chief Executive Officer (CEO).

Any labour hire providers that Turosi has used are subject to verification of their labour hire licenses where applicable as well as a regular review of pay rates, hours worked and employment contracts through external audits. The relevant documentation is provided to the auditors and to date, all labour hire providers have met audit requirements for their staff.

6. Consultation process

Turosi has involved its key management teams – Compliance, Finance, Technical (consists of Environment and Quality Assurance), Human Resources and Supply Chain, in order to prepare and complete this Statement.

7. Other Relevant Information

While Turosi is confident that as a result of all of the external audits conducted at Turosi facilities we meet the modern slavery requirements for our immediate business operations, there is still some work that needs to be done across all of our suppliers in the supply chain area. This includes:

- Ensuring that all suppliers receive a Turosi letter outlining the modern slavery requirements and Turosi's expectations for their business, and
- Broadening the number of suppliers that the ***Ethical Sourcing Self-Assessment*** questionnaire goes out to.

By focusing on the above, this will ensure that we as a business are reasonably confident that the suppliers we source our goods and services from are meeting the modern slavery requirements.

Appendix 1

Head Office

Turosi
5 Lipton Drive
Thomastown, Vic 3074

Manufacturing Facilities

Thomastown
5 Lipton Drive
Thomastown, Vic 3074

Broadmeadows
6 Military Road
Broadmeadows, Vic 3047

Lavarack (Qld)
164 Lavarack Avenue
Eagle Farm, Qld 4009

Geelong
41-47 Leather Street
Breakwater, Vic 3216

Eagle Farm (Qld)
26-28 Qantas Drive
Eagle Farm, Qld 4009

Farming Operations

Bannockburn Hatchery
449 Burnside Road
Bannockburn, Vic 3331

Nagambie Farms
McDonald Locksley Road
Nagambie, Vic 3608

Pakenham Farm
247 McGregor Road
Pakenham, Vic 3810

Cranbourne Farm
1580 Thompson Road
Cranbourne East, Vic 3977

Fiveways Hatchery
220 Fisheries Road
Devon Meadows, Vic 3977

Myers Farms 1 & 2
600 Stewarton Road
Stewarton, Vic 3725

Anakie Farm
35 Pringles Road
Anakie, Vic 3213

Distribution

Turosi Sydney
Unit 2, 34-36 Whyalla Place
Prestons, NSW 2170

Lavarack (Qld)
164 Lavarack Avenue
Eagle Farm, Qld 4009