

**THOMAS** **FOODS**<sup>®</sup>  
INTERNATIONAL



**FEEDING FAMILIES GLOBALLY**

PROUDLY AUSTRALIAN & FAMILY OWNED SINCE 1988

**2023**

# **MODERN SLAVERY STATEMENT**

**FAIR WORK CONDITIONS • RIGHT TO REPRESENTATION • UNIVERSAL HUMAN RIGHTS  
EQUAL PAY FOR EQUAL WORK • SAFE WORK CONDITIONS**

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## STATEMENT FROM THE CEO AND MANAGING DIRECTOR

Thomas Foods International (TFI) is a family business founded and built upon strong family values.

We are committed to ethical and socially responsible business practices which encompass **human rights**, as defined in the *United Nations ('UN') Universal Declaration of Human Rights*, the fundamental labour standards established by the *International Labour Organisation ('ILO')* and relevant *ILO Conventions*, fair and safe working conditions, environmental compliance, and ethical behaviour. TFI adopts the Australian Attorney General's Department definition of "modern slavery", which includes human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and child labour.

We strive to identify, monitor and mitigate modern slavery risks and to remain free from exploitation, discrimination, bullying, harassment, or the marginalisation of others. We also celebrate our diversity and treat each other as equals, regardless of background or circumstance.

TFI is respectful and supportive of the communities in which we work and partner. We work in close collaboration with local communities and businesses, acknowledging and upholding local customs, and remaining sensitive to cultural needs and requirements. We expect our suppliers, customers and stakeholders to share and demonstrate the same commitment.

Over the past twelve months, TFI has continued to experience significant change throughout our business. We have continued to operate with a long-term approach and continue to consistently invest in activities that reduce our risk, increase transparency, and ensure accountable to our community and

stakeholders. Our actions this year have included developing and refining our processes and procedures, hiring new staff, particularly in the sustainability and HR areas, and development of the Board-approved modern slavery **Forward Strategy**.

It is our great honour to lead and work alongside an exceptional team that goes about its business with integrity, responsibility, and compassion. We look forward to upholding our company values and traditions, and in doing so, continuing to prevent, detect and mitigate the risk of modern slavery in our operations and supply chains.



Darren Thomas  
Group Managing Director

A handwritten signature in dark ink, appearing to read 'Darren Thomas'.

Signature



Anthony Stewart  
Group Chief Executive Officer

A handwritten signature in dark ink, appearing to read 'Anthony Stewart'.

Signature

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## ABOUT THOMAS FOODS INTERNATIONAL

TFI is Australia’s largest family-owned food business – producing, processing, distributing, and selling premium meat and seafood all over the world. The consolidated group of companies operates in Australia, the United States, Canada, China, Japan, Singapore, the Netherlands, Dubai, and the UK. TFI’s global presence continues to successfully grow and develop.

Our mission is to **feed families globally** through premium quality food products, exceptional customer service and sustainable, innovative practices.

As a family business, we are driven by our strong core values. Our commitment to providing the best customer service is only matched by our commitment to consistently high-quality products. With strict hygiene and handling standards and a fierce belief in doing things the right way, we never compromise on quality.

At TFI, we are acutely aware of our responsibility to the people and communities with whom we work and partner, and the livestock upon which our livelihood depends. Human rights, worker safety and well-being, animal welfare, environmental sustainability and corporate social responsibility are all part of the fabric of our business -integrated into everything we do.

## THE REPORTING ENTITY

Thomas Foods International Consolidated Pty Ltd (ABN: 20 105 099 849)

TFI is pleased submit its third *Modern Slavery Statement*.

For the purposes of this joint *Modern Slavery Statement* (the ‘*Statement*’) the group reporting entity is Thomas Foods International Consolidated Pty Ltd (TFIC), a privately-owned company operating out of and registered at Level 2, 162 Fullarton Rd, Rose Park SA 5067. This statement is made pursuant to Section 54(1) of the UK *Modern Slavery Act 2015*, and Section 14 of the Australian *Modern Slavery Act 2018 (Cth)*. The Statement was approved by the Board on the 24<sup>th</sup> January 2024.

This joint *Statement* covers the following reporting entities, operating as a part of the TFI group, under TFIC:

- Thomas Foods International Stawell Pty Ltd (ABN 69 004 967 800)
- Thomas Foods International Australia (TFIA) (ABN 94 007 939 424)
- Thomas Foods International Pty Ltd (TFI) (ABN 52 008 178 121)

## REPORTING REQUIREMENTS

As an international business, the TFI group is subject to multiple jurisdictional compliance requirements. The relevant legislation this *Statement* addresses are as follows:

### Australia

- *Modern Slavery Act 2018 (Cth)*
- *Modern Slavery Act 2018 (NSW)* - requirements met if reporting under the Commonwealth Act.



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Australia has legislated mandatory reporting requirements for reporting entities. The disclosure format and structure is guided by a mandatory reporting criteria, as laid out in the *Act*.

### United Kingdom

- *Modern Slavery Act 2015*

Similar to Australia, the UK has mandatory reporting requirements for reporting entities. However, the disclosure format and structure is guided by only a recommended reporting criteria, as laid out in the *Act*.

To assist with aligning our multiple compliance obligations, **Table 1** reconciles the disclosures in this *Statement* to the relevant sections of the UK and Australian Modern Slavery Acts.

**Table 1.** UK and Australian reporting requirements reconciliation

| UK Modern Slavery Act Recommended Reporting Criteria   | Australian Modern Slavery Mandatory Reporting Criteria  | Addressed in this Statement                                    |   |
|--|---|--|---|
|  |   | Section  | Summary   |
| Organisation's structure, its business and its supply chains   | Identify each reporting entity covered by joint statement   | <i>About Thomas Foods</i>                                      | <ul style="list-style-type: none"> <li>✔ Joint Statement explanation</li> <li>✔ List of reporting entities</li> </ul>   |
|  | Describe the structure, operations and supply chains of each reporting entity covered in the joint statement  | <i>Our Structure, Operations and Supply Chain</i>              | <ul style="list-style-type: none"> <li>✔ Map of TFIC company locations</li> <li>✔ TFIC group operational structure</li> <li>✔ TFI Products &amp; services</li> <li>✔ TFI supply chains</li> </ul> |
| Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it as taken to assess and manage the risk. | Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls. | <i>Modern Slavery Risk in our Operations and Supply Chains</i> | <ul style="list-style-type: none"> <li>✔ Procurement risk matrix</li> <li>✔ Key factors determining risk</li> </ul>   |

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|  |  |   |  |
|--|--|---|--|
| Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains     | Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes. | <i>Actions Taken to Assess and Address Modern Slavery</i> | <input checked="" type="checkbox"/> TFI's "Statement of Intent"<br><input checked="" type="checkbox"/> TFI's objectives<br><input checked="" type="checkbox"/> Modern Slavery Framework<br><input checked="" type="checkbox"/> Forward Strategy<br><input checked="" type="checkbox"/> Due diligence & remediation |
| Training about slavery and Human trafficking available to the organisation's staff.  |  | <i>Actions Taken to Assess and Address Modern Slavery</i> | <input checked="" type="checkbox"/> Modern Slavery Framework<br><input checked="" type="checkbox"/> Forward Strategy   |
| Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it |  | <i>Consultation with Reporting Entities</i>               | <input checked="" type="checkbox"/> Management and Executive oversight   |

|                        |  |   |  |
|------------------------|--|---|--|
| considers appropriate. | Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities own or control. | <i>Consultation with Reporting Entities</i> | <input checked="" type="checkbox"/> Management and Executive oversight                     |
|                        | Any other relevant information.  | <i>Other Relevant Information</i>           | <input checked="" type="checkbox"/> Reported and detected incidents in the last 12 months. |

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

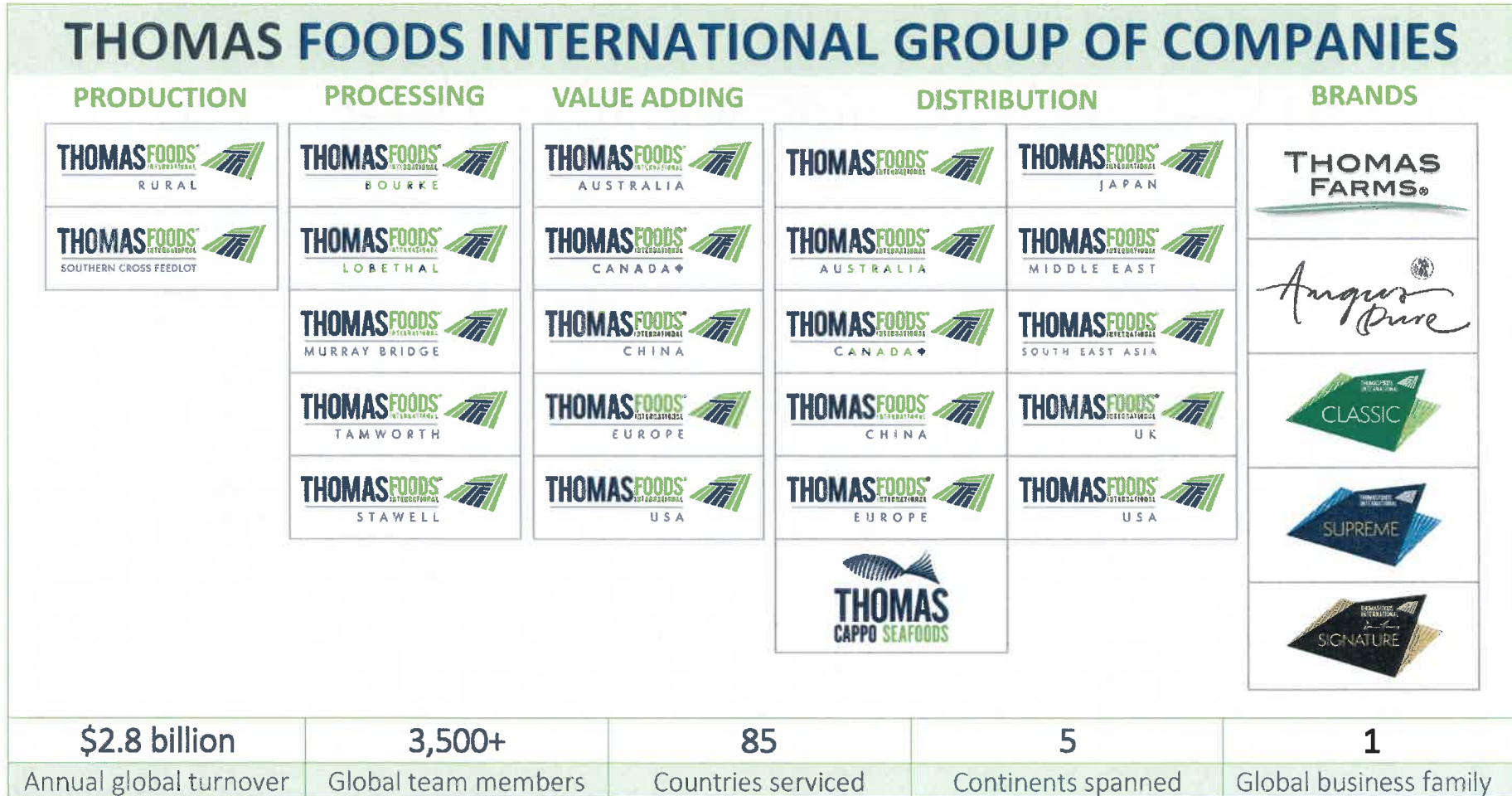
### OUR BUSINESS FAMILY AND OPERATIONS

TFIC is the parent entity of the TFI group of companies, with TFI's primary production and processing operations based in Australia. Our supply operations (i.e., secondary processing operations and sales and distribution operations) (Figure 2.) are located throughout Australia, and in the United States, Canada, China, Japan, Singapore, the Netherlands, Dubai, and the United Kingdom (Figure 1).

Figure 1. TFI group Australian and international locations



Figure 2. TFI group of companies' operational structure





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OUR PRODUCTS & SERVICES

The TFI group produces and sources premium meat and seafood products for local, national, and global markets. We also provide products, services, and logistics for boxed food delivery services. Our customer base includes food wholesalers, distributors, and retailers (major supermarket chains, butcher shops), restaurants, commercial caterers, hotels, pubs and clubs, aged care facilities, and e-commerce.



PREMIUM MEAT AND SEAFOOD

|                            |                   |                   |                    |
|----------------------------|-------------------|-------------------|--------------------|
| 270,000 TONNES             | 6,500+            | 3,800+            | 1                  |
| Premium products per annum | Customer accounts | Quality suppliers | Recipe for success |

OUR SUPPLY CHAINS

TFI procures a wide variety of goods and services in support of its business operations. Our inbound supply chain is made up of two key categories:

1. **Non-traded goods and services:** these comprise of goods and services which do not form part of our finished product portfolio, these can include uniforms and PPE, energy, contract services (labour), computer equipment, and cleaning and catering.
2. **Trade-related inputs:** comprise of livestock (cattle, sheep, lambs and goats), fresh and frozen seafood, pork, chicken and red meat products, packaging, spices and flavourings, haulage and logistics, chemical and fertilisers, seed, and packaging; which directly feed into our product portfolio.

Where possible, TFI prioritises Australian suppliers and partners, who share our commitment for socially responsible and sustainable products and services.

## MODERN SLAVERY RISK IN OUR OPERATIONS AND SUPPLY CHAINS

### MODERN SLAVERY RISK

In 2021 and 2022, the TFI group entities covered by this *Statement* participated in an internal modern slavery survey commissioned to baseline the group’s position with regard to modern slavery awareness, risk, and risk mitigation practices. As part of the survey, senior managers from each TFI business assessed the risk of modern slavery in their business operations and supply chains. From this process, TFIC concluded an overall modern slavery risk level of **LOW** within our operations.

In 2023 TFI undertook a further high level review of its supply chain with the objective of identifying specific key risks sectors that will be assessed at a more detailed level through Tier 1 and 2 supplier analysis (**Table 2**) in 2024. The risk level of each sector has been determined using the *Global Slavery Index 2023* and industry alignment and research.

**Table 2.** High level procurement risk matrix

| Possible Procurement Risk Sector | Scope   | Risk Considerations for 2024                      |
|----------------------------------|---|---|
| PPE & uniforms                   | PPE: Processing workers.<br><br>Uniforms: Operational and HO staff. | High risk sector, based on geographical sourcing. |

|   |   |   |
|---|---|---|
| Computer hardware                       | All TFI sites.  | Identified high risk area, particularly China.                                  |
| International fishing                   | Thomas Cippo (non-reporting entity, seafood supplier. Consolidated under TFI Consolidated.) | Significant in SE Asian fisheries (particularly Thailand, China and Indonesia.) |
| Transportation – international shipping | International sales.  | Identified high risk area.  |
| Cleaners                                | Specific TFI locations.   | Identified high risk area.  |
| Paper & pulp (Tier 2 & 3) - packaging   | TFI packaging sites.  | Identified high risk area outside Australia.                                    |
| Contracting - labour                    | Processing sites.   | Identified high risk area outside Australia.                                    |

### KEY FACTORS CONTRIBUTING TO TFI'S RISK LEVEL

Several key factors help identify, detect, and mitigate the risk of modern slavery in our operations and supply chains; enabling us to respect worker rights and entitlements, and provide fair and safe conditions of work:

- ✔ **Operational jurisdiction** – TFI's primary production and processing operations are in Australia, where we have long-standing partnerships with reputable primary producers.
- ✔ **Business expansion model** – As the TFI business family continues to grow and expand, we have recognised the importance and transparency of a vertically integrated value chain, and supply chain rationalisation and optimisation.
- ✔ **Governance and oversight** – TFI is a family-owned business with direct control over its primary production, processing, and supply operations. Our qualified Environment and Sustainability team regularly communicates and engages with both the Group Managing Director (Darren Thomas) and Group Chief Executive Officer (Anthony Stewart) to ensure close monitoring and active oversight of sustainability risks, including modern slavery, within TFI's operations and value chain. This enables management and the Board to retain an intimate knowledge of the business, provide vital leadership and direction, and ensure close oversight over the business.
- ✔ **Direct workforce management** – TFI continues to take greater control over its workforce. Through the establishment of our own recruitment entity, "TFI Employment Services", we are minimising the businesses' use of labour hire in Australia. We continue to review and evaluate opportunities to reduce the use of labour hire and recruitment agencies in other jurisdictions.

### ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY

The overall effectiveness of our **Modern Slavery Framework** and execution of our **Forward Strategy** will be reviewed and assessed to support the annual *Modern Slavery Statements* required under the relevant Modern Slavery Acts. Key considerations include:

- ✔ TFI's operational compliance to the Modern Slavery Acts, and the applicable TFI policies and practices.
- ✔ Supplier performance and compliance.
- ✔ Modern slavery risks, complaints and incidents, and remediation and mitigating actions to prevent modern slavery in our operations and supply chains.
- ✔ Non-conformity and areas for improvement.
- ✔ Board, Executive and staff training.
- ✔ Governance structures, formalised policies, and accountability levels.

In accordance with **Forward Strategy**, TFI will undertake several actions to improve the company's identification, monitoring, measurement and mitigation of modern slavery risks. This will include performance management and traceability of key suppliers. Supplier compliance will be monitored and assessed as part of our procurement and contract management process. However, monitoring and review mechanisms may vary depending upon contract type, significance, and risk. Mechanisms may include, but are not limited to supplier compliance reports, surveys, contractual reviews, and/or onsite audits.

## MODERN SLAVERY POLICY

### Statement of Intent

TFI is committed to ethical and socially responsible business practices and supply chains that respect and promote human rights and prevent the exploitation of workers, including situations of modern slavery.

TFI strives to prevent modern slavery and strictly prohibits situations where a person is exploited and cannot refuse or leave work because of threats, violence, coercion, abuse of power, or deception.

Modern slavery performance and risk is regularly reviewed by the TFI Environment and Sustainability team, and the Executive. High risks, gaps or issues of major concern are escalated to the TFI Board for review and to action accordingly.

### Objectives

The primary objectives of our Modern Slavery Policy are:

- ☒ To prevent, detect and mitigate the risk of modern slavery in TFI business operations and supply chains.
- ☒ To ensure TFI partners with suppliers who have a shared commitment to ethical and socially responsible business practices and the prevention of the exploitation of workers.
- ☒ To ensure TFI fulfils its annual reporting obligations under the *Modern Slavery Act 2018 (Cth)*, *Modern Slavery Act 2018 (NSW)*, *Modern Slavery Act 2015 (UK)*, and any other regulatory reporting requirements.

### Key Strategies

TFI has implemented the following key strategies to meet the commitments and objectives of our Modern Slavery Policy:

- ☒ TFI Executive and TFI Board accountability to prevent modern slavery and human rights abuses in TFI business operations, investments, partnerships, and supply chains; and ensure prompt and decisive management action to investigate and address breaches of the Policy.
- ☒ Divisional and business unit responsibility to identify, assess and control the risk of modern slavery across TFI business operations and supply chains.
- ☒ Legally compliant policies which prevent modern slavery and promote ethical and socially responsible business practices, including but not limited to recruitment, labour hire, on boarding, procurement, contract management and supply chain management.
- ☒ Regular monitoring, evaluation, and review of TFI business operations and supply chains to ensure compliance to the Policy and consistency of practices and controls.

## MODERN SLAVERY FRAMEWORK

TFI's Modern Slavery Framework comprises a comprehensive suite of policies and practices underpinned by our Code of Conduct and a collaborative, risk-based and continually improving management approach. TFI has a responsibility to identify modern slavery across the business and to introduce additional risk controls and initiatives to further refine and improve our performance.



### MODERN SLAVERY FRAMEWORK & FORWARD STRATEGY ACTIONS

| <u>POLICY</u> (Plan) ▶            | <u>PRACTICE</u> (Do) ▶           | <u>AUDIT</u> (Check) ▶                    | <u>REVIEW</u> (Act) ▶            |
|-----------------------------------|----------------------------------|---|----------------------------------|
| Code of Conduct                   | Recruitment Due Diligence        | Modern Slavery Self-Audit                 | Corrective & Preventative Action |
| Modern Slavery                    | Approved Supplier Program        | Supplier Checks & Audits                  | Operational Reviews & Reporting  |
| Ethical Sourcing                  | Enterprise Agreement             | Traceability Performance & Audit Register | TFI Executive Monitoring         |
| Purchasing                        | Industry Award Rates of Pay      | Annual Supplier Surveys                   | TFI Board Annual Review          |
| HR and WHS                        | Safe Work Conditions & Practices |   | Ongoing Legislative Review       |
| Anti-Bribery and Corruption       | Incident & Risk Reporting        |   |                                  |
| Conflict of Interest              | Modern Slavery Contract Clauses  |   |                                  |
| Disclosures                       | Tier 1 & 2 Supply Chain Mapping  |   |                                  |
| EEO & Anti-Discrimination         | Modern Slavery Training          |   |                                  |
| Workplace Grievances              | Sustainability Systems - testing |   |                                  |
| Whistle Blower and Grievance (MS) | Tier 3 Supply Chain Mapping      |   |                                  |

**Legend**

- Implemented
- Ongoing
- Forward Strategy

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### FORWARD STRATEGY

TFI is currently undertaking a value chain traceability project, including a focus on modern slavery. As part of our initial review, the following gaps were identified and will be addressed in 2024 and then going forward as part of our **Forward Strategy**.

#### 2024

- ☒ Continue to respond to actions arising from domestic and international legislative reviews and additions.
- ☒ Undertake a robust value chain assessment, prioritising Tier 1 and Tier 2 suppliers.
- ☒ Development and distribution of annual supplier surveys ready for 2024 reporting.
- ☒ Development of staff Modern Slavery Awareness training, in collaboration with HR teams.
- ☒ Review and test appropriate TFI sustainability systems to support TFI's value chain traceability, including modern slavery identification, monitoring and performance.
- ☒ Include modern slavery in the grievance and whistle-blowing policy (HR).

#### Following Years

##### Priority 1 Areas

- ☒ Creation of a performance and audit register for material and risk assessed suppliers.
- ☒ Continue deep dive supply chain assessment, obtaining full coverage and oversight of Tier 1 and Tier 2 suppliers.

- ☒ Roll out of TFI sustainability system, including capabilities for modern slavery risk assessments, supplier surveys, monitoring and performance management.
- ☒ Roll out of employee Modern Slavery Awareness training with HR.
- ☒ Develop corrective action request protocols, specific to modern slavery actions – integrated into supplier contracts and survey processes.
- ☒ Finalise *Approved Supplier Lists* for all TFI group entities.

##### Priority 2 Areas

- ☒ Begin audit schedule for any at-risk and material suppliers.
- ☒ Assign primary operational accountability for modern slavery to senior site managers through expanded, updated and defined job requirements and descriptions.
- ☒ Provide modern slavery information and assurance to customers upon request (sustainability system driven).
- ☒ Begin Tier 3 supplier analysis and risk assessment.

### DUE DILIGENCE AND REMEDIATION PROCESSES

#### Due Diligence

- ☒ TFI has a **comprehensive suite of Human Resources, Workforce Management and Work Health Safety policies and practices** to ensure we respect worker rights and entitlements, and provide fair and safe conditions of work.

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- ☒ TFI conducts **due diligence checks of prospective livestock suppliers** who participate in our Thomas Family Guarantee Program (TFG). In addition, suppliers are expected to comply with our *Ethical Sourcing Policy*.
- ☒ **All personnel** are provided the opportunity to **report modern slavery incidents and complaints**. They should also **have the confidence that all reported complaints** will be managed confidentially, investigated, escalated, and dealt with in accordance with our *Workplace Grievances Policy* or *Disclosures Policy* (for whistleblowers or confidential disclosures).

### Remediation

- ☒ **Corrective and preventive action** is taken to address any identified non-conformance, incidents or risks in our operations and supply chains.
- ☒ TFI works in **collaboration with our suppliers** to address any potential risks or areas of concern. **Remediation strategies** may include education and awareness, increased monitoring and reporting, visits to supplier premises and contractual reviews.
- ☒ Learnings are applied across the business and supply chains in line with our **quality management and continual improvement approach**.



## CONSULTATION WITH REPORTING ENTITIES

The TFI group of companies' is operationally managed and controlled by TFIC, with all reporting entities in this joint *Statement* falling under TFIC's executive and Board oversight. The structure allows for consistency in policy development and execution, which is then filtered down throughout the group from TFIC.

In previous years, as part of the TFIC's collaborative practices with reporting group members, senior representatives from TFI group entities completed a *Modern Slavery Self-Assessment Questionnaire* in consultation with the business. The questionnaire required TFI group entities to assess their level of awareness and understanding of modern slavery across their business and to confirm how they currently identify, assess, and address the risk of modern slavery in their entity operations and supply chains. Survey responses were collated and presented to the TFI Board along with the annual *Modern Slavery Statement*.

The Survey results informed our annual *Modern Slavery Statement* and our **Forward Strategy** to eliminate and mitigate the risk of modern slavery in our operations and supply chains. This survey will continue to be undertaken in future reporting years, in addition to detailed supplier surveys.

## OTHER RELEVANT INFORMATION

Modern slavery complaints received in past 12 months: **NIL**

Modern slavery incidents reported or detected in past 12 months: **NIL**