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# Warmoll Enterprise

## Modern Slavery Statement

For the period July 2022 – June 2023

This Modern Slavery Statement describes the steps taken by the Warmoll Enterprise and our associated entities during the Australian financial year ending June 2023 to address modern slavery risks in our business and supply chains. It is provided in compliance with our obligations under the Australian Modern Slavery Act 2018 and the UK's Modern Slavery Act 2015.

### 1. The Warmoll Enterprise includes multiple entities:

- Warmoll Group Pty Ltd – ACN 638 094 185
- Warmoll Farming Pty Ltd – ACN 638 116 917
- Warmoll Cattle Co Pty Ltd – ACN 638 116 917
- JF Warmoll & Co – ABN 74 581 299 212
- Warmoll Foods Pty Ltd (trading as Jack's Creek) – ACN 152 503 092
- Jack's Creek International Pty Ltd – ACN 634 301 830
- Jack's Creek Americas Inc – TFIN 84-2286075
- Jack's Creek UK Limited – CN 14214971
- Warmoll & Warmoll Pty Ltd – ACN 601 433 809
- Australian Certified Wagyu Beef Pty Ltd ("ACWB") – ACN 091 403 039
- Breeza Seeds Pty Ltd – ACN 127 306 003
- Warmoll Pty Ltd – ACN 001 401 109

For the purposes of this document, "Warmoll Enterprise" will encompass the broader group of entities listed in Section 1, unless otherwise indicated.

### 2. Our structure, operations and supply chains

The Warmoll Enterprise is wholly owned by members of the Warmoll family.

1. Warmoll Group Pty Ltd owns Warmoll Farming Pty Ltd and Warmoll Cattle Co Pty Ltd.
2. JF Warmoll & Co leases land, which is subleased to Warmoll Farming Pty Ltd.
3. Warmoll Farming Pty Ltd operates land and water assets to undertake broadacre farming, livestock breeding and backgrounding, and logistics for the farming operations.

4. Warmoll Cattle Co Pty Ltd owns cattle that are lot-fed under toll arrangements with various feedlots in NSW and Queensland.
5. Warmoll Foods Pty Ltd purchases cattle over-the-hooks from Warmoll Cattle Co Pty Ltd and other vendors. The cattle are toll processed at Australian Country Choice in Brisbane, Queensland, or Northern Co-operative Meat Company in Casino, NSW. Boxed beef is sold to domestic and international customers.
6. Jack's Creek International Pty Ltd is a holding company and owner of Jack's Creek Americas.
7. Jack's Creek Americas Inc. is a US-registered C-Corp, which purchases boxed beef directly from Warmoll Foods Pty Ltd for import and distribution in North America.
8. Jack's Creek UK is a UK-registered limited liability company, which purchases boxed beef directly from Warmoll Foods Pty Ltd for import and distribution in the UK.
9. Warmoll & Warmoll Pty Ltd conducts a small amount of third-party meat trading as required by some customers, backgrounds cattle, and sells small volumes of wholesale and retail beef.
10. ACWB is a toll lot feeding company
11. Breeza Seeds Pty Ltd is a seed cleaning and sales company
12. Warmoll Pty Ltd owns land

Warmoll Enterprise entities are for the most part based in and around Tamworth, NSW, but include offices in other locations including Melbourne, Victoria; Casino, NSW; Gold Coast, Queensland; Los Angeles, California; and London, England.

The companies together are an integrated soft commodity, cattle and beef business. Operations of these companies include:

- Mixed farming
- Grain trading
- Beef cattle breeding
- Beef cattle backgrounding
- Beef cattle lot feeding
- Beef cattle trading
- Beef processing, marketing and distribution

Warmoll Farming Pty Ltd employs most staff directly, with a small number of international staff recruited through third parties. Warmoll Farming employed 44 staff at various times throughout the year, including members of the Warmoll family, and including four foreign employees.

Warmoll Foods Pty Ltd is the main employer of staff within the Warmoll Enterprise. All staff are employed directly by Warmoll Foods – no intermediary. During the 2022-23 financial year, Warmoll Foods Pty Ltd employed 53 people, Jack's Creek Americas Inc employed 4 people, and Jack's Creek UK employed 2 people.

Based on our understanding of the definition of modern slavery, we are confident that we have had no instances that would be deemed to be modern slavery, or anything resembling such. We will develop a formal assessment of our processes in place for employment of this nature to ensure that these employees are not at risk of being subject to any form of modern slavery.

Our largest creditors, which are and will be the initial key focus for us with regard to modern slavery risks, are abattoirs, cattle vendors, shipping lines and shipping agents, and livestock feed suppliers.

### **3. Modern slavery risks within our operations and supply chains**

The Warmoll Enterprise is confident that within the companies under its direct control, as listed in Section 1, there are no instances in which any person is subject to modern slavery.

Our relatively small number of staff, and the close working relationship between the owners/directors of our companies and our employees, gives our key decision-makers direct line of sight as to our compliance with internal policies, including: Modern Slavery; Anti-Discrimination and Equal Opportunity; Discrimination and Harassment; Employee Privacy; Grievance Resolution; Work Health and Safety; and Workplace Bullying.

Based on our understanding of the industries that are among those most at-risk of modern slavery in Australia, our supply chain directly relating to livestock procurement, feeding and processing is the area that is likely to require the greatest care or scrutiny in ensuring we are able to meet our objectives in contributing to the eradication of modern slavery. This in no way implies we suspect that this is the case with any of our suppliers, but simply relates to the common use of seasonal or temporary labour in agriculture, and foreign, temporary or unskilled labour in meat processing.

#### **4. Actions to assess and address modern slavery risks**

Our Modern Slavery Policy affirms our commitment to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery within our operations and supply chains.

We did not complete the development of a training module for our staff in relation to modern slavery in the 2023 financial year, as we had intended, however it has been identified by our Board as a focus area to ensure we do not inadvertently breach any modern slavery risks in future.

Our Whistleblower Policy is separate to, but supports, our Modern Slavery Policy. This identifies the paths a staff member can follow in the event they feel reporting is necessary as a result of a certain event or events.

We have completed a Supplier Code of Conduct that will be distributed to all suppliers, with an expectation of a response and acceptance within a month of distribution to the supplier. It is intended that any supplier that does not accept this code of conduct will cease to become a supplier after the acceptance date, and no new supplier will be taken on without accepting the Code of Conduct. This may come under review based on feedback from suppliers.

Our formal identification of all creditors/suppliers will allow us to group all of these entities by sector and grade by level of risk.

Warmoll Foods has joined Sedex Consulting, a global member-based organisation that collates data regarding modern slavery risks and will assist us in more accurately determining where our risks lie. We completed our Self Assessment Questionnaire in the 2023 financial year, and have linked with Australian Country Choice and the Northern Co-Operative Meat Company (our two abattoir partners) – giving us much clearer visibility into their staff management practices. Over time, we will continue to work with other suppliers and encourage them to use this platform. This will give more visibility to us, as well as potentially any other customers of our suppliers, helping to broaden the knowledge of modern slavery risks across our industry.

#### **5. Assessing the effectiveness of actions taken so far**

As noted above, we are confident that all entities within our direct control are compliant with regard to modern slavery requirements.

Similarly, those major suppliers we work with on a regular basis, and accounting for the majority of our expenditure, are reputable companies with oversight from various government agencies and independent

auditing bodies, including the Commonwealth Department of Agriculture, Fisheries and Forestry (DAFF), and AUS-MEAT.

A small number of customers have noted their requirements in relation to their own compliance with the Modern Slavery Act, and we expect that this will increase over time. To date, no customers have expressed any concerns relating to our performance in this area. We expect there will be more detailed questions to follow in future as awareness grows in relation to Modern Slavery. We are confident that our current position is strong, and customers will not have further concerns, however we are willing to undertake discussions with customers should they raise any concerns about us or our supply chain.

We have undertaken a review of Modern Slavery Statements submitted by other companies in our industry, and note similar positions and actions either undertaken or planned to be undertaken. We do not intend to be “led” by what others may or may not be doing, however it is comforting to see that we are not behind others in our industry.

## **6. Consultation with entities the reporting entity owns or controls**

The entities described in Section 1 of this document have common owners and directors, with policies applicable to one entity applicable across the Warmoll Enterprise.

These Directors, who have oversight of each entity listed in Section 1, have approved all internal Policies, and have overarching responsibility for the implementation of each policy.

Policies relevant to Modern Slavery include:

- Modern Slavery
- Whistleblower
- WHS (and associated Incident Form)
- Disputes, Grievances and Misconduct
- Employee Privacy
- Equal Opportunity, Anti-Discrimination; and Bullying and Harassment

These policies detail the expectations we have for all individuals employed across the various entities to ensure that any activities and behaviour do not escalate to a point whereby there might be a risk of modern slavery occurring, staff operate in an unsafe workplace, or staff feel uncomfortable working with co-workers or supervisors. The policies relating to whistleblowing and grievances also provide a process for individuals to confidentially report to and consult with supervisors and managers with any concerns they might have in these areas.

## **7. Training**

It is important to us that our employees are aware of the issues surrounding modern slavery and support our values. To that end we intend to implement training for all staff within the Warmoll Enterprise on modern slavery to reinforce our policies and the steps to be taken in the event of any concerns.

## **8. Other relevant information**

Next steps to minimise the risk of modern slavery in our supply chains.

- Full distribution of Supplier Code of Conduct

- Will include maintenance of a register of suppliers that have completed the form and those that require following up.
- Undertaking an assessment of our suppliers, initially utilising the Sedex risk matrix module, and then with direct engagement with most “at-risk” suppliers and those with more complex supply chains of their own, in order to better understand the broader risks of modern slavery that may exist deeper in our supply chain.
- Roll-out of Modern Slavery training module for all staff within the Warmoll Enterprise
- Formal register with HR to ensure all staff are aware of their obligations (acknowledgement and understanding of the Modern Slavery Policy and, when implemented, the training program).

This Modern Slavery Statement has been endorsed and approved by the Board of Directors of Warmoll Group Pty Ltd on 5 December 2023.



Patrick Warmoll  
Managing Director  
Warmoll Foods Pty Ltd

5 December 2023