

Modern slavery statement 2023-24 financial year



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1 Introduction

This Modern Slavery Statement reports against the previous commitments made to address modern slavery risks outlined in the Statement submitted by Baiada Pty Limited in 2022-2023 in accordance with the *Modern Slavery Act 2018* (Cth) (the "Act").

This is again a joint statement that has been prepared by, and made on behalf of, Baiada and its wholly owned entities and covers the period of 1 July 2023 to 30 June 2024.

Baiada remains committed to upholding fundamental human rights for all, and in particular, identifying and managing modern slavery risks at all stages of its business activities.



2 The Baiada Business

The Baiada Group is a multi-faceted business that spans multiple industries.

2.1 Baiada Poultry

Baiada Poultry is one of the largest poultry processors in Australia. Baiada has been a family-owned business since it was founded in 1946, operating as a fully vertically integrated business, owning and operating farms, hatcheries, feed mills, processing and rendering plants and producing chicken and turkey meat products, some of which are sold under the Steggles or Lilydale brands. Baiada directly employs the majority of its 7,712 workers undertaking these operations, which workers including indirect agency workers (25.2%). Baiada also engages specialist contractors and those contractor employees comprise 7.8%. Efforts continue to transfer the qualifying pool of casual agency staff to direct employees over this reporting period to provide assurance of employment and take direct control of their wages and therefore pay compliance.

2.2 Celestino

A property development business in New South Wales and Queensland that develops residential, commercial, industrial and mixed-use developments. Celestino now has 12 full time employees.

2.3 Greens & Goodness

Greens & Goodness is a plant-based protein products business. Greens & Goodness is supported by the Baiada Poultry workforce, and a second 4-Pillar SMETA audit was conducted in September 2023 on the production facility that manufactures these products. A decision was made in the later part of the reporting period to cease this business.

2.4 Birling Laboratories

Birling Laboratories is a fully independent laboratory accredited to the highest standards by the National Association of Testing Authorities Australia (NATA). Birling provides laboratory services to the poultry industry including microbiology, quality assurance, serology, virology, molecular biology, allergen testing and pathology. Birling also has a research and development program, including conducting collaborative research with private, government and university researchers, such as the University of Sydney, the University of NSW, the University of Melbourne and the Elizabeth Macarthur Agricultural Institute. Birling Laboratories currently has 33 employees.



3 The Baiada Group's Supply Chain

The Baiada Group's supply chain has remained essentially the same as described in previous Statements. Our core suppliers largely remain unchanged. The major suppliers to the Celestino business are professional services consultants (engineers, lawyers, environmental scientists, etc) and as such the risk of modern slavery is presently considered to be low. This will be reassessed as Celestino's supply chain changes and expands to include construction work.

As has been the case previously, the majority of the Baiada 5,000 plus direct suppliers and contractors are based in Australia, and the focus remains on using locally-based businesses to stimulate the local economy, particularly in the regional areas. This also has benefits in the modern slavery space with local suppliers having less opportunity to exploit vulnerable people for profit.

4 Risks of Modern Slavery Practices

The Baiada Group has a complex network of suppliers of goods and services, and the increased focus has continued on ensuring compliance in all areas, including modern slavery. Our supply chain remains diverse, from family-owned grower farms to major multinational companies.

Due to the nature of the supply chains and networks, our modern slavery risks remain largely unchanged from our previous Statements. Specifically, the following indicators and risks of modern slavery practices have the potential to exist:

- use of forced labour and bonded labour by suppliers;
- use of child labour by suppliers from certain countries of origin;
- exploitation of migrant workers which can include underpayment of wages;
- location and source of the goods and services;
- types of goods and services being supplied; and
- number of tiers in the supply chain.

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5 Assessing and Addressing Risks of Modern Slavery Practices

The Baiada Group continues to prioritise and strengthen its approach to the mitigation of modern slavery risks across the business including within its supply chain and workforce. The Baiada Group is committed to further developing its people and strategies to ensure the business understands the risks, we employ a people-centric approach from the top and continue to build trust and a 'speak up' culture where those who are vulnerable or need help feel comfortable to reach out and gain the support they need.

The Baiada Group has continued to implement a series of actions, including continued assessments of our own internal workforce to ensure all areas of potential risk are included.

External vendors that pose higher risk to Baiada (in all areas of compliance) continue to be engaged under formal written terms and conditions. Baiada's template terms and conditions are updated from time to time in response to evolving circumstances and changes in law. Proposed vendors engaged at a national level for the poultry business are also required to complete questionnaires which include information regarding how they identify and manage modern slavery risk. These responses are assessed accordingly and further queries posed, where warranted.

As mentioned in our previous Statements, where additional risk is identified, third party audits such as SMETA will be conducted on suppliers/vendors. Baiada has continued to assess and address risks of modern slavery by taking an enhanced focus on supplier engagement and working with a supplier to mitigate such risks. Actions taken during this and proposed actions for the next reporting years is further detailed in this Statement.

5.1 Managing Suppliers

- As part of Baiada's enterprise risk management framework, modern slavery risk is
 regularly monitored by the Baiada Advisory Board and the Board's Risk Subcommittee,
 as well as the Celestino Advisory Board and that Board's Risk Subcommittee. This risk is
 reviewed and updated on a regular basis, with the last update in the reporting period
 having occurred in April 2024.
- Celestino's supply chain remains relatively unchanged from the previous Statement. During this reporting period, Celestino issued one material construction project for tender and the bidders for that work were required to provide details of the reasonable steps they take to identify, assess and address modern slavery risks within their operations and supply chain, as well as providing assurance of compliance to the Act. Otherwise, there was no substantive active construction and no procurement of construction or building materials. As the modern slavery risk will evolve over time as the business changes in line with the expected growth of construction projects, Celestino has engaged an external consultant to develop an ESG framework, which will include a modern slavery policy and procedure.
- With respect to the poultry business a Third-Party Supply Chain Working Group monitors all aspects of supply chain risk including modern slavery, and aims to meet on a quarterly basis. During this reporting period, the ownership and management of this working group was re-tasked to the procurement team due to their visibility of the supply chain. Additionally, the working group was extended to include management from all key business areas, including livestock, operations, distribution, commercial, finance, risk and people. The meetings are designed to ensure business continuity through minimising interruptions, but also continue to raise overall modern slavery awareness with senior management.

- Substantive supplier legal agreements continue to be signed with key suppliers, the terms of which are commensurate with the risk posed to the Baiada Group, with the express expectation and requirement to comply with legislation. Additionally, the Baiada Group has audit rights under its contracts to determine supplier compliance by inspecting books and records.
- 61 major vendors are now partnered with Baiada on Sedex including key suppliers of packaging, ingredients and PPE as of 30 June 2024. Baiada continues to drive the importance of Sedex partnerships with vendors and highlighting the importance of transparency across our supply chains which will remain a priority for the procurement and risk teams who continue to look at new, innovative ways to further assess supplier slavery risks to strengthen our controls and due diligence.
- The poultry business' expectation of suppliers and non-tolerance for any human rights violations continues to be communicated in a 'Supplier Code of Conduct'. This Code includes commitments to compliance with workplace laws, combatting modern slavery in direct and up-stream suppliers and the prohibition of child and illegal labour. The Code was rolled out in 2021 to the top 20% of suppliers to the poultry business. To date, this has captured approximately 700 of Baiada's suppliers. Suppliers are required to declare that they not only commit to the principles within the Code, but also acknowledge Baiada's commitment to ethical, legal and socially responsible business practices. Baiada relies on these statements for a variety of uses, including assisting to determine compliance with modern slavery laws, its submission of this annual Statement and deciding as to whether to enter into new or retain existing commercial relationships with the supplier. Since 2022, all new national suppliers are required to complete the Code as part of the onboarding process, and a review of current suppliers that have not completed the Code continues. Baiada has over 5,000 suppliers and plans to introduce a supplier portal to improve efficiency and consistency, as the current onboarding process is manual and requires significant resources to administer.
- Baiada has continued its membership of Sedex as an "AB" supplier category for the poultry business. As part of its membership with Sedex, the poultry business continues to ensure its commitment is met to update the Self-Assessment Questionnaire ("SAQ") for its 14 major operating sites on at least an annual basis. The SAQ and audits continue to meet the 4-Pillar SMETA assessment criteria. During this reporting period, all site SAQs were updated and site resources trained to be able to update their SAQs at a site level increasing local knowledge and accountability. As outlined above, 61 suppliers are now partnered with Baiada on Sedex further improving visibility of Baiada's supply chain to its customers and supplier compliance with the Ethical Trading Initiative Code. The business will continue to drive increased supplier partnerships on Sedex. Once SMETA audits are completed and site SAQs published, these are made available to those suppliers and customers partnered with Baiada on the Sedex platform.
- Sedex has continued to function as a useful tool for assessing supply chain risk along with BSI SCREEN, providing up-to-date reporting and analysis of supply chain risk worldwide. In this reporting period, there was a notable increase in reports by BSI SCREEN regarding child labour used in USA in manufacturing industries. All US suppliers were reviewed and were deemed low risk. An additional four managers across procurement, HR and risk departments were added as subscribers to the program and provided with in depth training.

- The Baiada Group's Stopline operates under the Whistleblower Policy, and is a confidential hotline service run by an independent third party that all stakeholders can use to raise concerns or complaints in an anonymous manner, if preferred. It is accessible by phone, fax, email, post, Baiada website and via the Stopline app and is widely advertised at sites. Posters promoting the Stopline service were redesigned and refreshed across all sites during this reporting period. The new design includes a QR code for ease of reporting by staff and contractors and has been made available in multiple languages. The Whistleblower Policy was also reviewed and re-issued in April 2024. Baiada is committed to investigating every whistleblower report thoroughly.
- A modern slavery risk assessment was conducted in November 2023 on national vendors deemed to be at the highest potential risk. Of the vendors assessed, three suppliers located in the Asian region produced a 'high-risk' result in the risk assessment. The procurement team engaged with these suppliers addressing concerns in order to gain information and evidence supporting that any concerns had been addressed in order to improve these risk ratings and therefore providing confidence to the business to continue these supply relationships. Following this process, one supplier achieved a reduced risk rating and supply continues. The highrisk products purchased from the other two suppliers have substantially reduced with a view to sourcing alternate supply in the near future.
- Any instances of suspected supplier non-compliance with modern slavery principles will trigger a thorough and fair investigation followed by analysis of the findings and risk-based outcomes. Any instances are reported including any SMETA or other social workplace accountability audit non-conformances.
- No reports of modern slavery incidents were identified or reported in this reporting period. Baiada's Modern Slavery Incident Log continues to keep a record of any such matters including resolution steps. In this manner, incidents can be tracked and trends identified and easily reported. In November 2023 the business was contacted by local media in Tamworth reporting migrant meat and food workers living in large share housing subject to poor living conditions. Following the information being received and further television coverage of the allegations, Baiada investigated an address of interest which resulted in no findings relating to modern slavery practices.
- In this reporting period, the Baiada Group engaged with all deboning, security and cleaning contractors nationally requesting that they become partners with Baiada in Sedex by 30 June 2024 and conduct 2 Pillar SMETA audits using an audit provider of their choice. The SMETA 2 Pillar audit focuses primarily on labour standards, health and safety with reviews completed on management systems, subcontracting, ethics and environment (limited assessment). The audit also includes a sample review of payroll in addition to group and confidential, individual employee interviews. These contractors / suppliers were assessed as 'higher risk' due to the nature of work undertaken, the fact that the majority of their workers are migrants and these workers attend Baiada sites on a regular basis.
- The Third-Party Supply Chain Working Group will continue risk assessing other key suppliers within the supply chain. During the next reporting period, it is envisaged that additional suppliers identified in the risk assessment process will be invited to participate in the SMETA 2 Pillar audit program in order to provide further confidence and tangible evidence that these suppliers are aligned with our business values and hold and demonstrate high standards with respect to labour, safety, ethics and sustainability.

 A Modern Slavery Standard continues to be maintained, outlining the Baiada system for identifying and managing this risk. In this reporting period, Baiada continued to engage an external expert to develop updated workplace training. In the next reporting period, Baiada intends to continue this development and roll out modern slavery training tailored to the management team as well as additional training designed for our front-line employees. This approach to training supports our drive for a more people-centric approach aiming to provide managers with the tools and confidence to identify, address and manage modern slavery risks effectively and empower employees to seek support and encourage a 'speak up' culture. An education campaign will also be rolled out across all sites highlighting modern slavery risks and details on how employees can report and or seek support.

5.2 Ethical Procurement

- Consumables are mainly procured from Asia. China remains a Tier 2 supplier via Australian-based businesses. Manufacturing equipment is generally sourced from western European countries. Argentina remains the main source of soybean procurement.
- Baiada's largest soybean supplier has confirmed that they are members of the Round Table on Responsible Sourcing of Soy (RTRS), which provides risk controls and assurances in this area. This supplier has a comprehensive commitment on its website and also furnishes an annual Modern Slavery Statement. Baiada has also written and issued a 'Soy Sourcing Policy Statement' in April 2022, commensurate with its expectations on responsible and ethical sourcing. In this reporting period, an additional commitment was received from this supplier further committing to supply 100% sustainable soy bean meal which is sourced from regions that are not undergoing deforestation.
- In addition to the risk assessment completed on suppliers from high risk locations and changes made as a result to the sourcing and supply of PPE and cleaning chemical ingredients, Baiada's turkey farming division changed sourcing of egg carton fillers from China to an alternate supplier from New Zealand and are currently investigating alternate supply of semen extenders from Germany.
- The major manufacturing sites in the poultry business continue to operate under their Ethical Sourcing Policy. Whilst Baiada considered consolidating all policies into a single group wide policy, it has decided to retain site based Ethical Sourcing Policies at this stage, to ensure consistency with all ESG initiatives.
- In January 2024, Baiada employed a Group Sustainability and ESG Manager with
 previous poultry industry experience. This engagement has allowed for greater focus
 and further development of Baiada's ESG framework and strategy. Modern slavery
 forms part of the 'ethical business practices' priority stream within the ESG framework
 and the relevant ESG working group has oversight over the Modern Slavery Standard
 and proactive initiatives in place and planned. The group includes senior staff with
 expertise in procurement, law and ethics, risk and compliance. As previously noted,
 Celestino expect to develop of their ESG framework in the next reporting period.
- The Baiada 'Social Accountability Program' document which outlines Baiada's
 position on ethical conduct and expectations (including labour practices) has been
 communicated across the major manufacturing operations including feed mills and
 livestock. The document is also available for employees to view on Baiada's intranet
 and within the employee payroll portal.

- The development and implementation of an Employee Code of Conduct is planned. Further development and engagement with a specialist third party will be sought in FY24-25 to ensure the most effective and practical document is created and implemented for our employees' reference and understanding. Baiada aims to make this document available in various languages. Training continues at major operational sites in their Ethical Sourcing Policy and Baiada's Social Accountability Program.
- As noted in prior Statements, the business has engaged with a specialist legal firm specialising in modern slavery and training development for the workplace. Senior management from the procurement, HR and risk teams were enrolled to participate in a Modern Slavery Training Workshop facilitated by an external provider in July 2024. In line with the goal of greater awareness and development of its people, senior management in key roles will continue participating in applicable Modern Slavery webinars and training sessions.

5.3 Managing Risks within the Baiada Workforce

- The controls within the Baiada Group to ensure appropriate legal status exists in
 relation to employment rights have continued, including use of the VEVO system for
 employees, agency staff and contractors. Any immigration anomalies are reported
 and immediately rectified with preventative actions. Additionally, the Baiada Group
 developed a suite of written procedures for staff who are required to use the VEVO /
 vSure system, with training provided to relevant employees. The current process and
 procedures were reviewed in this reporting period and the HR team administering
 the system, retrained. All team members using the online vSure system were also
 retrained in using the system effectively and will be provided refresher training as
 necessary. In addition, the Baiada Group is developing a program where visa types are
 risk assessed and assigned appropriate risk mitigation measures.
- The indirect labour pool includes two nationally registered (and licenced in states where this is a requirement) labour hire companies, which currently consists of 25.2% of Baiada's total workforce.
- The Baiada Group continues to provide payroll services to boning contractors to ensure correct amounts are paid to their staff, and to minimise the risk of wage underpayment.
- In FY 2023-24, eleven Baiada sites completed SMETA 4 Pillar Audits, the majority of findings related to WHS and training and all findings have been addressed with corrective actions reviewed and accepted by respective auditors.
- Annual payroll audits continue to occur on the two labour agencies used by Baiada, conducted by the Baiada Payroll Manager. One minor, non-systemic issue was detected and rectified.
- External third-party payroll audits continued this year on the Baiada workforce in November – December 2023 and a further audit carried out in December 2023 -January 2024 on the payroll for select contractors used within the poultry business. No major findings were discovered in either audit. These external audits are set to continue in FY 24-25.
- Each poultry operating site's workforce continues to operate under its own Enterprise Agreement (EA), which includes a dispute resolution process that is available for any worker covered by the EA to use.

- The fourth quarter of FY23-24 has seen the re-development and introduction of a new dashboard and reporting methodology for capturing grievance data allowing greater accuracy, site coverage and deeper insights allowing for more informed decision making and visibility by the management team.
- In line with Baiada's people development goals, training programs for site management teams continued through FY 2023-24 with training covering equitable recruitment, wage theft, payroll legislation, Fair Work Act and other industrial relations matters.
- A new payroll compliance initiative has been developed to drive continual improvement of Baiada's payroll systems.
- Baiada continued their six-monthly review of boning contractor employee residential addresses which involves reviewing any address where greater than five employees reside to understand if the size and amenities of the property are suitable for the amount of people living at the property. In cases where there may be concerns, a further investigation is initiated. In addition, Baiada continues to conduct interviews with a sample of the boning contractor employees at applicable sites with questions focusing on working conditions and wages. These interviews are conducted with translators as required.
- Building relationships and meaningful collaborations with key organisations and supply partners has been a key focus for Baiada in this reporting period including engaging with the NSW Office of the Anti-Slavery Commissioner and major retail partners to share business insights, experiences, initiatives to address modern slavery risks in the workforce and supply chain with the aim of reducing these risks, raising awareness and continually improving our approach to reduce modern slavery practices and support those most vulnerable. In September 2023, a group of Baiada senior managers including the Managing Director met with NSW Anti-Slavery Commissioner James Cockayne and members of his team to provide insight into Baiada's workforce in the Griffith region to further support their research into the risk of modern slavery in regional NSW and their strategy development. In the first half of 2024, senior management from various key business areas such as HR, procurement, risk and sales met with the ethical sourcing teams of major retail partners to share details on Baiada's supply chain and workforce as well as initiatives the business has adopted to address modern slavery risks within the supply chain and workforce. These engagements were positive with valuable insights shared allowing the opportunity to strengthen current risk controls for all businesses involved, build key relationships and provide further opportunities to collaborate in the future.

5.4 Our Policies and Procedures

The Baiada Group has the following governance policies and procedures in place to manage risks within its workforce and its supply chain, in order to promote health and safety, establish a compliance framework, and to prevent modern slavery:

- Inappropriate Workplace Behaviour Policy
- Grievance Policy
- Whistleblower Policy
- Privacy Policy
- Supplier Code of Conduct
- Soy Sourcing Policy Statement
- Ethical Sourcing Policy
- Social Accountability Program



6 Continuing Actions and Commitments for 2024-2025

6.1 The Baiada Workforce

- Following Baiada's work on the development of an Employee Code of Conduct for all poultry workers in the last reporting period, Baiada will work with an external provider that specialises in the development and effective implementation of employee relations documentation to assist with this project.
- Workplace training, including training covering new provisions of the Fair Work Act 2009 (Cth) will continue to be implemented to ensure senior and site management staff are equipped with the knowledge and confidence to assess risks and manage situations in the workplace effectively. Baiada aims to develop and deliver a Respect@ Work training package for management and front-line employees as an extension to previous inappropriate workplace behaviour training. The training aims to ensure a clear understanding of what the most recent legislation changes means with respect to sexual harassment and psychosocial hazards in the workplace, business / employer responsibilities and their role and responsibilities as managers. A poster campaign will also be rolled out across all sites providing details on how employees can report and or seek support.
- Diversity and equity training and training for the development of middle management will also be prioritised in line with Baiada's continued focus on building a culture where everyone feels safe and respected in the workplace.
- Baiada will focus on developing management awareness and education in modern slavery and the empowerment of employees to be able to report modern slavery and other forms of labour exploitation with targeted training and communications. Updated modern slavery training will be developed and implemented for the management team for front-line employees with the aim of providing managers with the tools and confidence to identify, address and manage modern slavery risks effectively and empower employees to seek support and encourage a 'speak up' culture. An education campaign will also be rolled out across all sites highlighting modern slavery risks and details on how employees can report and or seek support.

- A review and risk assessment of all visa types will be completed with additional risk controls developed followed by the development of an Immigration Policy.
- National implementation of a new cloud-based payroll system providing improved payroll compliance and data security.
- Six monthly reviews of employee residential addresses will be expanded to include all Baiada payroll and external agency employees as well as the review and increased coverage of internal interviews conducted with employees regarded as most vulnerable.
- The development of modern slavery KPIs which tracks data obtained from an incident log (which records the number of such incidents or high-risk products identified in the reporting period), the number of audits and findings, amount of training conducted, supplier performance analysis and the percentage of survey responses.

6.2 Suppliers

It is recognised that the key to assessing at-risk suppliers is to communicate and proactively work with them to understand the risks of modern slavery in their business practices.

The Baiada Group continues to ensure that suppliers identified as having possible modern slavery risks have processes in place for managing these and are open to working with Baiada, as is appropriate. Where concerns are identified about supplier performance, Baiada will engage with the supplier seeking constructive dialogue and remediation of noncompliance in accordance with the Baiada Group's standards.

Where suppliers are unable to demonstrate that they have appropriate risk management controls in place, or are unwilling to share this information, the Baiada Group may take further action, such as engaging supplier contract management, implementing a remediation plan or ultimately suspending their services/supply. Such actions will be taken against priority risk areas identified that would cause the greatest harm to people.

Commitments for the 2024-25 Reporting Period

- Baiada's Modern Slavery Standard will be reviewed and updated as required. Baiada will continue to undertake training on the Modern Slavery Standard and the procurement team will continue to participate in supply chain modern slavery risk training as appropriate. Training continues at major operational sites in their Ethical Sourcing Policy and Baiada's Social Accountability Program.
- Baiada will continue to seek out the opportunity to build more trust-based and collaborative relations with business partners, employee organisations and Government bodies to share knowledge and develop further risk control mechanisms for vulnerable employees and supply chains.
- Increased participation by suppliers and contractors deemed higher risk in Baiada's 2-Pillar SMETA audit program.
- The Supplier Code of Conduct and Supplier Onboarding Questionnaires covering ethical sourcing will continue to be provided to new suppliers for completion and review prior to onboarding. Depending on these responses, the supplier may be subject to third party audit and/or be subject to shorter term contracts that are subject to more regular review and renewal. The procurement team will review current suppliers that have not yet received the Supplier Code of Conduct and confirm a list of suppliers that will be issued the code to review and accept.

- Baiada will continue to assess supply partners that pose a higher risk of modern slavery in their supply chains. Outcomes of the assessment will be reported in the next reporting period.
- Baiada will review its procurement resources including the commencement of a project to introduce a supplier portal to improve efficiency and reduce administrative resource requirements, automate document collection and the supplier risk assessment process.
- The Celestino business is focussed on planning and delivering sustainable communities and as will commence work on the development of their ESG framework, which will include a 'fit for purpose' modern slavery policy and procedure outlining actions the business will take to identify and address the risk of modern slavery including tracking and reporting procedures, supplier / contractor requirements and risk assessment framework.

7 Assessing Effectiveness of Baiada's Actions

Baiada continues to work to educate its management team and employees to better identify and address modern slavery risks affecting its workforce and supply chain. The information reported is used to monitor the effectiveness and performance of modern slavery risk controls and initiatives in the following ways:

- Tracking the results of our ethical audits across time periods and between sites, via an internal Corrective Action Request Log and ensure that timely preventative and corrective actions are applied to all findings;
- Tracking the extent to which the workforce and suppliers have encountered modern slavery issues. This is being monitored and managed through the use of an Incident Log maintained by the People & Risk Management team;
- Number and nature of issues raised via the Stopline and other grievance mechanisms which is reported quarterly to the highest level of governance in the business;
- Extent to which training in modern slavery and other ethical issues have been communicated to staff;
- Feedback received from business partners including customers regarding Baiada's approach to modern slavery risk management;
- Percentage of contracts issued that require compliance to laws related to modern slavery practices (which in this reporting period, all substantive Baiada-issued template contracts with suppliers of goods & services contain reference to the Supplier Code of Conduct which includes modern slavery compliance requirements).

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8 Consultation Process

This statement has been prepared in consultation with each reporting entity, assisting to facilitate the identification, assessment and remediation of modern slavery risks.

The majority of senior management is located at the Baiada Group's Head Office who have actively engaged in the consultation process through management meetings.

9 Conclusion

The ongoing commitment of the Baiada Group is to further investigate its supply chain to identify modern slavery risks and to take appropriate actions to mitigate those risks. This statement reflects that commitment.

10 Declaration

Prior to lodgement of this statement, this statement was prepared and provided to the Risk Subcommittee and ultimately to the Advisory Board for endorsement and feedback, where adjustments have been made accordingly.

This statement has been reviewed by the Baiada Board of Directors in December 2024 and is signed by a member of the Board on behalf of all reporting entities.

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George Tsekouras Director: Baiada Pty Limited Date: TUE 17.12.24

