

# Gundagai Meat Processors | Modern Slavery Statement | FY25

Reporting period: 1 July 2024 – 30 June 2025

## CONTENTS

1.	ABOUT THIS STATEMENT .....	2
2.	ABOUT GUNDAGAI MEAT PROCESSORS .....	2
3.	OUR OPERATIONS AND SUPPLY CHAINS .....	3
4.	MODERN SLAVERY RISKS.....	4
5.	GOVERNANCE AND MANAGEMENT SYSTEM .....	6
6.	ACTIONS TO ASSESS AND ADDRESS RISKS .....	7
7.	ASSESSING THE EFFECTIVENESS OF OUR ACTIONS .....	9
8.	CONSULTATION .....	10
9.	LOOKING AHEAD .....	10
10.	APPROVAL.....	10

## 1. ABOUT THIS STATEMENT

This Modern Slavery Statement (the Statement) sets out the actions taken by Gundagai Meat Processors to identify, assess and address modern slavery risks in our operations and supply chains during the reporting period.

### 1.1. Reporting entity

This Statement is made by Hirino Pty Ltd (ACN 001 574 803) as trustee for the Barton Unit Trust, trading as Gundagai Meat Processors (ABN 45 790 285 885) (GMP, we, our, the Company). The Statement covers GMP only; it is not a joint statement and no other entities are owned or controlled by the reporting entity for the purposes of this Statement.

### 1.2. Reporting period

This Statement covers the financial year 1 July 2024 to 30 June 2025 (FY25).

### 1.3. Nature of this Statement

GMP is a reporting entity under Section 5 of the Modern Slavery Act 2018 (Cth). The Company's consolidated annual revenue for the reporting period exceeded the AUD \$100 million threshold prescribed by the Act, and accordingly the preparation and submission of an annual modern slavery statement is a mandatory obligation.

This Statement addresses each of the seven mandatory reporting criteria set out in Section 16 of the Act and has been prepared for submission to the Online Register of Modern Slavery Statements maintained by the Australian Government.

This Statement also forms part of the evidence base relied upon for ethical audits conducted under the Sedex Members Ethical Trade Audit (SMETA) 4-Pillar framework and aligns our public reporting with the Ethical Trading Initiative (ETI) Base Code, to which GMP subscribes.

## 2. ABOUT GUNDAGAI MEAT PROCESSORS

Gundagai Meat Processors is one of Australia's most progressive and trusted lamb processors. The Barton family has been associated with the Gundagai meat industry for almost one hundred years, spanning three generations. Our modern processing facility was established in 1974 on a property originally owned by Frederick W Barton, and the business has grown from processing approximately 5,000 lambs in its first year to processing more than one million sheep and lambs annually today.

### 2.1. At a glance

<b>Legal entity</b>	Hirino Pty Ltd as trustee for the Barton Unit Trust, trading as Gundagai Meat Processors.
<b>Headquarters</b>	2916 Gocup Road, South Gundagai NSW 2722, Australia.
<b>Ownership</b>	100% Australian owned; part of the Barton Group.
<b>Industry</b>	Meat processing (sheep and lamb).

<b>Workforce</b>	Approximately 350 employees, comprising Australian citizens, permanent residents and others, and workers engaged across three Australian Government visa programs — the Pacific Australia Labour Mobility (PALM) scheme, the Meat Industry Labour Agreement (MILA), and the Working Holiday program.
<b>Annual throughput</b>	Approximately 1,000,000 sheep and lambs processed per annum.
<b>Export status</b>	Tier 2 export certified; approved to export to approximately 70 countries.

### 3. OUR OPERATIONS AND SUPPLY CHAINS

#### 3.1. Our operations

GMP's operations are conducted from a processing facility located in South Gundagai, New South Wales, mid-way between Sydney and Melbourne. The facility receives livestock from Australian producers, processes lambs to client specification, chills carcasses through one of the most advanced lamb carcass chilling systems in the world, and dispatches finished product through established logistics networks to domestic and international customers.

GMP's workforce of approximately 350 comprises Australian citizens, permanent residents and others, together with migrant workers engaged across three Australian Government-approved visa programs. The composition during the reporting period is outlined in the table below.

<b>Workforce category</b>	<b>GMP Direct</b>	<b>External Labour Hire</b>	<b>Total</b>
Australian citizens, permanent residents and others	154	–	154
Meat Industry Labour Agreement (visa subclass 482/494)	50	–	50
PALM scheme (visa subclass 403)	19	51	70
Working Holiday program (visa subclasses 417/462)	28	47	75
<b>Total</b>	<b>251</b>	<b>98</b>	<b>350</b>

GMP engages workers through a deliberately small number of labour hire partners – a single labour hire provider for the PALM cohort and a separate single provider for the Working Holiday cohort. This concentration is intentional. Engaging one well-known partner per visa stream allows for closer and more consistent oversight of recruitment, accommodation and pay practices than would be possible across multiple intermediaries. Both providers are subject to GMP's labour-provider due diligence framework described in Section 6.

In addition, GMP engages contractors and service providers across cleaning, maintenance, transport and other specialist functions.

As discussed further in Section 9, GMP's intention is to continue progressively transitioning its PALM cohort to direct sponsorship by GMP as an approved employer in its own right.

### 3.2. Our supply chains

GMP's supply chain is predominantly Australian and concentrated in a small number of categories. We do not directly contract with any offshore party; all of our tier 1 suppliers are Australian-based businesses.

Our principal supply chain categories are:

Category	Description
Livestock	Lambs sourced from Australian producers, transported under industry-standard animal welfare and biosecurity requirements.
Labour hire intermediaries	Engagement of migrant workers under the PALM scheme and Working Holiday program through two dedicated labour hire providers (one per visa stream), supplementing GMP's direct engagement of PALM, MILA and Working Holiday workers.
Cleaning and sanitation services	Contracted hygiene and sanitation services supporting daily food-safety requirements at the facility.
Packaging materials	Cartons, film, vacuum bags, labels and pallets supplied through Australian distributors. Underlying materials may be manufactured offshore.
Cleaning chemicals and consumables	Detergents, sanitisers and food-grade consumables supplied through Australian distributors of major regulated chemical brands.
Personal protective equipment and uniforms	Aprons, gloves, footwear, helmets, mesh and laundered workwear, sourced through Australian PPE distributors.
Transport and logistics	Inbound livestock transport and outbound refrigerated freight, contracted through Australian carriers.
Utilities and infrastructure	Electricity, gas, water, telecommunications and waste services from regulated Australian utilities.
Capital equipment and maintenance	Specialist plant, machinery, refrigeration and engineering services, primarily supplied and serviced by Australian companies.
Professional services	Legal, accounting, insurance, banking, IT and consultancy services from Australian professional firms.

## 4. MODERN SLAVERY RISKS

GMP recognises that the location of our tier 1 operations in Australia, and the predominantly Australian nature of our supply chain, do not by themselves eliminate modern slavery risk. The Company has assessed risk by reference to three lenses: sector and product risk; geographic risk; and workforce or labour-model risk. Where these overlap, the inherent risk is correspondingly higher.

### 4.1. Risks in our operations

Meat processing is recognised internationally as a sector with above-average modern slavery risk. Contributing factors include the use of migrant labour, the physical demands of the work, language

barriers, regional location, and the historical prevalence of labour hire intermediation. GMP operates against the backdrop of these sector-wide factors and has designed its controls accordingly.

Within our workforce, the principal risk categories are:

- **Working Holiday workers engaged through a labour hire provider** (47 workers, subclasses 417/462): the use of an intermediary, combined with the structural characteristics of the Working Holiday visa – short stays, the 88-day specified-work requirement that creates leverage in regional sectors, generally younger workers, and higher turnover – places this group among the higher inherent-risk categories in our workforce.
- **Working Holiday workers engaged directly by GMP** (28 workers, subclasses 417/462): direct engagement removes the intermediary risk, but the underlying visa-stream characteristics remain.
- **PALM scheme workers engaged through a labour hire provider** (51 workers, subclass 403): the use of an intermediary creates additional distance between the worker and GMP, which can in some industries reduce visibility of recruitment fees, deductions, accommodation conditions and grievances.
- **PALM scheme workers under direct GMP sponsorship** (19 workers, subclass 403): although direct sponsorship reduces intermediary risk, the workers remain in a position of relative vulnerability owing to migration status, language and distance from home country support networks.
- **Meat Industry Labour Agreement workers under direct sponsorship** (50 workers, subclasses 482/494): these workers are skilled migrants on longer-term visas with a defined pathway and accordingly sit at a lower inherent risk than transient visa cohorts, though employer dependency remains a relevant factor.
- **Contracted cleaning and sanitation workers**: cleaning is a recognised high-risk service category in Australia owing to its high migrant workforce and historically thin margins.

#### 4.2. Risks in our supply chains

Our tier 1 suppliers are Australian businesses, the majority of which are well-established and reputable. We assess direct supply chain risk as generally low for livestock, transport, utilities and professional services. However, we recognise that for packaging, chemicals, PPE and certain capital equipment, the goods supplied by Australian distributors may originate from manufacturing in higher-risk jurisdictions. This represents an indirect (tier 2 and beyond) modern slavery exposure that we are working to develop greater visibility into.

#### 4.3. Risk assessment summary

The following table summarises our assessment of inherent modern slavery risk by category before the application of mitigating controls.

Category	Inherent risk	Key risk drivers
Direct employees (citizens, permanent residents and others)	Low	Covered by Australian workplace law, Enterprise Agreement, ISO 45001 and grievance mechanisms.
MILA workers – direct sponsorship by GMP (482/494)	Low – Medium	Skilled migrants on longer-term visas with a defined pathway; employer dependency remains.

Category	Inherent risk	Key risk drivers
PALM workers – direct sponsorship by GMP (403)	Medium	Migrant status, language, distance from home, dependency on employer for visa and accommodation.
PALM workers – engaged via labour hire (403)	Medium – High	Same factors as direct PALM plus an additional employer intermediary in the relationship.
Working Holiday workers – direct engagement (417/462)	Medium	Short-stay visa, 88-day specified-work requirement, younger and more transient workforce.
Working Holiday workers – engaged via labour hire (417/462)	Medium – High	Same factors as direct Working Holiday plus an additional employer intermediary in the relationship.
Contracted cleaning and sanitation workers	Medium	Industry-wide migrant workforce; thin contract margins; historical sector cases.
Livestock suppliers (Australian producers)	Low	Australian agricultural employment regulated; small workforces; long-term relationships.
Packaging, chemicals, PPE (tier 2 and beyond)	Medium	Australian distributor at tier 1 but underlying manufacture may occur in higher-risk jurisdictions.
Transport and logistics	Low	Australian carriers under heavy industry regulation.
Professional and corporate services	Low	Australian regulated providers.

*This assessment is reviewed annually and updated when there is a material change in workforce composition, supplier base, or external risk environment.*

## 5. GOVERNANCE AND MANAGEMENT SYSTEM

### 5.1. Governance

Oversight of modern slavery matters at GMP follows the Company's broader governance structure:

- The Board of GMP, chaired by an independent Chairperson, has ultimate accountability for the Company's response to modern slavery risk and for the approval of this Statement.
- The Senior Leadership Team, comprising three executives including the Chief Executive Officer, has responsibility for day-to-day implementation of the modern slavery management system, including resource allocation, policy maintenance, audit program delivery and review of incidents and grievances.
- Functional ownership is allocated to the relevant functional leads – for example, recruitment and labour hire risks sit with the Human Resources function, supplier risk sits with Procurement and Quality, and audit and certification sits with the Compliance function – all reporting through to the Senior Leadership Team.

### 5.2. Policy and management system framework

The Company's modern slavery management system is supported by an integrated framework of policies, procedures and operating controls. The principal elements are listed below.

<b>Element</b>	<b>Purpose</b>
Code of Conduct	Sets the ethical standards expected of all GMP personnel, including the prohibition of any conduct that would constitute modern slavery.
Human Rights Policy	Articulates GMP's commitment to fundamental human rights and the ETI Base Code.
Modern Slavery and Forced Labour Prohibition	Explicit prohibition of forced, bonded, child and trafficked labour in any part of the business or its supply chain.
Anti-Bribery and Anti-Corruption Policy	Prevents corrupt conduct that can enable or conceal modern slavery practices.
Whistleblower Policy	Confidential reporting channel for employees, contractors and suppliers, with protection from reprisal.
Workplace Grievance Procedure	Day-to-day mechanism for workers to raise concerns, including in their first language where required.
Recruitment Due Diligence Procedure	Controls covering recruitment fees, right to work, identity verification and conditions of engagement, with heightened steps for PALM workers.
Approved Supplier Program	Pre-engagement due diligence on suppliers and labour providers, with ongoing review.
Enterprise Agreement	Sets fair and transparent terms of employment for direct employees, providing for at-or-above-award rates and lawful conditions.
Incident and Risk Reporting	Captures and escalates safety, ethical and human rights incidents through to the Senior Leadership Team.
Annual Management System Review	Formal annual review of the effectiveness of the modern slavery management system, feeding into this Statement.

## **6. ACTIONS TO ASSESS AND ADDRESS RISKS**

This section sets out the principal actions taken during the reporting period to assess and address the modern slavery risks identified in Section 4.

### **6.1. Due diligence on labour providers**

GMP engages a single dedicated labour hire provider for each of its PALM and Working Holiday cohorts. This concentration to one partner per visa stream is a deliberate risk-management choice; it allows materially closer and more consistent oversight than a multi-provider model would permit.

Each labour hire provider is subject to pre-engagement and ongoing due diligence covering: verification of approved-employer status (for the PALM provider) and Fair Work compliance, labour-hire licensing and visa-handling capacity (for the Working Holiday provider); review of recruitment practices, including the prohibition of recruitment fees or wage deductions inconsistent with PALM and Fair Work standards; review of accommodation provided to or arranged for workers; and ongoing oversight of payslips, deductions and working conditions.

Direct worker-engagement channels are maintained between GMP and labour-hire-engaged workers across both cohorts so that issues can be raised independently of the intermediary.

## **6.2. Direct sponsorship of PALM workers**

During the reporting period, GMP continued the expansion of its own approved-employer arrangements under the PALM scheme. At reporting date, 19 PALM workers were directly sponsored by GMP. Direct sponsorship gives the Company a single, unbroken relationship with the worker covering recruitment, mobilisation, accommodation, pastoral care, payroll and end-of-placement repatriation. We consider this to be a structurally lower-risk model than reliance on labour hire intermediaries and have committed to its progressive expansion (see Section 9).

## **6.3. Worker support and welfare**

Migrant workers across the PALM, Working Holiday and MILA programs are supported by dedicated GMP personnel responsible for pastoral care and community integration. Workers are briefed on their rights and the avenues available to raise concerns from the point of arrival. Accommodation provided to or arranged for migrant workers is reviewed against the relevant program standards (including PALM scheme accommodation requirements for PALM workers). Translated materials are used where needed to ensure that workers – regardless of visa stream – understand the policies, procedures, grievance channels and welfare supports available to them.

## **6.4. Supplier due diligence**

Suppliers are engaged through the Approved Supplier Program, which includes a pre-engagement assessment and a commitment to align with GMP's ethical standards. We expect suppliers to operate consistently with the principles of the ETI Base Code and the Modern Slavery Act, and to extend equivalent expectations to their own suppliers. During FY25 the Company continued to deepen the rigour of supplier review for higher-risk categories, in particular cleaning services and consumables whose underlying manufacture may occur in higher-risk jurisdictions.

## **6.5. Training**

All GMP employees complete training aligned with the ETI Base Code. The training covers the indicators of modern slavery, the rights and responsibilities of workers and managers, and the avenues by which concerns can be raised. Refresher training is delivered annually. Specific role-based training is provided to recruitment, supervisory and procurement personnel whose decisions most directly affect modern slavery risk.

## **6.6. Worker voice and grievance mechanisms**

GMP maintains multiple channels through which any worker – Australian, migrant (across any of the visa programs through which we engage workers) or contractor – can raise concerns. These include the Workplace Grievance Procedure, the confidential Whistleblower Policy, direct access to Human Resources personnel, and access to PALM scheme support arrangements for PALM workers. Concerns are recorded, triaged, investigated and resolved through the incident management system, with escalation to the Senior Leadership Team where appropriate.

## **6.7. Audit and assurance**

GMP's modern slavery management system is tested through a combination of internal and external assurance:

- Sedex SMETA 4-Pillar audit – independent ethical audit covering labour standards, health and safety, environment and business ethics.

- Government program oversight — regulatory monitoring of compliance with PALM scheme requirements (applicable to GMP as an approved employer and to our PALM labour hire provider), and oversight by the Department of Home Affairs and Fair Work Ombudsman in respect of our Working Holiday and MILA cohorts.
- ISO 45001 audit – independent certification of the occupational health and safety management system.
- Internal Audit System – scheduled internal audits across operational and people-related controls.
- Ongoing legislative review – monitoring of changes to Australian and international human rights, modern slavery and labour law relevant to the business.

## **6.8. Remediation**

Where an issue is identified – whether through audit, grievance, incident report or supplier review – GMP's response is to: investigate the matter promptly; engage the affected worker or workers in a way that is supportive and free from reprisal; work collaboratively with the relevant supplier, labour provider or internal function to address the root cause; implement corrective action; and monitor the outcome to ensure it has been sustained. The Company will use its commercial influence, including up to disengagement of a supplier or labour provider, where corrective action is not forthcoming.

## **7. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS**

Assessing effectiveness is one of the most difficult aspects of modern slavery reporting, because the absence of identified cases is not, on its own, evidence that controls are working. GMP therefore uses a combination of quantitative and qualitative indicators, reviewed annually by the Senior Leadership Team and reported to the Board, to test whether our actions are having the intended effect.

### **7.1. Quantitative indicators**

- Completion rate of ETI Base Code training across the direct workforce, and of refresher training annually.
- Proportion of migrant workers engaged directly versus through labour hire intermediaries, broken down by visa program, and progress against our PALM direct-sponsorship transition target.
- Number of grievances and whistleblower reports received, the proportion related to potential modern slavery indicators, and time-to-resolution.
- Number and proportion of approved suppliers with current ethical declarations on file.
- Outcomes of SMETA, PALM and ISO 45001 audits, including the number, type and closure status of any findings.
- Number of remediation actions opened and closed during the period.

### **7.2. Qualitative indicators**

- Worker feedback collected through informal pastoral care channels, exit interviews and the grievance system, particularly from migrant workers across the PALM, Working Holiday and MILA cohorts.

- Feedback from auditors, customers and other external stakeholders on the maturity of the Company's controls.
- Management's own assessment, documented in the Annual Management System Review, of where controls remain weakest and where additional investment is required.

### **7.3. How findings feed back into the system**

The outputs of the Annual Management System Review, together with the findings of external audits and the trends emerging from grievance and incident data, are used to update the Company's modern slavery risk assessment and to set priorities for the following year. Material findings are escalated to the Board through the CEO.

## **8. CONSULTATION**

This Statement is made by Gundagai Meat Processors as a single reporting entity. GMP does not own or control any other entity for the purposes of this Statement, and accordingly the consultation requirement applicable to entities reporting jointly under the Modern Slavery Act 2018 (Cth) does not apply.

Within the Company, the Statement has been prepared in consultation with the Senior Leadership Team and with input from the Human Resources, Procurement, Quality and Compliance functions. It has been reviewed and approved by the Board.

## **9. LOOKING AHEAD**

GMP's modern slavery program is built on the assumption that risk management in this area is never finished. In the next reporting period and beyond, the Company intends to:

- continue progress toward a fully direct sponsorship model for PALM workers, reducing the proportion of workers engaged through labour hire intermediaries;
- further develop tier 2 visibility for higher-risk consumable categories (in particular packaging, cleaning chemicals and PPE), through deeper engagement with Australian distributors about the origin of the goods they supply;
- maintain our deliberately concentrated labour hire model — a single trusted provider per visa stream — and continue to deepen the due diligence and worker-voice arrangements that this concentration is designed to support;
- maintain SMETA 4-Pillar certification and act on any opportunities for improvement identified by independent auditors;
- refresh the modern slavery risk assessment annually, and following any material change in workforce composition or supplier base;
- continue to invest in training, with a particular focus on supervisors and procurement personnel whose decisions most directly affect modern slavery outcomes; and
- review the resourcing and structure of the modern slavery program as the Company grows.

## **10. APPROVAL**

This Modern Slavery Statement is made under the Modern Slavery Act 2018 (Cth) in respect of the financial year ended 30 June 2025.

It was approved by the Board of Hirino Pty Ltd (ACN 001 574 803), being the principal governing body of the reporting entity (Hirino Pty Ltd as trustee for the Barton Unit Trust, trading as Gundagai Meat Processors), on 26 May 2026.

It is signed by William J Barton, in his capacity as Chief Executive Officer and as a responsible member of the reporting entity within the meaning of Section 4 of the Act, authorised by resolution of the Board of Hirino Pty Ltd to sign this Statement.

A handwritten signature in black ink, appearing to read 'W. Barton', written over a faint circular stamp or watermark.

**William J Barton**  
Chief Executive Officer  
Gundagai Meat Processors

Date: 26 May 2026