

## MODERN SLAVERY STATEMENT



# CONTENTS

SUMMARY OF OUR RESPONSE TO THE MODERN SLAVERY ACT 2018 (CTH)	1
1. INTRODUCTION	2
2. IDENTIFY THE REPORTING ENTITY	3
3. OUR OPERATIONS & SUPPLY CHAINS	5
4. OUR MODERN SLAVERY RISKS	9
5. ASSESSING AND ADDRESSING MODERN SLAVERY RISK	11
6. REMEDIATION OF MODERN SLAVERY RISKS	16
7. MEASURING EFFECTIVENESS AND OUR FUTURE COMMITMENTS	17
8. CONSULTATION WITH OWNED AND CONTROLLED ENTITIES	20



# SUMMARY OF OUR RESPONSE TO THE MODERN SLAVERY ACT 2018 (CTH)

CRITERIA	DESCRIPTION	REFERENCE IN THIS STATEMENT
Identify the reporting entity (S16 (1) (a))	Harvest Road Group Pty Ltd	Approval & Our Structure – Page 3
Describe the structure, operations and supply chains of the reporting entity (s16 (1) (a) – (b))	Harvest Road Group is a food company that produces a portfolio of high quality products sold under the brands, Harvey Beef, Ernest Green & Sons and Leeuwin Coast, for domestic and international markets. Our products are exported to over 30 different countries.	Approval & Our Structure – Page 3 Our Operations & Supply Chains – Page 5–8
Describe the risk of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls (s16 (1) (c))	Harvest Road Group has identified the following modern slavery risks in its operations and supply chains: <ol style="list-style-type: none"> <li>1. Seasonal and migrant workers</li> <li>2. Australian beef cattle supply chain</li> <li>3. Argentina beef product supply chain</li> <li>4. Australian meat product supply chain</li> <li>5. Uniforms</li> <li>6. Solar panel procurement</li> </ol>	Our Modern Slavery Risks (Supply Chain Risks & Operational Risks) – Page 9–10
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes (s16 (1)(d))	<ul style="list-style-type: none"> <li>• Established and implemented a governance framework.</li> <li>• Established a modern slavery working group.</li> <li>• Conducted an audit of high risk suppliers and facilities.</li> <li>• Undertook an audit of migrant workers employed at our beef processing facility in Harvey under the Pacific Australian Labour Mobility (PALM) scheme.</li> <li>• Facilitated SEDEX third party audit.</li> <li>• Issued Self-Assessment Questionnaires (SAQ's) to suppliers.</li> <li>• Provided internal education and modern slavery training.</li> <li>• Engaged with suppliers to ensure issues are understood and drive continual improvement.</li> <li>• Implemented risk mitigation and remediation framework for workforce.</li> </ul>	Assessing and Addressing Modern Slavery Risk – Page 11–12  Case Study – Page 10  Due Diligence Undertaken to Address Modern Slavery Risks – Page 13  Assessing and Addressing Modern Slavery Risk – Page 11–12  Action Taken in Key Risk Areas – Page 15  Remediation of Modern Slavery Risks – Page 16
Describe how the reporting entity assess the effectiveness of such action (s16 (1) (e))	Implemented a 'measuring effectiveness framework' and development of future commitments.	Measuring Effectiveness and our Future Commitments – Page 17–19
Describe the process of consultation with any entities that the reporting entity owns or controls (s16 (1) (f))	Engagement across all entities for consistent modern slavery approach, including oversight by central Head of ESG.	Consultation with Owned & Controlled Entities – Page 20  Approval & Our Structure – Page 3



# 1. INTRODUCTION

On behalf of Harvest Road Group, I am proud to present our first standalone Modern Slavery Statement.

Delivering this statement as previously pledged in last year's joint statement lodged by Tattarang, is an important milestone for Harvest Road Group and demonstrates our courage and determination to fight Modern Slavery.

Harvest Road Group's vision is to deliver Australia's best sustainable produce to the world. Last year, we experienced rapid growth throughout our businesses, and we anticipate continuing growth. We have acquired almost three million hectares of prime pastoral land for our integrated beef supply chain and our feeding facility at Koojan Downs, which is now operational. We continue to invest in preparing our beef processing facility in Harvey to manage the increased capacity, all whilst working towards our sustainability goals and high product quality. Our aquaculture business continues to go from strength to strength, producing premium shellfish products, the exquisite Albany Rock Oysters and unique Akoya.

We understand the nature of our operations in agriculture inherently raises our modern slavery risk, and whilst we continue to experience sustained growth, we have not forgotten the importance of this issue and we continue to focus on sustained improvement.

I acknowledge the businesses throughout our supply chain who have shown support in our mission to uncover and eliminate modern slavery, however there is always more work to do and we will continue working closely with our suppliers and other stakeholders.

Outlined in this statement, we are transparent in discussing how we have progressed in the last year. We have identified new opportunities to work towards for the year ahead, demonstrating our unwavering commitment for continuous improvement. Whilst we have achieved many of our objectives set out in the previous joint statement lodged by Tattarang, we are dedicated to improving, standing alongside businesses, leaders and campaigners fighting to end modern slavery.

Paul Slaughter  
Chief Executive Officer, Harvest Road Group

# 2. IDENTIFY THE REPORTING ENTITY

## Approval & Our Structure

This Statement is published on behalf of Harvest Road Group Pty Ltd (ACN 169 138 014) and its owned and controlled entities (referred to collectively in this Statement as “we”, “us”, “our” and “Harvest Road Group”, unless the context requires differentiation of individual entities), to meet the reporting requirements under the Modern Slavery Act 2018 (Cth) (“the Act”) for the year ended 30 June 2022.

Harvest Road Group’s wholly owned subsidiary Harvey Industries Group Pty Ltd (ACN 117 597 985) individually met the Act’s annual revenue threshold for the reporting period (FY21-22). Accordingly, this is a joint Statement on behalf of two reporting entities: Harvest Road Group Pty Ltd and Harvey Industries Group Pty Ltd.

For the previous two reporting periods, Harvest Road Group’s modern slavery reporting obligations have been addressed in the joint Statements lodged by Tattarang. Harvest Road Group has matured in its approach in identifying, assessing and addressing modern slavery, and this reporting period it is pleased to publish a separate modern slavery Statement that sets out how we have developed and implemented a tailored modern slavery report specifically for ‘Harvest Road Group’.

Developing our own modern slavery response independent of Tattarang reflects a commitment to continuous improvement.

This joint Statement sets out details of operations across Harvest Road Group, its supply chains, and measures taken to address risks of modern slavery in line with the Commonwealth Guidance for Reporting Entities.

This Statement addresses the activities of Harvest Road Group Pty Ltd, Harvey Industries Group Pty Ltd and other controlled entities which sit within Harvest Road Group but are not reporting entities in their own right. These controlled entities include:

- Harvest Road Pastoral Pty Ltd (ACN 619 252 621)
- Koojan Downs Pty Ltd (ACN 628 244 628)
- Harvest Road Oceans Pty Ltd (ACN 165 170 445)
- TCG Beverages Pty Ltd (ACN 610 512 939)

Consultation and engagement across Harvest Road Group has occurred in the preparation of this Statement, as well as in relation to Harvest Road Group’s modern slavery response in general. This involved meetings with representatives of the Harvest Road Group’s business operations to collate the information requested. Members of Harvest Road Group’s leadership team participated in the preparation of this Statement. In addition, representatives from Tattarang were consulted and involved in the final review.

The Board’s of Harvest Road Group Pty Ltd and Harvey Industries Group Pty Ltd approved this Statement on 20th December 2022.

This Statement is signed by John Hartman, who is a director of both reporting entities covered by this joint Statement pursuant to section 14(2)(e) of the Act.

Signed by



Director, Harvest Road Group Pty Ltd  
Director, Harvey Industries Group Pty Ltd



# Our Values and Commitment to Ending Modern Slavery

At Harvest Road Group, as with all companies that form part of Tattarang, 10 values are at the heart of everything we do. They drive our culture and philosophy and underpin our approach to conducting business.

We remain committed to acting ethically and with integrity across all aspects of our business. We strive to uphold and protect the rights of all of those who work for, or on behalf of, Harvest Road Group. We are also committed to protecting and respecting the rights of people who may be impacted by our activities, including those in our supply chains.

We continue to acknowledge the risk of modern slavery occurring in our own operations and supply chain, and that significant resources must be invested, on an ongoing basis, in building, implementing and continuously improving effective systems and processes to address these risks.

Building on the foundations from the first two reporting periods, as reflected in the joint Statements lodged by Tattarang, Harvest Road Group is continuing to gain a deeper and more comprehensive understanding of the range of modern slavery risks present within our supply chains and operations.

## OUR VALUES

### **Courage & Determination**

NEGU – we never ever give up

### **Generating Ideas**

Always be on the lookout for breakthroughs

### **Empowerment**

Go to your leader for advice, not permission

### **Humility**

Be vulnerable, take risks to trust others

### **Enthusiasm**

Be the most positive person in the room

### **Integrity**

Do what you say you're going to do

### **Family**

Support each other, always be kind

### **Safety**

Look out for your mates and yourself

### **Frugality**

Think of ways we can do things better, faster, cheaper, safer

### **Stretch targets**

Always be uncomfortable with your level of challenge

# 3. OUR OPERATIONS & SUPPLY CHAINS

## Who we are

Harvest Road Group is proudly Western Australian. We are part of Tattarang, one of Australia's largest private investment groups owned by the Forrest family.

Our vision is to deliver Australia's best sustainable produce to the world.

At Harvest Road Group, we don't commodify food. We honour it. We honour the land it comes from; we honour the growers that tend it, we honour the people and local communities who bring it to market. Our rugged, untouched lands and wild oceans offer ingredients unlike anywhere else. It is our privilege to share this superior quality with the world.



# Our Operations

**Harvest Road Group** is a food company that produces a portfolio of ethically produced, high quality food sold under the brands, Harvey Beef, Ernest Green & Sons and Leeuwin Coast.

*Our products are sold domestically and internationally, exported to over 30 different countries.*

We believe that responsible business requires the production of sustainable food through ensuring positive environmental impact, adopting ethical labour practices and exceeding industry benchmarks for animal welfare.

For more information see: [www.harvestroad.com](http://www.harvestroad.com)

## Agribusiness

Critical to our vertically integrated premium quality beef supply chain are our pastoral properties and farms, which cover 2.7 million hectares across Western Australia.

We have invested significantly in breeding and genetics initiatives to maximise the potential of Western Australia's distinctive terrain and climate. Our strategy involves breeding cattle that thrive in the state's unique climate, which in turn leads to the production of the finest beef for our customers.

Our Koojan Downs feeding facility, located 150km north of Perth, is an integral component of our vertically integrated beef supply chain. Our feeding facility has been designed to supply 60,000, 100-day grain-finished cattle each year to our processing facility. The newly built feeding facility ensures the maintenance of the highest animal welfare standards and best-practice ecological planning.

We also have a horticulture farm in Carnarvon, which produces mangoes, sweet potatoes and blue agave.

For more information see:  
[www.harvestroad.com/our-business/our-stations](http://www.harvestroad.com/our-business/our-stations)

## Harvey Beef

Our highly efficient beef processing facility in Harvey is located 140km south of Perth. Our beef products are exported to over 30 different countries.

Our processing facility produces fine quality beef that is sustainably raised in the pristine natural environment of Western Australia. We source cattle from across Western Australia and use this quality to distinguish our beef brands from other providers.

We take pride in producing beef that consumers can feel good about. Our animal welfare standards, ethical labour and farming practices and local sourcing practices means that we are continually improving and implementing uncompromising standards.

Our beef is distributed through the iconic brands Harvey Beef and Ernest Green & Sons.

For more information see:  
[www.harveybeef.com.au/about-us](http://www.harveybeef.com.au/about-us)

## Leeuwin Coast

Under our brand Leeuwin Coast, we grow and sell two shellfish species; Rock Oysters and Akoya. Our aquaculture farms are found in the coastal waters of WA, spanning more than 1000km, from the pristine waters off Albany in the spectacular Great Southern region to the warm waters of Shark Bay. Honouring our oceans through sustainable work practices underpins the way we operate.

We are proud that our shellfish products are certified carbon neutral by Climate Active, which is an Australian Government initiative that imposes one of the strictest certifications of its type anywhere in the world. We are also certified by Friends of the Sea, demonstrating our unwavering commitment to sustainable aquaculture practices and social accountability.

For more information see:  
[www.leeuwincoast.com/about-us](http://www.leeuwincoast.com/about-us)

## TCG Beverages

Our small batch distillery is located on Tattarang Farm, 120 acres of tamed wilderness at the southern tip of Western Australia's Darling Scarp. Led by a distiller, a chef and horticulturalist, our process of hand-crafting small batches of premium quality spirits is underpinned by a true grain-to-glass philosophy. Most of the ingredients in our gins and vodka are foraged, grown and crafted by us, on site.







## Our Employees

During this reporting period, Harvest Road Group employed a total of 866 people. The breakdown of employment types is set out below. It included 696 full-time employees (comprising 80% of all employees), 11 part-time employees, three fixed-term contracted employees and 156 casual staff.

*Most of our workforce (99.8%) is based in Australia.*

All our staff are employed in strict compliance with local laws and regulations. Our Australian terms and conditions of employment are underpinned by the Fair Work Act 2009 and the National Employment Standards (NES).

In relation to our contracted labour hire workers, we ensure strict compliance with the NES.

For example, the following minimum terms are set out in all employee and labour hire worker contracts and communicated clearly:

- hours of work;
- remuneration;
- leave entitlements, including annual leave, public holidays, parental leave, compassionate leave, personal/carer's leave, community leave, jury service leave and family and domestic violence leave;
- benefits; and
- notice period.

All of our labour hire workers are paid the Australian living wage at a minimum.

As indicated in the Global Estimates of Modern Slavery 2022 report published by international human rights organisation Walk Free, migrant workers are three times more likely than non-migrants to be in forced labour. How we have addressed the elevated modern slavery risk in relation to our contracted workers is discussed on page 15.

ENTITY NAME	TOTAL	FULL-TIME (OR EQUIVALENT)	PART TIME	CASUAL	FIXED TERM CONTRACT	OTHER FEATURES
Harvest Road Group Pty Ltd	52	50	1	0	1	Two migrant workers
Harvey Industries Group Pty Ltd	684	545	0	139	0	297 members (43%) of the Harvey Industries Group workforce are migrant workers
Harvest Road Oceans Pty Ltd	44	38	2	3	1	One migrant worker
Harvest Road Pastoral Pty Ltd	59	40	7	11	1	One migrant worker
Koojan Downs Pty Ltd	22	19	1	2	0	One migrant worker
TCG Beverages Pty Ltd	5	4	0	1	0	Zero migrant workers

# Our Supply Chains

During the reporting period, Harvest Road Group engaged 1,972 direct suppliers in the first tier of our supply chain, being those suppliers that we have a direct contractual relationship with ("Tier One Suppliers").

**98.74%** of our Tier One Suppliers are headquartered in Australia.

We are aware of the complex global supply chains, our Tier One Suppliers, and the sourcing of many products purchased from local companies are manufactured, or have significant component part input from, overseas.

**Our two largest categories of spend** (by total relative amount) are Australian-based cattle products/live animals and Australian-based non-building construction work that is required to operate and improve our current facilities and construct new facilities.

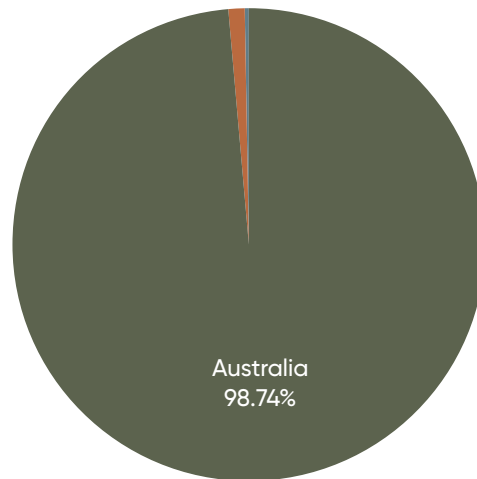
We also have a small number of overseas suppliers. We continue to develop authentic working relationships with as many suppliers as possible. The graph below sets out total supplier spend by country.

The main industry categories that we source from overseas include:

- transport services;
- beef products;
- leather and textile products; and
- other business and retail trade services.

## Total supplier spend by country

Australia 98.74%	China 0.03%
Argentina 0.98%	South Korea 0.02%
United Kingdom 0.10%	Italy 0.01%
USA 0.08%	Other countries 0.01%
New Zealand 0.03%	



We engaged with around 450 more individual suppliers during this reporting period in comparison to the last period. This reflects the continued growth of our business, with the most significant increase in spend on the procurement of animal breeding/beef cattle suppliers. As our supplier base has grown, we have undertaken comprehensive modern slavery risk assessments on all new suppliers.

The increased spend in **Australian-based non-building construction** primarily relates to non-recurring investment in capital works projects due to the expansion of our core primary business activities, including:

- Harvey Beef Construction Project: expansion of our existing beef processing facility in Harvey;
- Koojan Downs Construction Project: the construction of a new cattle feeding facility near Koojan;
- Harvest Road Oceans Construction Project: expansion of existing aquaculture leases, nursery and associated infrastructure in Albany; and
- Balfour Downs: capital expenditure in connection with a newly acquired cattle station in the Pilbara.

# 4. OUR MODERN SLAVERY RISKS



## Operational Risks

### Seasonal workforce variations and increased reliance on select labour hire agencies

To meet the operational needs strongly tied to a seasonal business model and due to the impact of COVID-19, we sourced workers through reputable labour hire contractors.

We have also continued to participate in the Pacific Australian Labour Mobility (PALM) scheme, to employ workers for our beef processing facility in Harvey. A full description of our participation of the scheme is set out on page 13 of this Statement.

### Migrant workers in the beef processing facility in Harvey

We understand that migrant workers may be more vulnerable to exploitative practices than local employees. Some of the factors contributing to potentially increased vulnerability include:

- practices such as deceptive recruitment by labour hire agencies, which can result in compounding debt bondage;
- hesitation to speak out for fear of having visa or immigration status revoked;
- pressure to continue to financially support family members located in low socioeconomic geographies; and
- lower-level English skills and minimal awareness about rights and protections under Australian law.

Given the specific modern slavery risks associated with using labour hire agencies, we have carried out specific due diligence to ensure that no workers were recruited through any approach or practice that was in any way unfair, coercive or exploitative.

A full description of the due diligence activities undertaken in relation to the recruitment of migrant workers is set out on page 15.

### Uniforms

Many of our employees wear uniforms. We recognise that the manufacture of such apparel and associated supply chains are areas of potentially significant modern slavery risk. As noted in the previous joint Statement lodged by Tattarang, Harvest Road Group has conducted due diligence on existing garment suppliers. While there were no instances of modern slavery or exploitation found, we are working with our Tier One Suppliers to enhance their risk management practices and encourage best practices.

### Solar Panel Procurement Project (upcoming/scoping phase)

Harvest Road Group continues to scope the procurement of solar panels to maximise the use of renewable energy in our day-to-day operations.

While we are excited about the benefits of an energy transition that will significantly reduce the overall carbon footprint of our operations, we are conscious of the real and direct risk of human rights abuses associated with global solar energy supply chains. Accordingly, throughout the scoping and planning phase of this project we have included detailed supply chain due diligence.

# Supply Chain Risks

To identify modern slavery risks in our operations and supply chains, Harvest Road Group conducts modern slavery risk assessments of our suppliers to identify risk based on the industry and country of those suppliers.<sup>1</sup> Supply chain mapping was performed using software developed by Fair Supply. The global Multi-Regional Input-Output (MRIO) table links supply chain data from 190 countries and in relation to 15,909 industry sectors. The MRIO is then examined against international standards. This process generates a modern slavery risk profile reflecting 10 tiers of our suppliers. This helps us to achieve maximum practical visibility, from the raw materials used in the production of goods through to the services ultimately provided by our suppliers.

Notwithstanding the expansion of our supplier base, we have not observed a significant increase in our overall modern slavery risk profile between this and the last reporting period reflected in the previous joint Statement lodged by Tattarang.

During this reporting period, Harvest Road Group has identified the following categories with the highest potential overall modern slavery risk exposure (considering inherent industry category risks and our relative spend amounts):

- Australian beef cattle supply chain;
- Argentina beef product supply chain; and
- Australian beef product supply chain.

This updated assessment has confirmed that the elevated areas of potential risk are concentrated at, or proximate to, our Tier One Suppliers. This reiterates that, not only do we need to be highly vigilant in our modern slavery response, but that we also have a huge opportunity to effect meaningful change through our ongoing due diligence and mitigation efforts.

---

<sup>1</sup> This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:

- The United Nations' (UN) System of National Accounts;
- UN COMTRADE databases;
- Eurostat databases;
- The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
- Numerous National Agencies including the Australian Bureau of Statistics.

The MRIO is then examined against the following international standards:

- The UN Guiding Principles on Business and Human Rights;
- The Global Slavery Index;
- International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
- The United States' Reports on International Child Labour and Forced Labour.

A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for Harvest Road Group's suppliers.

## CASE STUDY

### The identification of modern slavery risks and our response to impact procurement decisions

As a result of our updated modern slavery risk assessment for this reporting period, one of Harvest Road Group's Tier One Suppliers was identified as having an elevated modern slavery risk profile on the basis that one of its offshore suppliers has possible linkages to forced labour. Once this risk was identified, Harvest Road Group undertook a comprehensive desk top audit of the Tier One Supplier and its suppliers.

Following assessment of the audit results, Harvest Road Group engaged with the Tier One Supplier to discuss opportunities for improvements in their supply chain.

Despite these consultations, it was decided that the product was no longer required, and the decision was made by Harvest Road Group to cease engagement with the Tier One Supplier.

This process has confirmed the effective operation of our well-defined pathway for assessing modern slavery risk, which we are continuing to undertake prior to any procurement decisions being made.





# 5. ASSESSING AND ADDRESSING MODERN SLAVERY RISK

## Our Governance Framework

### Procurement Guidelines

Our ethical procurement practices are outlined in the Harvest Road Group Procurement Policy, including the process for identifying, assessing and addressing modern slavery risk throughout the procurement process ("HRG Procurement Policy").

### Purchase Order Processes

During the reporting period, our purchase order documentation was updated to include terms and conditions that specifically address modern slavery risks ("Purchase Order Terms").<sup>2</sup>

The key terms of the new Purchase Order Terms which address modern slavery risks include:

- Each supplier warrants that steps have been taken by them to identify and address modern slavery in their own operations and supply chain. This specifically includes an appropriate grievance mechanism consistent with the criteria set out in the United Nations' Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy Framework."
- Each supplier warrants that if they suspect or become aware of modern slavery risk in their operations and supply chains, they must take all reasonable action to address or prevent these practices, including remediation and disclosure of the instance to us.

- Each supplier must have an appropriate grievance mechanism in place.
- Each supplier is prohibited from requiring any personnel from paying recruitment (or related) fees to secure employment and is prohibited from possessing the original of any workers personal identification documents.

### Supplier Code of Conduct

Harvest Road Group adopts the Tattarang Supplier Code of Conduct which outlines our expectations of suppliers and their conduct regarding the core principles listed in our Modern Slavery Policy. This includes workplace health and safety, environmental protection, and ethical practices. We expect that suppliers investigate their labour practices and supply chains, and promptly address any cases of modern slavery or related exploitation and report these to us.

### Harvest Road Group Modern Slavery Working Group

Harvest Road Group operates its own internal Modern Slavery Working Group. This Group is comprised of our Head of ESG, General Manager of People and Safety, and supported by the Sustainability Officer and People Systems Business Partner, and sponsored by the Chief Operating Officer. The standalone Group supports and facilitates our modern slavery actions across each of the operating businesses within Harvest Road Group and ensures that all initiatives to address modern slavery are effectively implemented.

---

<sup>2</sup> This was completed between the time of the end of the reporting period and publication of this modern slavery Statement.

## Specific Policies for Harvest Road Group

Harvest Road Group has its own suite of internal policies to address modern slavery risk. These policies are tailored to Harvest Road Group's business operations and reflect the history of its business, its risk management approach, and the higher inherent modern slavery risk associated with certain industries in which Harvest Road Group operates.

### Modern Slavery Policy

During the reporting period, Harvest Road Group developed and implemented its own Modern Slavery Policy ("HRG Modern Slavery Policy"). The HRG Modern Slavery Policy complements Tattarang's overarching modern slavery framework, while specifically addressing modern slavery risks that arise from our unique operations and supply chain.

The principles of the HRG Modern Slavery Policy include:

- every worker should have freedom of movement;
- no worker should pay for a job;
- no worker should be indebted or coerced to work, nor subject to threats or abuse;
- workers should be paid fairly for the work they do;
- no child labour;
- respect rights of workers to freedom of association; and
- workers should have access to an operational-level grievance mechanism.

## TATTARANG MODERN SLAVERY FRAMEWORK AND MODERN SLAVERY WORKING GROUPS

In addition to our own Harvest Road Group specific policies and practices, we also engage with and continue to actively implement the broader Tattarang Modern Slavery Framework.

We remain fully engaged with Tattarang on how we can continuously improve our approach to identifying, assessing and addressing modern slavery issues.

Harvest Road Group is an active member of the Tattarang Modern Slavery Working Group, which is continuously monitoring our progress in responding to modern slavery across Tattarang. Our representation in this group includes our Head of ESG and Sustainability Officer.

The Tattarang Modern Slavery Working Group meets monthly to consider and direct Tattarang's overall approach to modern slavery, including "end goals" of each business and streamlining processes to achieve specific objectives across Tattarang.

## Code of Conduct

The Code of Conduct includes our commitment to respect human rights of all people, including employees, partners and the communities in which we operate.

*Our Code of Conduct prohibits all forms of modern slavery.*

### Whistleblower Policy

Harvest Road Group has developed its own Whistleblower Policy ("HRG Whistleblower Policy") which provides a practical tool for our stakeholders to disclose risk or wrongdoing in the workplace. The HRG Whistleblower Policy ensures that those who make disclosures will be protected and supported throughout the process.

### Recruitment and Selection Procedure

Harvest Road Group's staff recruitment and selection procedure supports management and staff to appoint the most capable people to roles across the business. To address modern slavery risk factors, we ensure that international guidelines and local legislation in relation to minimum working age is adhered to.



# Due Dilligence Activities Undertaken

Given the elevated risk of modern slavery in industries within which Harvest Road Group operates, we recognise the importance of effectively addressing those risks and continually improving our overall modern slavery response.

Some of the due diligence measures described in this section were completed subsequent to the conclusion of the 2021/22 reporting period but prior to the lodgement of this Statement.

## Our involvement in the Pacific Australian Labour Mobility (PALM) scheme and related due diligence activities

During the reporting period, we participated in the Pacific Australian Labour Mobility (PALM) scheme ("the Scheme") for migrant workers for employment at our beef processing facility in Harvey. The Scheme is managed by the Department of Foreign Affairs and Trade (DFAT) and the Department of Employment and Workplace Relations (DEWR) with the support of an external provider, the Pacific Labour Facility (PLF). Before participating in the Scheme, we had to satisfy a strict criterion established by the Australian Government.

*Our participation has been recognised by the Australian Government as a "gold standard" in the treatment of workers in the Scheme.*

We maintain this "gold standard" by ensuring that, in addition to the strict requirements of the Scheme, the

following key activities are undertaken by Harvest Road Group:

- Employment contracts for all workers are translated into the applicable local language.
- Once workers arrived in Australia, a cash advance, pre-paid mobile phone and food is immediately provided. We also ensured that suitable furnished accommodation in the local community, including pre-connected utilities are organised for all arriving workers.
- To ensure that arriving workers continued to be protected from recognised factors that can create vulnerabilities, we facilitated local community connections, including access to local services and recreation activities.

During the reporting period, we also undertook an onsite audit of our beef processing facility in Harvey. The objective of this audit was to determine whether workers have been treated appropriately throughout the recruitment process which primarily occurred overseas. It included interviewing eight migrant employees who had been recruited through the Scheme.

The audit criteria included an assessment of whether workers were:

- charged or had amounts deducted from their wages not authorised under the Scheme;
- given proper information about the job they would be performing in Australia;
- provided with adequate information about how to raise complaints and report grievances;
- ever placed under pressure to remain in their job; and
- treated the same as local employees and felt respected and supported in their jobs.

The results of the audit demonstrated no concerns. It confirmed that workers engaged under the Scheme had been appropriately treated throughout the recruitment process and into their period of active employment with Harvest Road Group.



## SEDEX – THIRD-PARTY AUDIT OF SERVICE PROVIDER

During the reporting period SEDEX was engaged to undertake a virtual audit of one of Harvest Road Group's Tier One Suppliers. We helped facilitate this audit at the request of the supplier.

The audit included interviews with the supplier's workers and followed an audit framework incorporating the ETI Base Code, a code founded on the conventions of the International Labour Organisation (ILO), an internationally recognised code of good labour practice.

There were no instances of modern slavery or exploitation found, however there were certain practices and procedures which the supplier could update to improve labour practices and further reduce the risk of modern slavery.

We are working with the supplier to strengthen their practices as they relate to the provision of services to Harvest Road Group and improve their overall modern slavery response.

## Self-assessment questionnaires

As part of our ongoing due diligence during the reporting period, Harvest Road Group issued supplier self-assessment questionnaires (SAQ's) relating to modern slavery issues.

The SAQ's sought suppliers responses in the following key areas:

- risk identification and assessment;
- education and training;
- policies and procedures;
- grievance mechanism;
- due diligence;
- measuring effectiveness; and
- remediation.

For the next reporting period Harvest Road Group plans to formalise the process of issuing SAQ's. We have begun to embed the issuing of SAQ's into our broader procurement process to facilitate comprehensive modern slavery risk assessment before purchases are made.

## Pre-contract supplier screening for modern slavery issues

We have established, and continue to develop, a framework for consistently screening prospective suppliers prior to orders being made. The framework involves several phases of engagement and supplier disclosure, depending on the initial level of modern slavery risk determined.

Implementation of this framework has influenced procurement decisions as a result of modern slavery considerations and was the catalyst for conducting desktop audits on certain suppliers. Further enhancement to this framework and screening process is planned for the next reporting period.

## Internal training and education

During the reporting period, our specifically tailored online modern slavery training modules continued to be provided to all employees. This online training ensured that all employees are familiar with specific provisions in relation to our Modern Slavery Policy and Code of Conduct.

We also provided face-to-face training on addressing modern slavery during our in-person induction program to all staff (including those on contracts) working across all the business units. This ensured that our training was more than a "tick the box" for our office staff, but rather rolled out remotely and made fully accessible to all workers.





# Action Taken in Key Risk Areas

As identified in our risk assessment, key focus areas for Harvest Road Group's modern slavery response includes due diligence undertaken in the following identified risk areas:

## Migrant Workers

We continue to take steps to mitigate modern slavery risks in relation to migrant workers, including offshore recruitment processes, through the following:

- maintenance of a "zero fees" recruitment policy, which ensures that no worker pays any recruitment fees during the recruitment process;
- establishing a whistleblower hotline available to all workers and displayed in accessible areas;
- onsite auditing of our facilities with a high portion of migrant workers; and
- ensuring all of our migrant workers are covered by the same employment arrangements as local staff.

## Uniforms

In this reporting period, we continued our ongoing modern slavery due diligence (referred to in the previous joint Statement lodged by Tattarang) in relation to the manufacture of apparel and related supply chains. Potential new suppliers were examined to ensure the selection of the right suppliers in this elevated risk supply chain.

During the reporting period we undertook a desktop audit of existing apparel uniform suppliers. No instances of modern slavery or exploitation were found.

We will continue to work with our suppliers to improve understanding of key modern slavery issues within the apparel industry and encourage our suppliers to 'cascade' our anti-slavery approach deeper into their supply chains.

## Solar Panel Procurement

As part of our product research and selection process for solar projects, products have been shortlisted from manufacturers and suppliers that show continuous monitoring of modern slavery issues. This includes the demonstrated presence of active plans to monitor and address the modern slavery risks associated with polysilicon production.



# 6. REMEDIATION OF MODERN SLAVERY RISKS

Harvest Road Group did not identify any instances of modern slavery during the reporting period. Nonetheless, we remain acutely aware that modern slavery can exist in almost every global supply chain and are committed to improving our risk identification and assessment processes.

If a situation is identified where Harvest Road Group has caused, contributed to or is otherwise directly linked to actual or suspected instances of modern slavery, we are committed to providing remedy, or facilitating access to remedy, for all those adversely impacted. We will do this through the implementation of corrective action plans.

Harvest Road Group has documented its approach to remediation of all incidents of actual or suspected non-conformance (including modern slavery concerns) ("HRG Workplace Investigation Procedure"). This HRG Workplace Investigation Procedure is applicable to both internal and external stakeholders and covers non-conformances, including any material breach of our modern slavery provisions, human rights violations or incidents of modern slavery.

In each case where a serious non-conformance incident is identified, a report is produced and shared with the relevant General Manager. No non-conformances in relation to modern slavery concerns were identified during the reporting period.

Our remediation process is supported by policies which clearly define the procedures undertaken internally to remediate harm. Our Workplace Behaviour Policy outlines the expected behaviour and requirement of all staff to treat others with dignity, courtesy and respect

("HRG Workplace Behaviour Policy"). The HRG Workplace Behaviour Policy names unacceptable workplace conduct in line with legislation including the Australian Human Rights Commission Act.

In the previous reporting period, as detailed in the joint Statement lodged by Tattarang, ("The HRG Employee Grievance and Dispute Resolution Procedure") was translated into the main languages spoken at our beef processing facility in Harvey. A copy of the HRG Employee Grievance and Dispute Resolution Procedure was also sent to all employee's personal email addresses.

As foreshadowed in the previous joint Statement lodged by Tattarang, we completed the development of training material in relation to the HRG Employee Grievance and Dispute Resolution Procedure. This has now been delivered to all current employees and new employees at induction.<sup>3</sup>

All translated documents continue to be stored on the Employee Self Service system (ESS), where employees can access it at any time. The whistleblower hotline continues to be displayed across the beef processing facility in Harvey: in the staff lunch rooms and change rooms.

The expansion of the multilingual display of the whistleblower hotline information on five digital screens across other areas in the beef processing facility in Harvey has also occurred. The display has a total of four different translated languages commonly used by our workers, including Korean, Simplified Chinese, Tagalog and Bislama.

---

<sup>3</sup> This was completed between the time of the end of the reporting period and publication of this modern slavery Statement.



# 7. MEASURING EFFECTIVENESS AND OUR FUTURE COMMITMENTS

## Our Effectiveness

An important measure for transparency in our overall modern slavery response is ensuring there is continuity between reporting periods. This involves providing detailed information on those areas where we have been able to effectively implement key performance indicators, and those where this has not yet been achieved.

The previous joint Statement lodged by Tattarang identified number of specific focus areas for this reporting period. Those focus areas, along with a report on our progress in achieving them during this reporting period, are set out in the table below.

AREA OF FOCUS	IMPROVEMENT	SPECIFIC MEASURES IDENTIFIED FOR THIS (FY21-22) REPORTING PERIOD	PROGRESS REPORT
<b>Governance</b>	Strengthen policies and review contract templates relating to modern slavery.	Identify areas for further improvement in our policies and contracts.	The introduction of the specific Harvest Road Group Modern Slavery Policy.
		Complete a review of the Tattarang policy framework, identify those policies applicable to Harvest Road Group, which are not already addressed by the Harvest Road Group Policy suite, and adapt and implement as appropriate.	The introduction of new Purchase Terms that specifically address modern slavery issues.
		Harvest Road Group to issue its own modern slavery Statement.	Complete.
	Steering Group to increase engagement with each of the operating businesses to understand their future activities and associated risks.	Continuous engagement with operating businesses to better understand their future activities and associated risks.	Complete and ongoing modern slavery working group has continued to operate with other Tattarang businesses.  Harvest Road Group's Head of ESG has engaged with all of our operating businesses to engage in overall response.

AREA OF FOCUS	IMPROVEMENT	SPECIFIC MEASURES IDENTIFIED FOR THIS (FY21-22) REPORTING PERIOD	PROGRESS REPORT
<b>Risk Assessment</b>	Conduct deeper due diligence on medium high-risk suppliers.	Identify priority actions for our medium high-risk/high-spend suppliers to implement and continue to develop relationships.  Expand due diligence to Tier Two of the supply chain.	In progress: SAQ's have been sent to all high-risk suppliers as identified in Fair Supply's Global Multi-Regional Input-Output.
	Conduct deeper due diligence on high-risk suppliers.	Identify priority actions for our high-risk/high-spend suppliers to implement and continue to develop relationships.	In progress: SAQ's have been sent to all high-risk suppliers for Harvest Road Group to determine if further due diligence is required.
	Improve supplier onboarding, risk screening and verification process.	Identify ways to improve our risk screening and supplier assessment processes.  Roll out new purchase order system.	In progress: New purchase order system has been implemented with the introduction of new Purchase Terms that specifically address modern slavery issues.  Harvest Road Group has commenced the process of reviewing the role of SAQ's and centralising the system as part of new supplier screening and introducing a streamlined supplier onboarding process.
<b>Supplier Engagement, Corrective Action and Remedy</b>	Improve identification of corrective action and remedy.	Conduct audits on a selection of our Tier Two suppliers.  Based on recommendations, adopt a hybrid model for audits, including role of worker voice.	In progress: No in-person auditing occurred due to COVID-19 restrictions.  Identified for expansion in next reporting period.
<b>Training and Collaboration</b>	Roll-out compulsory training on modern slavery for all staff.	Continue to improve training based on staff feedback test results.  Develop annual training refresher courses tailored to specific staff (e.g. people and culture, procurement, senior management).	In progress: Compulsory modern slavery training is provided to all new staff.  This action item has been placed on HRG Modern Slavery Working Group to update and is a feature of the action plan for FY23.

# Future Commitments

We remain committed to a modern slavery response that is constantly evolving, continually improving and responsive to areas of concern or priority as they arise. We also recognise the importance of setting a clear roadmap for planned future actions for the upcoming reporting period.

We have identified the following as priority areas to focus on in the next reporting period:

AREA OF FOCUS	PLANNED ACTION FOR NEXT REPORTING PERIOD (FY22–23)
<b>Risk Assessment</b>	Undertake quarterly modern slavery audits on the recruitment process on at least ten migrant workers at our beef processing facility in Harvey.
<b>Training and Collaboration</b>	Provide an updated refresher of modern slavery training to all employees.
<b>Training and Collaboration</b>	Provide ongoing quarterly modern slavery activities for employees, including e-comms training and posters to raise modern slavery awareness.
<b>Training and Collaboration</b>	Provide targeted training on procurement and new supplier processes.
<b>Training and Collaboration</b>	Providing an internal intranet with links to modern slavery procedures.
<b>Training and Collaboration</b>	Provide a presentation to all staff at internal "Long Table" meetings to raise modern slavery awareness.
<b>Governance</b>	Enhance the supplier screening process, with a focus on uniformity. Upgrade the overall process of issuing supplier self-assessment questionnaires to all new suppliers through a centralised system.
<b>Supplier Engagement, Corrective Action and Remedy</b>	Continue to review and conduct due diligence of solar panel suppliers as part of planned procurement projects.
<b>Governance</b>	Scoping possibility of introducing modern slavery specific provisions to our current grievance mechanism.
<b>Governance</b>	Develop Harvest Road Group's own Supplier Code of Conduct. Currently we have adopted Tattarang's Supplier Code of Conduct.

# 8. CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

Consultation with all Harvest Road Group owned and controlled entities has occurred in the preparation of this Statement, as well as in relation to our overall modern slavery response across the reporting period.

Harvest Road Group's Head of ESG has engaged with representatives across Harvest Road Group's business operations to review and support actions against modern slavery. All entities within Harvest Road Group undertake the same risk assessment and due diligence processes described throughout this Statement and have been subject to the proprietary risk assessment, detailed further on page 11.





# HARVEST

— ROAD —

[www.harvestroad.com](http://www.harvestroad.com)

+61 8 9335 1244

[info@harvestroad.com](mailto:info@harvestroad.com)