



# MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2023-2024





# MODERN SLAVERY STATEMENT

**D'Orsogna Limited (ACN 063 427 752)**

**Financial Year 2023-2024**

This Modern Slavery Statement is prepared and issued by D'Orsogna Limited, ACN 063 427 752 (herein after referred to as D'Orsogna) and is made pursuant to the Modern Slavery Act 2018 (Cth) in respect of D'Orsogna Limited and refers to the period 1 July 2023 to 30 June 2024.

This is D'Orsogna's fifth Modern Slavery Statement and has been prepared to address the seven mandatory content criteria outlined in the Act.

## MESSAGE FROM THE MANAGING DIRECTOR

D'Orsogna Ltd is committed to operating responsibly and establishing and adhering to high ethical and social standards. We reject any activities which may cause or contribute to modern slavery, including forced or bonded labour, child labour, human trafficking, slavery, servitude, forced marriage or deceptive recruiting for labour or services.

D'Orsogna Limited recognises modern slavery affects many people across the globe and we are not immune to these risks within our supply chain. During the reporting period D'Orsogna Limited continued to evolve its maturity to address modern slavery risk in FY 2024.

D'Orsogna Limited's approach to identifying and managing the risk of modern slavery is guided by our commitment to compliance and respect for human rights across our operations and supply chain. In our fifth annual Modern Slavery Statement, we are pleased to be able to report progress across the key areas by improving business practices, including stakeholder engagement, monitoring, and human rights risk assessment.

During the period, D'Orsogna Limited has continued to improve our compliance framework and risk management processes which includes partnering with suppliers and business partners who share our values of meeting human rights obligations and who oppose to all forms of slavery and forced labour in its operations and the operations of its suppliers.

We recognise that we need to continue to make improvements to ensure that we continue to work towards eliminating modern slavery risks within our business and to meet Australian Modern Slavery Act obligations.

We will continue to take a risk-to-people approach, and this statement provides an overview of our ongoing efforts and our commitment to improvement.

**Jason Craig**

Managing Director and Chief Executive Officer

28 December 2024

# MODERN SLAVERY ACT 2018 COMPLIANCE

## About our operations

Founded in 1949, D'Orsogna Ltd is an Australian owned and operated food manufacturing company employing a culturally diverse group of over 800 people in two states, Western Australia (Head Office) and Victoria. D'Orsogna's core business is providing a range of processed ham, bacon and smallgoods across Australia that includes the largest retailers in the country.



## Structure



## Our Mission Statement

*"With a proud history and heritage, D'Orsogna is committed to excellence in all we do, from the food we produce to our relationships with employees, customers, partners, consumers and shareholders.*

*We achieve this through the highest levels of Safety, Quality, Innovation, Respect and Integrity."*

These core values are communicated, actively promoted and monitored throughout our business and in our business relationships with our suppliers and customers.

During the reporting period D'Orsogna continued to engage with businesses of goods and services that have a similar value system and business ethic, which includes respect of human rights and sustainable business practices. D'Orsogna recognises that as a large purchaser of goods and services, the values and ethical practices of its suppliers can have a significant impact on our performance and reputation within the communities in which we operate.

## Key policies and principles to manage modern slavery risks

We are ensuring we stay informed of proposed amendments to the Modern Slavery Act including any additional measures required to address modern slavery issues in Australia and overseas and annual reporting requirements.

We are committed to continuously improving our approach to improving responsible sourcing practices and compliance within our operations. An Audit and Risk Management Committee was established during the year and it meets regularly to review risk, controls and compliance within the business. The Committee includes members of the governing body.

D'Orsogna recognises that risks do exist within our supply chain and will vary depending on the industry and geographic location of our suppliers. The procurement policy is supported by a Supplier Code of Conduct, and Quality Assurance program that measures supplier performance, however we recognise that continued improvement is required in the monitoring of compliance in relation to supplier selection and compliance within all our business operations.

## Key policies and principles to manage modern slavery risks

The below policies, procedures and compliance processes were reviewed during the reporting period.

Policies, Procedures & Processes	Undertaken
Ethical Conduct & Sourcing Policy	● ●
Procurement Policy	● ●
Preferred & Approved Vendor SOP Register	● ●
Risk Management Policy	● ●
Whistle Blower Policy	● ●
Employee Code of Conduct	● ●
Employment Policy <i>which includes labour hire management</i>	● ●
Grievance Policy	● ●
Vendor Contracts renewal includes reference to ethical practices	● ●
Business Partner Requirements include reference to modern slavery compliance	● ●
Supplier Code of Conduct – Established during the reporting period	● ●
Modern Slavery App – Online reporting tool to improve risk assessments and data collation	●
● Updated ● Re-communicated ● In progress new	



## Modern Slavery Act 2018 Compliance Methodology

D'Orsogna continued its journey and recognises that through its own operations or supply chain it can be directly or indirectly exposed to the risk of modern slavery including human trafficking.

We believe that the involvement of our Senior Management Team and the Board of Directors is fundamental to the ultimate success in the implementation of the *Modern Slavery Act of 2018* by “leading from the top down”. Modern slavery risks and compliance with Modern Slavery Act are incorporated into our business risk matrix.

### Internal Operations – Risk Assessment

Our priority are our employees and in the 2024 reporting period D'Orsogna continued to review the risks of modern slavery within our operations as we employ a diverse employee group. During the reporting period we conducted an internal audit on our employment practices and grievance reports to identify any modern slavery issues within our operations.

### Internal operations – Modern Slavery Risk Rating is LOW

The risk within our internal operations was assessed as being low which we are proud of.

The modern slavery risk was assessed as low due to the following factors:

- Dedicated Human Resources Department led by the HR Manager who is part of the Senior Executive Team and provides the governing body a monthly report.
- Human resources controls and processes in place, including:
  - Whistle Blower Policy which includes anonymous reporting to third party
  - Inductions and on-boarding of new employees which includes providing mandatory information required under the Fair Work Act.
  - Compliance auditing in relation to ensuring our employees all have work rights, old enough to work and working at D'Orsogna Ltd at their own free will.
  - Employees have access to unions that attend sites, consultation and grievance raising mechanisms.
  - The requirement to meet compliance with Australian Employment laws is externally audited to ensure we meet compliance and employment standards.
  - Robust Safety and Health system in place to ensure the health and welfare of our employees which includes consultation and grievance procedures in relation to safety and health within our operations.
  - Access to anonymous internal grievance reporting tools easily available via apps and surveys.
  - SMETA (Sedex Members Ethical Trade Audits) are conducted regularly by a third party
  - Consultation with our employees and employee relations

## Supply Chain – Modern Slavery Risk Assessment

D'Orsogna continued its journey on assessing our supply chain within its operations to identify any modern slavery issues.

### Actions Taken.

- Reviewed the current vendor list to identify any new risks based on their operating location and primary business
- Reviewed current procedures and protocols to identify gaps in the current compliance program
- Conducted a review of vendors on the current preferred vendor list to identify potential modern slavery risks and updated key contact information.
- Conducted a review on actual spend for the reporting period by supplier, then ranked our suppliers from highest to lowest spend.
- Issued modern slavery questionnaires to new or proposed vendors. The process includes having the supplier to advise of any other third party suppliers within their supply chain.
- Updated the Supplier Risk Register and Preferred Vendor Register to be current and identified the current supply chain risks in regard to modern slavery.
- Monitored any news/announcements in relation to our vendors on any ethical issues being reported.
- Improved supplier contract review process to ensure that relevant clauses with respect to human rights and relevant measures against modern slavery were included in the supplier's obligations.
- Reviewed risk assessment criteria to ensure it was current.
- Consultation with suppliers

## Supply Chain – Location of Suppliers – Risk Assessment and exposure to modern slavery issues within supply chain.

On review of data for the reporting period, most of D'Orsogna's direct supply chain spend continues to be with meat suppliers, who are located in Western Europe, Australia and America (Tier 1 supplier), followed by packaging and dry goods materials spend (Tier 2 supplier) some of which is sourced from China. China has a **higher risk** of modern slavery when reviewing The Global Slavery Index during the reporting period. The majority of suppliers country of origin were **low risk**.

Tier 1: High Spend \$	Tier 2: Medium Spend \$	Tier 3: Lower Spend \$
Raw meat procurement	Dry Goods	Information, technology & Communications
	Packaging	Maintenance services and parts
		Security services
		Logistic
		Office and medical supplies
		Personal protective clothing/protective equipment

Due to some major suppliers being located overseas in a high-risk location we recognise that risks do exist within our supply chain that need further action, controls and transparency are required to improve modern slavery risks within our operations.

## RISKS OF MODERN SLAVERY PRACTICES IN D'ORSOGNA'S OPERATIONS AND SUPPLY CHAINS

### Effectiveness of actions taken

The Modern Slavery program is still a work in progress as not all modern slavery risks have been eliminated as identified in our supply chain assessment.

During this reporting period, our focus was to continue our journey on a better understanding of our modern slavery risks and how these risks may present in our operations and supply chains.

D'orsogna Limited participates in auditing activities (SMETA) by a third party in relation to compliance with the Ethical Sourcing Initiative Code. The audit includes reviewing our processes and procedures in relation to modern slavery within our internal operations but also on how we apply the requirements to our suppliers and their effectiveness.

On review for the current reporting period we have confirmed that we have some good controls from past actions implemented to improve the program, however we continue to have some gaps in our supply chain. We will need to further improve on our review and assessment process of suppliers to allow us to adequately assess the full effectiveness of the measures we have implemented and undertaken. Improved assessment tools are required and improved transparency on our supplier engagement of third parties.

We are in the 5th year of the implementation of the *Modern Slavery Act of 2018* and we recognise that our review and assessment process have limitations in identifying and addressing all of our modern slavery risks within our operations and across our supply chain as some of our major suppliers are located overseas. It is a challenge to gain true transparency unless the facilities are physically visited.

A key challenge in addressing the risks identified remains the ability to source alternate suitable suppliers to be able to produce what is needed to run our operations when they do not comply with supplier requirements.

### Remediation and monitoring

Where a legitimate modern slavery concern or issue is raised, through one of our grievance mechanisms, we are committed to work with our suppliers, Government and worker representative bodies to ensure an appropriate remedy is provided.

### Our grievance mechanisms

We respect the rights of individuals therefore to support this we provide a number of grievance mechanisms:

#### A. Whistle Blower Policy

Our Whistle Blower Policy encourages the reporting of any suspected unethical, illegal, fraudulent or undesirable conduct, including suspected adverse impacts on people, communities or the environment within our supply chain. The Whistle Blower Policy includes a website link and external hotline number managed by an external contractor, Your Call, who monitor and provide quarterly reports.

#### B. Internal Grievance Procedures

The company has an internal Human Resources Department and a documented grievance procedure. We communicate this grievance procedure through inductions, re-fresher inductions and visible printed copies

on noticeboards and via the company intranet. The procedure includes the process of accessing union support, government bodies such as Fair Work Australia if the remedy is found to be unsatisfactory for employment related issues or Worksafe Australia in the case of safety related grievances.

### C. SMETA Audits

The audit process includes interviewing employees without the presence of management in relation to labor standards and health and safety.

## FUTURE ACTIONS TO BE TAKEN TO ADDRESS MODERN SLAVERY RISKS

In order to reduce the risks and achieve improved compliance with the Act, the company will be taking the following actions.

- Continue to further develop and improve on D'Orsogna's Preferred Vendor Program which is monitored through our Quality Management System to manage risk within our supply chain relationships.
- Review and amend key policies including the Ethical Conduct/Sourcing Policy and the Procurement Policy to improve on our risk management processes.
- Improve our risk assessment tools and methods to include better methods of assessing overseas suppliers.
- Assess a technology-based system to improve collation of information, analytics and risk assessment processes.
- Risk Management reporting to the governing body via the Audit and Risk Management Committee. These risks will be discussed and addressed at a designated business risk committee with Board Member overview and periodically at Management and Board meetings.
- Promote more awareness of the ETI code (Ethical Trade Initiative) within our operations and supply chains.
- Improve documented process on dealing with any identified Modern Slavery matter within our operations
- Team members who deal with our suppliers will be required to complete training programs that will cover modern slavery and ethical sourcing via professional body if not yet completed.
- Review of Supplier Contracts to ensure that suppliers meet the supplier code of conduct.
- Undertake refresher Training Program on modern slavery risks and new Sedex platform
- Continue with information collation and risk assessment process via improved system.
- Investigate the use of third parties, such as SEDEX, Modern Slavery platforms or applications to assist with data collation and compliance to our procedures for all suppliers including those that are overseas.
- Provide staff education on key employment rights and minimum conditions.
- Continue with internal auditing processes.
- Provide training programs on employment related policies and procedures for our management team.
- Continue to participate in SMETA audits and promptly resolve issues requiring corrective actions.

This Modern Slavery Statement is made on behalf of D'Orsogna Limited for the financial year ending 30 June 2024. This Modern Slavery Statement was approved by the Board of Directors

*This Modern Slavery Statement is prepared in accordance with the criteria set out in the Modern Slavery Act 2018 (Cth).*