



Modern Slavery Statement FY2024

Hellers Group Holdings Limited

Mandatory criteria	Section
1. Identify the reporting entity.	Introduction
2. Describe the reporting entity's structure, operations and supply chains.	About Hellers
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Understanding our risks
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Hellers' actions and to assess and address modern slavery
5. Describe how the reporting entity assesses the effectiveness of these actions.	Effectiveness of our actions
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Consultation
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Throughout Statement

This is Hellers Group Holdings Limited's (Hellers Group) Modern Slavery Statement for the financial period ending 30 June 2024. It is our third Modern Slavery Statement.

This Statement was prepared in accordance with the *Modern Slavery Act 2018* (Cth), Australia (the Act). As Hellers Group takes a whole of organisation approach, this report identifies the steps taken by Hellers Group (Hellers Group Holdings Limited, New Zealand, and its controlled entities, including those carrying out business in Australia) to assess and address modern slavery risks in our operations and supply chain. Our structure is explained in the "About Hellers" section.

Reporting entity

This Statement is a Joint Statement pursuant to section 14(1) of the Act, made by Hellers Group Holdings Limited on behalf of HLRS HoldCo Pty Ltd, HLRS BidCo Pty Ltd and Hellers Australia Pty Limited (collectively referred to as Hellers Australia). The reporting entities covered by this Statement are:

- HLRS HoldCo Pty Ltd (holding company, ABN 32 628 433 134)
- HLRS BidCo Pty Ltd (holding company, ABN 37 628 177 266)
- Hellers Australia Pty Limited (trading company, ABN 17 627 366 750)

This Statement also covers risks and actions in relation to the New Zealand trading entity, Hellers Limited (Hellers NZ), which is not a reporting entity for the purposes of the Act. References to "our" and "we" in this Statement are references to Hellers Group, including the reporting entities (above) and Hellers NZ. The approach and associated policies and procedures for managing modern slavery are consistent across Hellers Group.



Chief Financial Officer's Message

Hellers is now entering our third reporting period under the Australian *Modern Slavery Act 2018* (Cth) and we are making progress in meeting the goals set out in our Modern Slavery Action Plan 2021. We understand that modern slavery is a complex, global problem which is relevant across our entire value chain. Hellers undertakes to continue to do their part in respecting internationally recognised human rights, such as the right to be free from forced labour and other forms of modern slavery, through working with our staff and our suppliers to raise awareness and protect people, and continuing to implement the actions in our Modern Slavery Action Plan. Our approach is also guided by the International Bill of Human Rights, the International Labour Organisation's (ILO) core conventions, and the UN Guiding Principles on Business and Human Rights (UNGPs).

Hellers are committed to addressing our modern slavery impacts and risks and we have continued to take action to strengthen our approach. This year, we rolled out our updated supplier self-assessment questionnaires (SAQ) to understand suppliers' current practices and identify areas of concern, updated our escalation process for responding to SAQs that raise possible red flags, held an SAQ and escalation training for internal users of the process, conducted organisation-wide modern slavery awareness training and also further embedded and ran an awareness raising campaign about our whistleblower mechanism.

We will continue to focus on progressing our programs to address modern slavery risk in our operations and supply chain and achieving the goals set out in our Modern Slavery Action Plan.

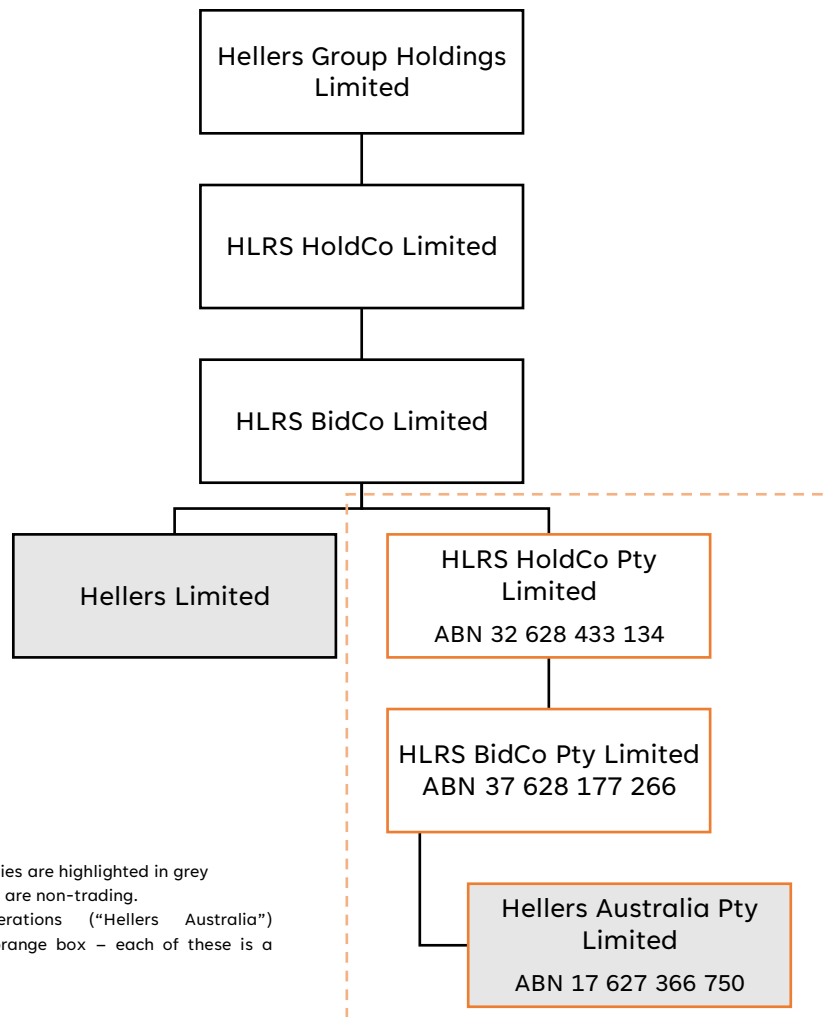
Kim Dorling, CFO



About Hellers

Hellers Limited (Hellers NZ) and Hellers Australia Pty Limited (Hellers Australia) are the trading entities of the Hellers Group Holdings Limited (Hellers Group). Hellers Limited operates in New Zealand, and Hellers Australia operates in Australia. Hellers Group is headquartered in Christchurch, New Zealand. For completeness and compliance with the Act, where our structure, operations and supply chain have remained the same since the last reporting period, we have re-stated the same information in this Statement.

Structure of Hellers Group



Key

- Trading companies are highlighted in grey
- All other entities are non-trading.
- Australian operations ("Hellers Australia") highlighted in orange box – each of these is a reporting entity

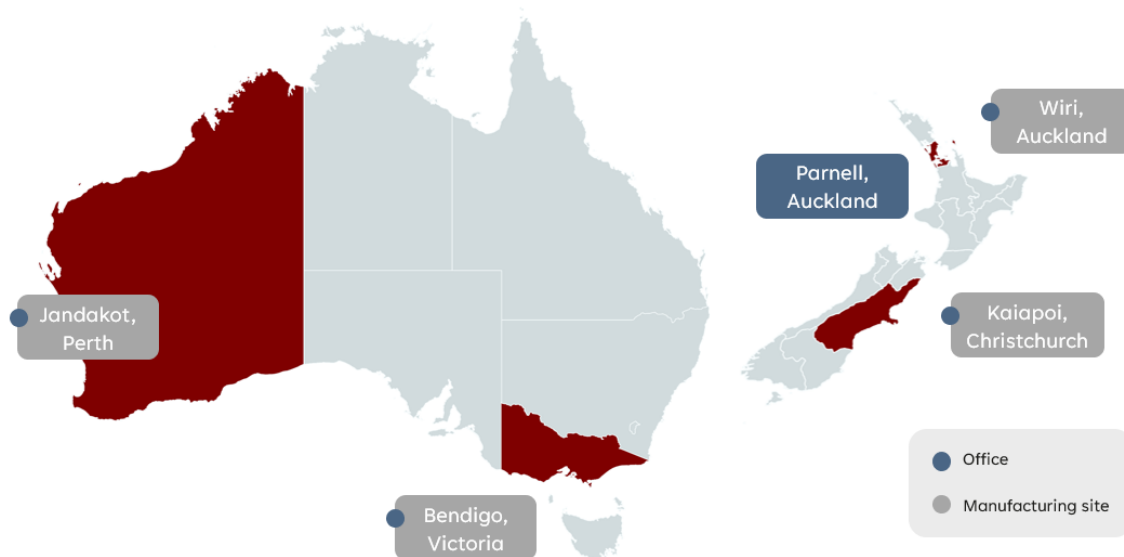


Hellers NZ is New Zealand’s leading smallgoods manufacturer producing a range of bacon, ham and smallgoods products sold to retail, foodservice, industrial, Quick Service Restaurant, and export customers. Hellers NZ has two manufacturing sites – Kaiapoi, Christchurch and Wiri, Auckland. Hellers NZ purchases meat and ingredients from local and international suppliers. In FY2024, Hellers NZ purchased NZD \$127m of meat and ingredients from 71 suppliers.

Hellers Australia produces a range of further processed and ready to eat products from chicken and other meat products, sold to retail, foodservice and industrial customers. Hellers Australia has two manufacturing sites – Bendigo, Victoria and Jandakot, Perth. In FY2024, Hellers Australia purchased AUD \$78m of meat and ingredients from 87 local suppliers who may import components of the ingredients.

In FY2024, Hellers Group employed over 900 people across New Zealand and Australia, including direct hire permanent and casuals, and indirect hire temporary agency staff.

Hellers Group site map



We outline key features of our operations and supply chain below.

A1. Own Operations

Direct employment of workers

- Hellers Group employs over 600 people in New Zealand and more than 330 in Australia, including direct hire permanent and casuals, and temporary agency staff.
- Temporary agency staff are used on an adhoc basis as required and are typically 0-10 in New Zealand, 0-10 in Jandakot, and 10 – 20 in Bendigo. Hellers has mostly transitioned away from the use of labour hire staff at all our facilities.



The provision and delivery of products or services	<ul style="list-style-type: none"> • Hellere NZ manufactures and distributes bacon, ham and smallgoods in NZ. • Hellere Australia manufactures and distributes ready to heat and ready to eat poultry and other meat products. • Hellere Group currently has four manufacturing sites across Christchurch and Auckland, New Zealand; Jandakot, Western Australia; and Bendigo, Victoria, Australia. • There are office-based staff working from Kaiapoi (Christchurch), Wiri (Auckland), Parnell (Auckland), and from the Bendigo and Jandakot sites.
Financial Investments	<ul style="list-style-type: none"> • Hellere Group is structured as listed above and holds no external investments outside of the Hellere network. • Hellere Group's largest investor is Adamantem Capital.

A2. Supply Chain

Products provided to the entity by suppliers	<ul style="list-style-type: none"> • Products purchased by Hellere Group includes but is not limited to: meat products (e.g. pork, poultry, beef, fish) non-meat ingredients (e.g. blends, starches, coatings, salt, oil, casings), packaging (e.g., labels, cartons, trays, film), and capital machinery (e.g. manufacturing equipment, safety barriers). • Hellere Group's most significant supplier spend is within Australia, New Zealand along with the purchase of imported goods from Asia, Europe, and North America.
Services provided by suppliers	<ul style="list-style-type: none"> • Services provided by freight, warehousing, professional services, cleaning services, software, waste disposal, insurance, marketing, maintenance (pest control), labour services (including temporary workers for factory and warehouse) and utilities.
Products and services used by indirect suppliers in Hellere Group's supply chain	<ul style="list-style-type: none"> • An example of products and services used by suppliers includes grain purchased for poultry and pigs.

Hellere sourcing locations by category

	Hellere Australia	Hellere New Zealand
Meat	Locally supplied chicken, turkey and beef.	Combination of imported and local pork, local chicken, local beef, local lamb and local venison. Imported pork is sourced from Poland, Denmark, Spain, Germany, Canada, and the US.
Ingredients	All ingredients are purchased locally and are made from both local and imported ingredients.	Ingredients are sourced both locally and direct from Asia and Europe



	Imported ingredients are sourced from Thailand and China.	
Packaging	Sourced locally in Australia and from Asian Hazard Analysis and Critical Control Point System (HACCP)/ISO 22000 accredited suppliers.	Sourced locally and from Asia and Europe from HACCP/ISO 22000 accredited suppliers.

Understanding our risks

Modern slavery

Modern slavery refers to extreme forms of labour exploitation. It describes situations where coercion, threats, or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery is an umbrella term that captures a spectrum of exploitation ranging from deceptive working practices, forced marriage, forced labour, and the worst forms of child labour to human trafficking, slavery and servitude.

Forced labour in particular is a significant problem in the Asia-Pacific area. It refers to work or service that any person is compelled to perform under the threat of any penalty and for which they have not offered themselves voluntarily (according to the ILO definition) According to the latest estimates from the International Labour Organisation (ILO), more than 50 million people globally live in modern slavery – of which, forced labour accounts for 27.6 million and 22 million are in forced marriages. More than half of all forced labour – so more than 13.8 million people – are in forced labour in upper-middle or high-income countries, and 17.6 million people in forced labour are exploited in the private sector. This is why it is important for business to focus on forced labour.

The ILO estimates that the prevalence of modern slavery has risen in the last five years, with the rate of forced labour growing from 3.4 to 3.5 per thousand people in the world.¹

We are guided by the definition of risk as per the Act, which considers modern slavery risk in terms of “risk to people” of experiencing harm rather than “risk to business”. We recognise that we may cause, contribute or be linked to modern slavery risks as a result of our business activities and relationships, as set out in the UN Guiding Principles on Business and Human Rights (UNGPs) ‘continuum of involvement’.²

We are aware that Hellers Group operates in an industry (agriculture, and specifically the meat industry) that is considered by reputable sources to be relatively high risk for modern slavery.³ These industries, including in Australia, include workers who may be more vulnerable to experiencing conditions of unfair recruitment practices and labour practices or modern slavery. Agriculture and meat industry workers are documented as vulnerable to, among others, trafficking, debt bondage and deceptive recruitment. They may experience gruelling working

¹ Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, ILO 2022
www.ilo.org/global/topics/forced-labour/publications/WCMS_854733/lang--en/index.htm

² ‘Guiding Principles on Business and Human Rights’, UN Human Rights Office of the High Commissioner 2011,
www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

³ ‘Food for Thought: The Modern Slavery Act’s Impact in Fresh Food Retail, Wholesale and Agriculture’, Norton Rose Fulbright 2017 www.nortonrosefulbright.com/en/knowledge/publications/9cb18e6c/food-for-thought-the-modern-slavery-acts-impact-in-fresh-food-retail-wholesale-and-agriculture



and living conditions, intimidation, and wage theft.⁴ Additionally, the Agriculture and Meat industries are reliant on migrant labour, including through programs such as the Pacific Australia Labour Mobility (PALM) scheme. Workers are vulnerable to exploitation through rogue operators participating in these programs and systemic factors that increase their vulnerability.⁵

Risk Assessment

Hellers conducted an initial comprehensive assessment of their modern slavery risk in 2021. For our previous FY2023 modern slavery statement, Hellers engaged an external professional services firm with human rights expertise to conduct a refreshed modern slavery risk scan. The 2023 risk scan found no significant changes to the Hellers Group supplier base, therefore our overall modern slavery risk exposure was considered not to have changed significantly relative to 2021.

In the year to June 2024, Hellers Group’s operations, activities, and supplier relationships have not changed materially, and accordingly we are assuming a similar modern slavery risk profile.

The risk scan provided a snapshot of Hellers Group’s risks of modern slavery in our own operations and supply chain. The scan reviewed FY2023 (July 2022 to June 2023) spend data equal to approximately 80 per cent of Hellers Group’s total spend to identify categories with documented inherent risk of modern slavery based on key research inputs.⁶ We note that the inherent risk of an industry provides insight into potential risks but does not indicate that modern slavery has been identified in Heller’s supply chain.

Through this scan, we identified six high risk categories, including:

Risk categories	Risk factors
Meat processing and ingredients	<ul style="list-style-type: none"> • Prevalence of migrant workers, a vulnerable group • Insecure work, day labourers, casuals, and subcontractors – indicating potential for less worker visibility and increased risk of worker exploitation and forced labour
Cleaning services	
Contracting and labour hire	<ul style="list-style-type: none"> • Workers emanating from Palm Scheme visa programs, creating heightened vulnerability to exploitation • Health and safety concerns present, including poor or dangerous working conditions • Materials risk – manufacturing industry and geographies where manufacturing may be located has a higher risk of forced labour practices
Construction, repairs and maintenance	
Freight	<ul style="list-style-type: none"> • Logistics and shipping industry are a noted area of modern slavery risk – due to presence of vulnerable workers, isolation, and inadequate health and safety standards

⁴ Murky Waters: A Qualitative Assessment of Modern Slavery in The Pacific Region. Walk Free, 2020. www.walkfree.org/reports/murky-waters

⁵ ‘Australia is bringing migrant workers back’, Australian Human Rights Institute 2023 www.humanrights.unsw.edu.au/research/commentary/australia-migrant-workers-exploitation-rampant

⁶ These inputs include WalkFree’s Global Slavery Index, International Trade Union Confederation’s (ITUC) Global Rights Index, and the United States State Department’s Trafficking in Persons Report, among other externally produced modern slavery and human rights indexes and research reports.



Packaging and equipment

- Manufacturing is considered to be a high-risk industry for modern slavery, and international manufacturing hubs have higher prevalence of forced labour practices

Our initial assumption is that we likely "cause" or "contribute" to the risks that exist in meat processing. We may potentially "contribute" to risks in certain key input categories. We are likely "directly linked" to a range of supply chain risks as set out on the following pages. We intend to conduct a more complete analysis of our relationship to the identified risks using the UNGP Continuum of Involvement in the next reporting period.

This risk scan has helped us to identify and prioritise spend categories with the highest potential risk of modern slavery. This will allow us to conduct further due diligence, for example, Hellers issues Supplier Assessment Questionnaires (SAQs) to the high-risk suppliers (meat, ingredient and freight suppliers).

Operations

Hellers Group's operations sit across New Zealand and Australia. These countries are noted in the Global Slavery Index (GSI) as lower risk countries for modern slavery. The most recent GSI data estimate 1.6 per thousand people living in modern slavery for both Australia and New Zealand.⁷ These estimates have increased significantly since the last GSI estimates in 2018, with Australia's estimate rising by 26,000 people.⁸ This data highlights the importance of undertaking regular evidence-based assessments to ascertain our impact on workers and communities.

In New Zealand, forced labour exploitation has been reported in labour intensive industries such as agriculture, dairy, horticulture, and domestic service industries.⁹ Similarly, in Australia, forced labour predominantly occurs in agriculture, domestic work, meat processing, and food services – many industries that rely on migrant workers.¹⁰

Hellers Group operates in and has business activities and relationships with several higher risk industries, including agriculture, meat processing, labour agencies, property management services including cleaning and maintenance, logistics and shipping.

Our employee management and document check procedures have not changed significantly since our last statement. Hellers Group ensures all directly employed workers are provided with a written contract in English with clear terms of employment including wage rates and

⁷ See Australia and New Zealand country studies available at walkfree.org. Australia's estimated number of people living in modern slavery is 41,000, and New Zealand's estimated number of people living in modern slavery is 8,000, which equals the same number of people living in modern slavery per thousand. Walk Free 2023, www.walkfree.org/global-slavery-index

⁸ GSI 2018 Australia data estimates absolute number of victims of 15,000. Walk Free 2018 www.walkfree.org/global-slavery-index

⁹ New Zealand country study, Walk Free 2023 www.walkfree.org/global-slavery-index/country-studies/new-zealand

¹⁰ Australia country study, Walk Free 2023 www.walkfree.org/global-slavery-index/country-studies/australia



hours of work. We undertake different degrees of document checks of workers throughout the business, including proof of age. We undertake these checks to confirm workers are allowed to work according to legal standards and applicable organisational policies.

Labour Hire

One of the biggest modern slavery risks around labour and recruitment is the use of third-party labour hire contractors. The labour hire workforce tends to comprise low skill workers, migrant workers, and temporary or seasonal workers, all of whom are more at risk of exploitation due to the presence of one or more vulnerable characteristics.

Additionally, the labour hire sector remains unregulated at a federal level, although Victoria introduced legislation requiring labour hire providers to be licensed, among other controls. The presence of these risk factors overlay to mean that risks such as recruitment fees, unpaid overtime and exploitation of workers are likely to be undetected. Labour hire is of growing concern in Australia due to the reliance of certain sectors on this workforce, notably, horticulture and agriculture.

Labour hire providers (LHPs) have the same obligations under Australian law as any other business. While many LHPs do the right thing and operate lawfully, numerous reports have shown that some LHPs are breaching their employer obligations and denying workers their lawful entitlements. The Migrant Workers' Taskforce, for example, cited instances of wage underpayment and non-payment of superannuation, not remitting PAYG tax and workers' compensation premiums, sham contracting, unlawful deductions, substandard and overpriced accommodation, and illegal phoenixing.

Hellers Group uses labour agencies and sub-contractors to provide workers. We have standard contracts in place with labour agencies that outline our expectations around eligibility to work, pay rates, and required skills and training or certifications. In New Zealand, labour hire agencies are required to sign on to Terms and Conditions which address worker protections, including accuracy of hours recorded to hours worked and excessive working hours.

In Australia we have been working towards reducing our reliance on labour hire agencies and recruiting employees directly to give us greater control over employment conditions. We have made good progress in this transition, with labour hire now generally only used at our Bendigo site in Australia. Our Bendigo labour hire reduced from 55% to under 15% of the workforce during the 12 months to June 2024. For our remaining labour hire supplier partners we have written agreements in place which provide transparency over pay and have reviewed their modern slavery policies. We ensure all documents for direct employees are filtered through internal and government checks, including proof of age, right to work and ATO checks.

Supply chain

We recognise there are heightened modern slavery risks in our supply chain due to our industry and the nature and locations of our suppliers and the composition of their workforce.



According to the GSI, the Asia Pacific region hosts the largest number of people in modern slavery, at an estimate of 15 million people in forced labour.¹¹ The impacts of the COVID-19 pandemic and climate change have exacerbated vulnerability across the region and driven more people to migrate in search for work.

While Australia and New Zealand are considered to be lower risk for modern slavery, we recognise that the business activities and relationships we carry out are in areas with relatively higher risk profile for labour exploitation – such as domestic agriculture – and therefore elevate our overall modern slavery risk. This is primarily due to the presence of migrant labour, complex subcontracting arrangements, involvement of international recruitment agencies, and the risk of isolation and physically demanding work.

We continue to monitor supply chain modern slavery risks and impacts. Refer to next section ‘Hellers’ actions to assess and address modern slavery’ for information on how we conduct this.

Hellers’ actions to assess and address modern slavery

Key actions taken in the reporting period

Hellers continues to progress against our Modern Slavery Action Plan. In the reporting period, we have:

- Rolled out the Supplier SAQ which had been updated to include additional detailed modern slavery, animal welfare and ESG considerations
- Consolidated / standardised the approach to SAQs across Australian and New Zealand operations
- Updated the responsible sourcing escalation process to define red flags and responses that would warrant escalation for further due diligence
- Established the responsible sourcing escalation process
- Conducted training for key internal users of the SAQ and responsible sourcing escalation process
- Held all staff training on modern slavery including what it is, how to spot it
- Awareness raising campaign with internal stakeholders on whistleblower mechanism
- Enhanced due diligence on labour providers by requiring written terms and conditions with all labour hire agencies including transparency of pay rates
- Reduced our reliance on labour hire agencies, particularly in Australia, by recruiting more staff directly. During the year labour hire reduced from 55% to under 15% of our Bendigo workforce. Labour hire is now generally only used at one of our sites (Bendigo)

Enhanced due diligence and audit

In FY2024 a SMETA audit was conducted at our Bendigo site. Hellers had taken the recommended corrective actions identified in earlier audits and as a result all non-compliances were closed. This includes actions in relation to ensuring working hours are not

¹¹ Asia and the Pacific, Walk Free 2023 www.walkfree.org/global-slavery-index/findings/regional-findings/asia-and-the-pacific



excessive, establishing young labour protections, and having in place effective systems to keep up with legislative requirements.

The next audit will be conducted in two years time.

Our Jandakot site in Western Australia is scheduled to have their next SMETA audit in late 2024.

We have made further updates to our supplier SAQ which we detail below.

Supplier self-assessment questionnaire and responsible sourcing escalation process update

We updated our supplier self-assessment questionnaire this year, which has been issued to 25 suppliers as of 1 July 2024. All of the 25 suppliers who received the SAQ were identified as high risk during our 2023 risk assessment. The 25 include 3 new suppliers and 22 existing suppliers as part of the recontracting process. Of the 25, nine are meat suppliers, five are packaging suppliers, and ten are ingredient/seasoning suppliers. The SAQ is issued during the recontracting process for existing suppliers, and during onboarding for new suppliers. We issued to the SAQ to this cohort first, reflecting their higher risk profile, in order to improve our understanding of their modern slavery risks and management controls, ESG measures and animal welfare policies (where applicable). Our intention is to roll out the SAQ to all our raw material and freight suppliers across Australia and New Zealand over the next 24 months.

Our SAQ process has now been consolidated across our Australian and New Zealand operations, so that all Helliers Group suppliers receive the same standardised questionnaire to complete irrespective of their location.

With support from an external professional services firm, we finalised our responsible sourcing escalation process to define the 'red flag' findings from SAQ responses that would warrant escalation of a supplier for further due diligence and the appropriate escalation action. The 'red flag' indicators defined were in relation to poor labour practices and heightened risk of conditions of modern slavery that may lead to negative human rights impacts on workers within Helliers' supply chain. For example, where a supplier responds in their SAQ that they do not currently record workplace injury rates, the appropriate escalation would be to add a contract clause requiring supplier to implement and embed an incident record or a WH&S management system. The aim of this exercise is to ensure we can actively recognise risk areas within SAQ responses and take appropriate mitigating actions.

As of 30 July 2024, 19 SAQ responses had been received and 6 have started to be reviewed. Because the responses are still at the initial review stage, none has been put through our escalation pathway yet.

Alongside the new SAQ questions, we have developed internal material to support our staff to evaluate risks and controls based on supplier responses. We have also drafted a responsible sourcing escalation process for Helliers Group staff to have clear steps for escalating suppliers for further due diligence and engagement. We will work to embed this process internally in the next financial year.

Modern slavery & whistleblower policy awareness raising

In FY2024 Helliers undertook a campaign to raise our overall business awareness and understanding of modern slavery risk and how to whistle blow. We did this through



developing internal communications materials to support our staff to understand what practices should be reported and how to whistle blow along with the scope of the whistleblower policy and its application in the workplace. We also held training sessions for all staff to build their awareness of the policy. This process has now been fully embedded in the organisation. The aim of this process is to ensure existing grievance mechanisms are understood by and accessible to employees. As set out later, our whistleblower policy also allows non-employees to raise concerns. In future we will consider communication of the policy and process beyond direct staff.

During the year we held training sessions for the Procurement and Quality teams to upskill them on modern slavery, how it can be found in our supply chain and how we will be addressing it through our SAQ process.

Through these communications and training sessions we aim to prevent modern slavery in our organisation and supply chain, promote timely reporting of risks, and encourage employee contributions toward managing our risks.

No whistleblower complaints were lodged in the FY24 period.

Due Diligence approach to managing labour hire agencies

Hellers has taken several steps to improve management of the risks associated with labour hire providers. Our primary strategy has been to reduce our reliance on labour hire workers and to that end we have transitioned away from use of temporary agency workers in our New Zealand sites and Australian sites. In New Zealand we try to hire people directly wherever possible. In Jandakot and Bendigo we also now recruit directly for factory workers wherever possible with labour hire agencies being used on an exception basis.

Given we are continuing to use a few labour hire workers we have also taken steps to strengthen our oversight and management of their working conditions. In New Zealand we've created terms and conditions which we require labour hire providers to sign up to. These address worker protections, including their systems to accurately record hours worked and monitor excessive working hours. In Australia, we require labour hire providers to demonstrate that they have transparent wage payments and the administrative fee is disclosed upfront. Providers must also demonstrate that workers are paid per the applicable award rates with the admin fee added. Finally, we also review the modern slavery policies of Australian providers and offer feedback to support them to improve their management approaches.

Commitment to remedy

We recognise our responsibility to respect human rights and prevent, mitigate and remedy impacts that we may cause, contribute or be linked to. We are committed to working with suppliers to mitigate risks of modern slavery and address issues as they arise. In the event of non-conformance, we will work with the suppliers to remedy the harm caused to people and improve their processes. We would cease a relationship over egregious practices and wilful non-compliance.



Governance and risk management

Our Board is committed to addressing modern slavery risks. We strive to keep our Board and management up to date with our modern slavery actions. We have a Modern Slavery sub-committee of the Board who meet annually to review the modern slavery statement (MSS) and agree our action steps for the following year. The sub-committee report back to the full Board before approving and submitting our annual MSS. Modern slavery reporting is part of our annual board calendar. Each year prior to filing our MSS we hold a discussion at the Board level on what modern slavery is, what we are doing to address modern slavery risk, and our modern slavery-related reporting requirements. In FY2024, modern slavery was discussed at the November board meeting. Additionally, at the management level, there is greater management team awareness with Purchasing, Quality, ESG and Executive teams fully aware of our obligations to identify, address, and report on modern slavery risks and impacts.

The Chief Financial Officer has responsibility for Hellere’s overall modern slavery approach.

Policies

We have several internal policies that support our approach to identifying and addressing modern slavery risks in our operations. Our policies are reviewed periodically. None of our policies was reviewed in FY24.

These policies include:

Policy	Content
Code of Conduct	Our Code of Conduct outlines the expected values and behaviours of our business and employees.
Modern Slavery Policy	Our Modern Slavery Policy supports our commitment to contributing to ending all forms of modern slavery. This policy outlines our approach to reducing the risk of modern slavery practices within our operations and supply chain.
Whistleblower Policy	This policy outlines our whistleblower process and the protections provided to Whistleblowers should they raise a concern.
Diversity, Inclusion and Equal Employment Opportunity Policy	We are committed to an inclusive workplace that embraces and promotes diversity and inclusion. Equal employment opportunity is a fundamental principle of Hellere Group. Employment and progression is based on personal capabilities, experience, and qualifications without discrimination on the basis of every protected characteristic at law.
Corporate Social Responsibility Policy	This policy outlines our commitment to acting responsibly and ethically in all aspects of our



	business operations, including people and the environment.
Appropriate Workplace Behaviour Policy	This policy includes grievance handling information for employees who feel subjected to any form of unacceptable workplace behaviour contrary to our Appropriate Workplace Behaviour Policy.

Grievance mechanisms

We are committed to investigating whistleblower reports and protecting reporters and suspected reporters from reprisal and victimisation. Our Whistleblower Policy outlines who can make a report and what can be reported, as well as who can receive a whistleblower disclosure. The Whistleblower policy covers “illegal and unethical conduct” which allows for reporting of concerns related to modern slavery. Eligible reporters include: current and former employees (including apprentices and trainees), anyone working for Hellers Group under contract including contractors, subcontractors, labour hire companies, and their employees, and any organisation and its employees who have a business relationship or are otherwise associated with Hellers Group. People can make whistleblower disclosures to our CFO in person, via email or phone, or through our dedicated external service provider Stopleveline.

Stopleveline provides a 24/7 hotline and investigative services to Hellers Group. Workers can access Stopleveline confidentially through a number of channels, including a free call number for New Zealand and Australia, a dedicated email account, and an online portal. Stopleveline also provides updates on the status of the report and any decisions made around it. Reporters can confidentially access these updates through the platform even if they decide to remain anonymous.

Stopleveline provides expert forensic investigator support in taking calls and analysing disclosures. When Stopleveline receives a report, they provide timely reporting of incidents to dedicated representatives within Hellers.

In FY2024, we received no whistleblower reports through our Stopleveline platform. In FY2024, we worked to raise awareness of our whistleblower processes and policies to our employees and our suppliers by holding all-staff trainings regarding the use and application of the process. We also communicated with staff to ensure there was visibility of the process and how to use it.

Outside of our external whistleblower service provider, we have internal processes employees can follow to raise concerns. In FY2024, no concerns were raised in the reporting period.



Future actions & commitments

Most actions in our FY2023 Modern Slavery Statement are now complete or close to complete.

We will continue to work towards the remaining goals outlined below:

Goals	Progress
Review of current supplier onboarding processes including questionnaires	Complete – we have developed new questions around modern slavery and sustainability.
Delivery of modern slavery risk and obligations awareness sessions for management and board	Complete – organisation wide communication and training completed.
Address SMETA Corrective Action Plans at our Australia sites	Complete – closed out previous actions. Second audit completed in Bendigo. Jandakot site audit scheduled for late 2024.
Roll out of new modern slavery clauses in our cleaning contracts	Not commenced – deferred to 2025 MSS Commitments.
Develop standardised due diligence approach to managing labour hire agencies	Complete – see ‘Operations’ for detail.
Develop KPIs for modern slavery reporting	Ongoing – see following section ‘Effectiveness of our actions’ for KPIs.
Develop a Supplier Code of Conduct	Deferred to 2025 MSS Commitments. We first prioritised embedding our New SAQ process with suppliers. We will develop a Supplier Code of Conduct in future.
Embed responsible sourcing escalation process internally	Ongoing – See ‘Actions’ section for details.
Consolidate SAQs across New Zealand and Australia and start rolling out to suppliers	Complete – See ‘Actions’ section for details.
Raise awareness of Whistleblower Policy and platform with workers	Complete – See ‘Actions’ section for details.

The Act requires continuous improvement in modern slavery risk management and we are committed to this approach. Below we outline goals which we will work toward in the next (FY2025 reporting period) as we mature our approach and complete implementation of the goals set out in our FY23 Modern Slavery Action Plan.



Goal	Progress
Reduce reliance on labour hire workforce by transitioning to using directly employed workers in our Jandakot warehouse site	Underway
Conduct periodic SMETA audits at our Australia sites	Jandakot site audit scheduled for Nov
Assess Hellers' relationship to potential impacts using the UNGP Continuum of Involvement	Not yet commenced
Develop a Supplier Code of Conduct	Deferred from 2023 MSS Not yet commenced
Understand the procurement practices across different areas of business (Australia and New Zealand) for standardisation of practice across Hellers	Not yet commenced
Review SAQ findings in a category, gather learnings and apply across other categories	Not yet commenced
Receive and evaluate SAQ findings, and assign roles of Evaluation team for review of SAQ and Relationship Manager for escalation	Not yet commenced
Establish bi-annual Senior Leadership team discussions on modern slavery and what we are doing as a business to improve and enhance practices	Not yet commenced
Roll out of new modern slavery clauses in our cleaning contracts	Deferred from 2023 MSS Not yet commenced



Effectiveness of our actions

As we improve our processes to identify and address modern slavery, we will assess the effectiveness of our actions taken by developing measurable KPIs to be assessed on an annual basis.

Effectiveness measure	Outcome
# of whistleblower reports (general)	0 received in FY2024
# of suppliers issued SAQs	25 suppliers issued SAQs in FY2024
# of suppliers engaged on SAQ responses	0 suppliers engaged in FY2024

We will continue to assess suppliers through our SAQs and develop reportable metrics against this program, including how many SAQs are issued.

Another measure we use to assess the effectiveness of our modern slavery risk management actions is the number and type of reports we receive through our grievance mechanisms. Our third-party grievance mechanism Stopleveline provides us with reports based on the number of reports we receive, their themes, and their outcomes. This data helps us understand the level of awareness in our operations and supply chains of modern slavery, our Whistleblower Policy, and the platform itself. We will continue to raise awareness of our platform and process with workers and suppliers so they know when and how to raise concerns.

In addition to quantitative metrics, we recognise the importance of learning and reflection, in order to improve our approach to modern slavery. We identified in FY23 that our SAQ process required additional work to ensure that the responses received by suppliers could be adequately triaged and reviewed to identify modern slavery risk. This informed the actions taken in FY24 to improve staff understanding of modern slavery and to develop a new SAQ process that allows review of responses and escalation of red flags. In future we anticipate gathering both quantitative and qualitative data as to the number of red flags identified, and the outcome of escalation risk mitigation efforts.

We believe this better equips Hellers to not only assess modern slavery risk but also to act on the risks identified. We will continue with strengthening this approach in the coming reporting period as a key element of continuous improvement.



Consultation

Our Modern Slavery Action Plan was developed with consultation from across the Hellers Group business including subject matter experts from Human Resources, Procurement, Finance and Operations.

During the reporting period this Statement covers, we actively engaged and consulted with all companies we own or control in the development of this Statement (entities outlined above). We discussed details of the Act's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

Approval and sign off

Our FY2024 Modern Slavery Statement was drafted externally with support from the business and the CFO. The Statement is reviewed in detail by the Modern Slavery Board sub-committee, with the final Statement approved by the Board.

Principal governing body approval

This Statement was approved by the Board of Hellers Group Holdings in their capacity as principal governing body¹² of Hellers Group Holdings Limited on 25th September 2024.

Angus Stuart

Signature of responsible member

This Statement is signed by Angus Stuart as a responsible member¹³ of the Board of Hellers Group Holdings Limited, in their role as Director, as defined by the Modern Slavery Act 2018:

¹² Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

¹³ Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.