

Modern Slavery Statement

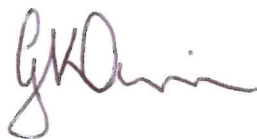
Entity Reporting

This statement is submitted under the *Modern Slavery Act 2018* (the Act) for Ellerslie Free Range Farms Pty Ltd (ABN: 74 140 998 045) and controlled entities:

- Abbeyliz Pty Ltd (ABN: 19 627 160 187): Cage Layer Operations
- Yallamundi Farms Pty Ltd (ABN: 49 635 480 269): Non-cage Layer Operations
- Domville No. 2 Pty Ltd (ABN: 24 009 789 182): Project Management (construction)
- DHP Poultry Property Company Pty Ltd (ABN: 53 672 017 319): Investment and Asset Management
- Notribe Pty Ltd (ABN: 51 096 409 451): Contract Labour Administration
- Diamond Poultry Pty Ltd (ABN: 21 096 410 936): Employment
- Diamond Poultry No. 3 Pty Ltd (ABN: 70 127 416 746): Employment
- Domville No. 3 Pty Ltd (ABN: 26 009 789 191): Employment
- Gold Cotton Pty Ltd (ABN: 19 096 410 927): Employment
- Doug Hall Farming Pty Ltd (ABN: 85 658 492 105): Dormant (non-operational)

This document has been reviewed in consultation with internal and external stakeholders. This engagement was necessary to ensure that existing and emerging risks are identified and addressed through appropriate actions.

The Ellerslie Free Range Farms Pty Ltd Modern Slavery Policy has been reviewed by the Board of Directors and the Senior Leadership Team and is signed as approved.



Greg Quinn

Chief Executive Officer

1. Structure, Operations and Supply Chains

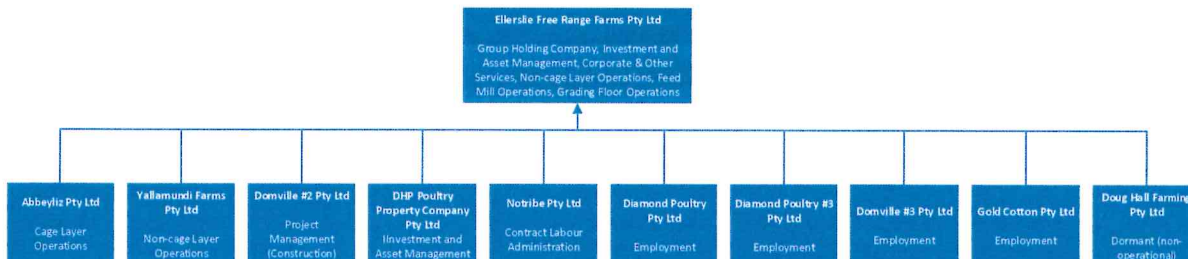
Ellerslie Free Range Farms Pty Ltd is a business located in Millmerran, Queensland, Australia, and operates within the Australian Poultry and Egg Production industry. The business is primarily engaged in poultry egg production from non-cage layer operations, including grading and packing operations and a pulp processing facility, supported by integrated farming and agricultural activities.

Ellerslie Free Range Farms Pty Ltd's operations also include feed milling, and associated agricultural supply activities, which support the company's poultry operations and broader supply chain requirements. The business operates predominantly within Australia and supplies products to domestic markets.

1.1 Structure

Ellerslie Free Range Farms Pty Ltd conducts its operations in Australia through several wholly owned and controlled entities operating under the parent entity, Ellerslie Free Range Farms Pty Ltd (**Diagram 1**). These entities collectively support the company's core business activities, including poultry egg production, farming and agricultural operations, and feed milling. Governance, strategic oversight, and operational controls are managed centrally through the parent entity.

Diagram 1. Ellerslie Free Range Farms Pty Ltd structure



1.2 Operations

Ellerslie Free Range Farms Pty Ltd is predominately an egg production, grading and packaging operation with support areas in:

- Feed mill production
- Rearing of layer pullets from day-old chickens
- Non-cage layer operations
- Egg grading and packaging process
- Workshop and maintenance facilities to maintain the rearing and layer operation
- Stores and purchasing
- Water and environment
- IT and Communications
- Administration including:
 - Finance
 - People & Culture
 - WHS
 - Quality Assurance
 - Business Development

- Veterinarian and animal welfare

1.3 Supply Chains

Ellerslie Free Range Farms Pty Ltd supply chains include local, state, country and global networks that support the operations. This includes but may not be limited to:

1.3.1 Global:

- Importation of the poultry shed infrastructure equipment
- Importation of the grading floor equipment
- Importation of the pulp plant equipment
- Importation of Feedmill equipment

1.3.2 Interstate:

- Transportation of day-old chickens to our rearing facility
- Egg packaging
- Labour hire
- Animal health and Welfare – Veterinarian
- Animal Nutrition

1.3.3 Local and QLD supplied by third parties:

- Grain
- Vaccines
- Feed additives
- Chemicals
- Fuel including unleaded, diesel and LPG
- WHS equipment
- Poultry husbandry supplies
- Fabrication equipment supplies
- Vehicle purchasing
- Pest control and the supply of relevant equipment and chemicals
- Labour hire
- Contractors:
 - Electricians
 - Plumbers
 - Earthmoving
 - Cleaners
 - Pest Control
 - Service-maintenance and breakdown
- Waste removal
- Professional services:
 - Training
 - Auditing
 - Accounting
 - Legal representation
 - Consulting
- Vehicle maintenance
- Tool and materials for maintenance work
- IT & Communication Services

2. Risks of Modern Slavery (in operations and supply chain):

The risk of modern slavery in business operations, and in particular those operations that extend globally through supply chains, are complex and the origin may be difficult to identify and manage. This difficulty derives from the exploitation of workers involved in the production of products and equipment that eventually find their way into our supply chain through and external supplier.

Table 1. Risk assessment

Risk	Indicators	Control Measure(s)
Child labour	<ul style="list-style-type: none"> • Underage • Underpayment • Hazardous work • Hours of work above the standard • Work experience student's hours 	<p>Policies in place and communicated. Refer to Table 2.</p> <p>Age/ Right-to-work checks; induction & supervision; school-based work experience agreements; roster & hours controls; restricted tasks for under-18s.</p>
Labour Hire	<ul style="list-style-type: none"> • Forced/bonded labour • Underpayment of wages • Deceptive recruitment • Exploitation of workers • Unskilled workers • Illegal labour practices 	<p>Policies in place and communicated. Refer to Table 2.</p> <p>Use licensed, approved and third party audited labour-hire provider.</p>
Seasonal Workers	<ul style="list-style-type: none"> • N/A 	<p>Ellerslie Free Range Farms Pty Ltd is a 365-day operation; this service is not applicable to our business.</p>
Manufacturing of equipment globally	<ul style="list-style-type: none"> • Forced labour • Underpayment of wages • Bonded labour • Exploitation of workers • Unskilled workers 	<p>Purchase via authorised distributors.</p> <p>Additional ongoing actions are planned to be completed in 2026. Refer to Future Action Plan Section 3.</p>
Transportation (Local)	<ul style="list-style-type: none"> • Underpayment of wages • Exploitation of conditions 	<p>Use of authorised suppliers.</p> <p>Additional ongoing actions are planned to be completed in 2026. Refer to Future Action Plan Section 3.</p>

Risk	Indicators	Control Measure(s)
		Please Refer to Action Section 3.
Electronic hardware	<ul style="list-style-type: none"> Forced labour Underpayment of wages Bonded labour Exploitation of workers Unskilled workers 	<p>Purchase via authorised distributors.</p> <p>Additional ongoing actions are planned to be completed in 2026. Please Refer to Action Plan Section 3.</p>
Vehicle supply	<ul style="list-style-type: none"> Forced labour Underpayment of wages Bonded labour Exploitation of workers Unskilled workers 	<p>Purchase via authorised distributors.</p> <p>Additional ongoing actions are planned to be completed in 2026. Please Refer to Action Plan Section 3.</p>
Grain production and supply	<ul style="list-style-type: none"> Forced labour Underpayment of wages Bonded labour Exploitation of workers Unskilled workers 	<p>Purchase via authorised distributors.</p> <p>Additional ongoing actions are planned to be completed in 2026. Please Refer to Action Plan Section 3.</p>
Professional services	<ul style="list-style-type: none"> Underpayment of wages 	Independent Award compliance assessment completed May 2026.
Contractors	<ul style="list-style-type: none"> Underpayment of wages Unskilled workers 	Please Refer to Action Plan Section 3.

Table 2. Policies in place:

Policies	Purpose
Code of Conduct	<ul style="list-style-type: none"> Establishes how all employees are to conduct themselves towards other employees, contractors and visitors.

Policies	Purpose
Force Labour and Child Labour Policy	<ul style="list-style-type: none"> Identifies concerns and process for raising concerns.
Whistleblower Blower	<ul style="list-style-type: none"> Identifies and facilitates a confidential process for wrongdoing disclosures
Equal Employment Opportunity – Discrimination, Vilification and Victimization Prevention Policy	<ul style="list-style-type: none"> Guidelines on correct workplace environment and confirms process for reporting grievances.
Diversity, Equity & Inclusion Policy	<ul style="list-style-type: none"> Ensure the continuation of our respectful diverse working environment – where we accept individuals from all walks of life.
Sexual Harassment Prevention Policy	<ul style="list-style-type: none"> A commitment to ensuring a healthy and safe workplace free from sexual harassment.
Workplace Harassment and Bullying Prevention Policy	<ul style="list-style-type: none"> Identifies workplace harassment and bullying behaviours and confirms process to be followed if required.
Conditions of employment policy	<ul style="list-style-type: none"> Identifies and explains the minimum conditions of employment.
Awards	<ul style="list-style-type: none"> Guidelines on correct payment of wages, conditions and other benefits.
Other HR policies as relevant	<ul style="list-style-type: none"> Guidelines for addressing employee, contractor, visitor welfare concerns.
Audits by external customers	<ul style="list-style-type: none"> Customer audits investigate Ellerslie Free Range Farms Pty Ltd's commitment to the Modern Slavery Act.
Labour providers	<ul style="list-style-type: none"> Transparency of wages paid to workers Consultation regarding conditions Service agreements evidencing the above
Grievance, Conflict and Dispute Handling Policy	<ul style="list-style-type: none"> Positive and open communication environment where workers can raise concerns through an agreed process if required.
Recruitment and Selection Policy	<ul style="list-style-type: none"> Confirms business focus of recruitment and retention of individuals with the necessary skills and attributes to enable Company to fulfil our vision and support our business goals.

3. Future Planned Actions

Ellerslie Free Range Farms Pty Ltd is committed to the continuous improvement of its approach to identifying, assessing, and addressing modern slavery risks within its operations and supply chains. Over the coming reporting periods, the business will focus on strengthening governance, procurement practices, and supplier engagement through the following planned actions:

Action	Due date
Investigation and establishment of a software program or an equivalent program to enable procurement management to align Ellerslie Free Range Farms Pty Ltd's human rights and Modern Slavery Act compliance within our supplier program.	31/12/2026
Conduct a review of the Responsible Sourcing Policy and implement it within the supplier program.	01/08/2026
Implement system of requesting suppliers and contractors to provide their Modern Slavery statements as applicable.	31/12/2026
Review, and amend as per required, current contracts and service agreements with the intent of incorporating a commitment to the Modern Slavery Act. To include the following: <ul style="list-style-type: none"> • Implement policy RE: sourcing global equipment • Employment contract compliance • Fatigue management • Chain of responsibility • Proof of wage compliance on request • Incident Reporting • Verification of Qualifications 	31/12/2026
To complete a quantitative assessment of contractors and suppliers.	31/12/2026

4. Assessing the Effectiveness of Actions Taken:

4.1 Risk Assessment and Review Process: Ellerslie Free Range Farms Pty Ltd conducts a qualitative review of its modern slavery risk assessment at least once per reporting period to confirm that identified risk areas and mitigation remain accurate and relevant. This review considers changes in business operations, labour arrangements, and supply chain composition. Effectiveness is assessed by:

- Evidence that risk assessment outcomes are informing planned actions and procurement decisions;
- Feedback from staff, suppliers and contractors;
- Regulatory fines;
- Management reviews;
- Compliance results as identified through internal review and external audits.

4.2 Governance and Policy Implementation: Effectiveness is assessed by confirming that modern slavery-related policies are in place, communicated to relevant personnel, and referenced within operational and procurement practices. Evidence of effectiveness includes:

- Policies being accessible to staff and referenced during induction or training;
- Consistent application of policy requirements across higher-risk activities; and
- Management oversight of modern slavery risks as part of broader compliance and risk review processes;
- Compliance results as identified through internal review and external audits.

4.3 Labour Arrangements and Workforce Controls: For labour hire, contractors, and other higher-risk labour arrangements, effectiveness is assessed by reviewing whether engagement practices align with documented requirements and legal obligations. Effectiveness is assessed through:

- Verification of labour hire licensing and right-to-work checks;
- Oversight of wages, hours of work, and working conditions where access is available;
- Accessibility and use of grievance and reporting mechanisms; and
- Compliance results as identified through internal review and external audits;
- The absence of unresolved underpayment, unsafe conditions, or exploitation indicators is considered an outcome-based indicator that controls are operating as intended.
- Ellerslie Free Range Farms Pty Ltd collaborate with the customer's base to ensure labour force management.

4.4 Issue Identification, Remediation, and Learning: Effectiveness is further assessed through the business's ability to identify, respond to, and remediate potential modern slavery issues. Indicators of effectiveness include:

- Documented investigation and resolution of identified concerns;
- Implementation and closure of corrective actions within appropriate timeframes; and
- Consideration of learnings from issues to strengthen controls.

4.5 Continuous Improvement and Maturity Over Time: Ellerslie Free Range Farms Pty Ltd recognises that modern slavery risk management is an evolving process. Effectiveness is therefore assessed by reviewing progress against planned improvement actions and changes in risk over successive reporting periods. Evidence of effectiveness includes:

- Completion or progression of stated future actions;
- Increasing consistency and coverage of controls; and
- Refinement of assessment processes as governance and systems mature.
- Leadership and Board reviews.