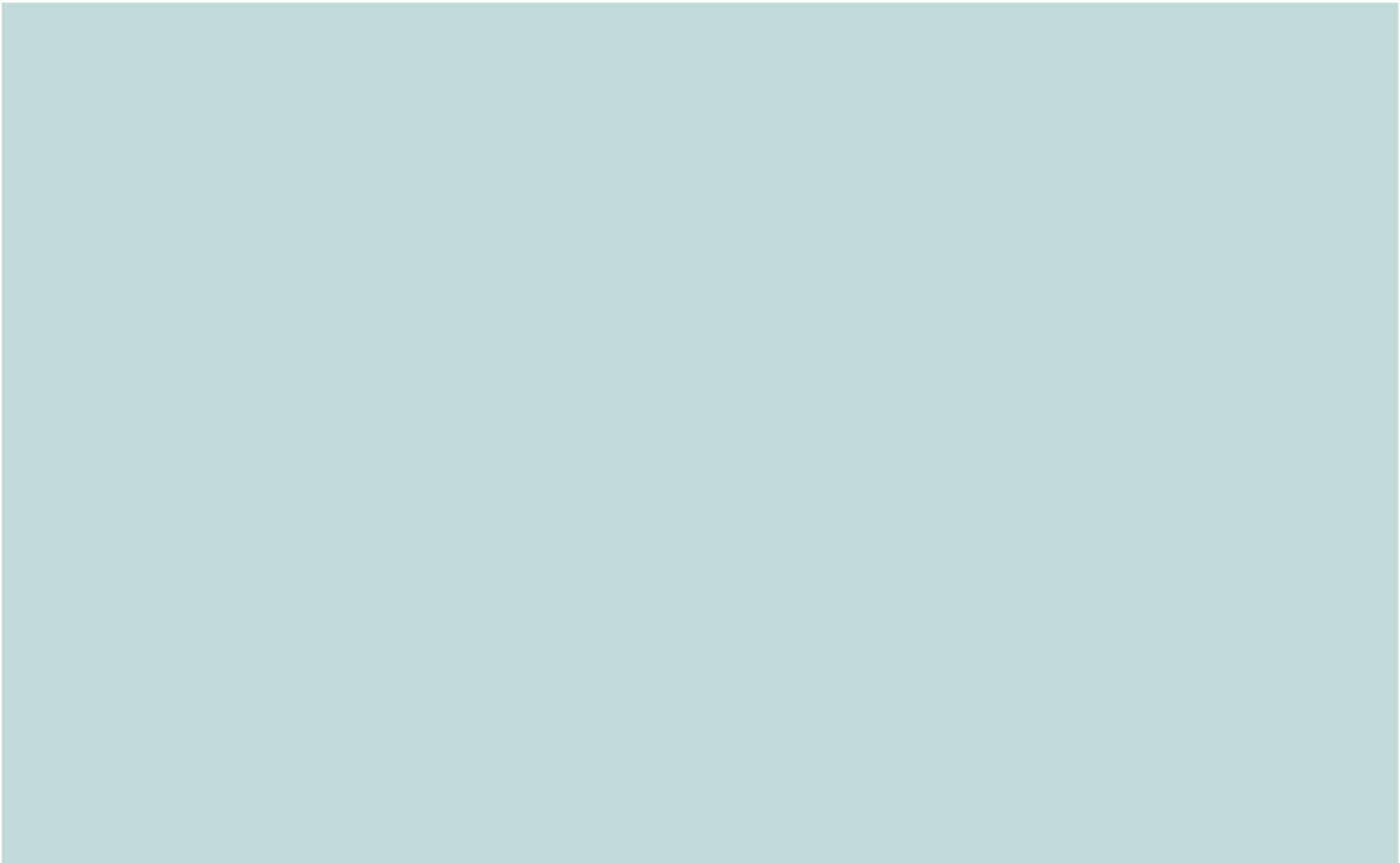


Craig Mostyn Group

Modern Slavery Statement 2023-24



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REPORTING ENTITIES

The Craig Mostyn Group is committed to limiting the risk of Modern Slavery occurring within its own business, within its supply chain or through any other business relationship.

This statement is provided by Craig Mostyn Holdings Pty Ltd (ACN 008 398 356) as a joint statement under the *Australian Modern Slavery Act 2018* [Cth] (**Modern Slavery Act**) for the financial year ending on 30 June 2024 (**FY24**). The statement relates to Craig Mostyn Holdings Pty Ltd and the following reporting entities, along with the controlled subsidiaries listed on page 3, collectively referred to as the Craig Mostyn Group:

1. Craig Mostyn Holdings Pty Ltd (ACN 008 398 356)
2. Derby Meat Processing Co Pty Ltd (ACN 008 679 016)
3. Derby Industries Pty Ltd (ACN 009 033 612)
4. Jade King Holdings Pty Ltd (ACN 611 994 917)

Craig Mostyn Group take a consolidated, whole-of-group approach to identifying and addressing risks of modern slavery. As such, this statement addresses the actions taken by all entities within the Craig Mostyn Group. Unless otherwise indicated in this statement, the terms 'Craig Mostyn Group', 'the Group', 'our business', 'we', 'us' and 'our' refer to Craig Mostyn Holdings Pty Ltd and its controlled entities collectively.

This statement has been approved by the Board of Craig Mostyn Holdings Pty Ltd and signed below by the Chair and Chief Executive Officer.



Neil Kearney
Chair of the Board of Directors

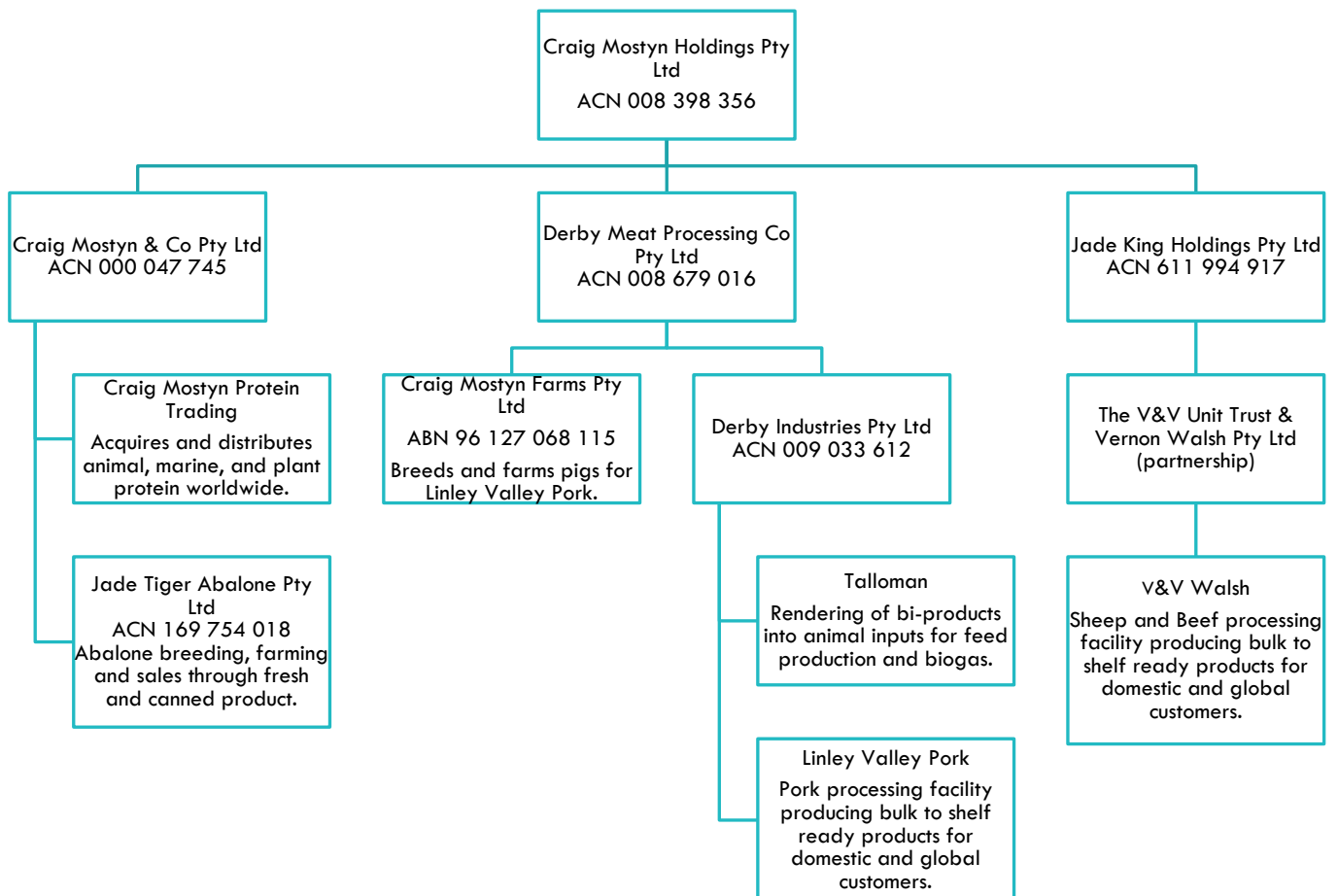


Wayne Crofts
Chief Executive Officer

OUR STRUCTURE, BUSINESS OPERATIONS AND SUPPLY CHAINS

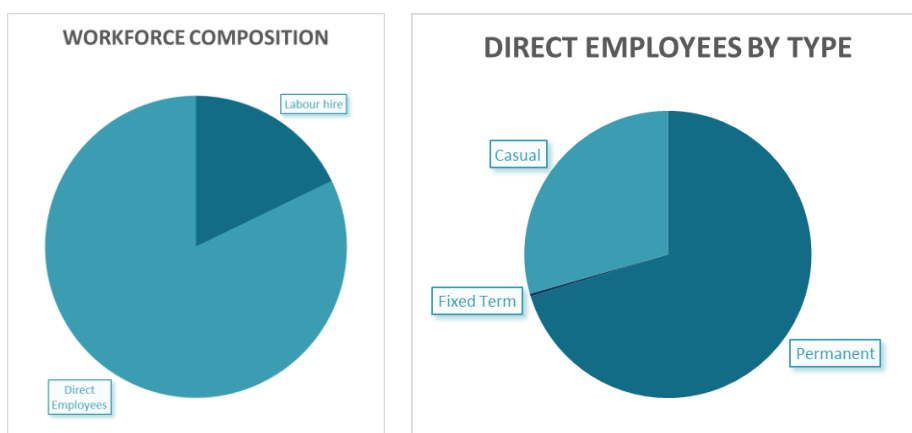
Craig Mostyn Group an Australian private food and agribusiness company with over 1,200 employees. The Group services customers both domestically and overseas. We directly employ workers and operate farms and abattoirs in Western Australia for pork, lamb and beef, and abalone farms and processing facilities in Victoria and Tasmania.

Our Structure



Our People

On 30 June 2024, the group directly employed 1,228 people across our operations and a further 222 people through labour hire arrangements.



Employee Demographics	Protein Trading	Jade Tiger Abalone	Linley Valley Pork	Craig Mostyn Farms	Talloman	V&V Walsh	Craig Mostyn Group
Direct Employees - Employment Type							
Permanent (full-time and part-time)	9	35	298	93	62	330	864
Fixed term (full-time and part-time)	1	0	2	0	0	0	4
Casual	0	46	85	5	5	219	360
Total	10	81	385	98	67	549	1228
Direct Employees - Visa Arrangements							
Australian Employees	100%	65%	72%	55%	89%	61%	67%
Non-Australian Employees on Visas	0%	35%	28%	45%	11%	39%	33%
Labour Hire Workers							
Total by location	0	3	78	6	0	135	222

Our Supply Chain

We have supplier relationships working with over 1,600 suppliers, contractors, vendors, and service providers. Where possible, Craig Mostyn Group sources goods and services locally across the agribusiness life cycle, including items such as stock, feed, personal protective equipment, packaging, and chemicals. We recognise that while these supplies may be provided by an organisation domiciled in Australia, they may be sourcing products or raw materials from other origins.

MODERN SLAVERY RISKS IN OUR OPERATIONS AND OUR SUPPLY CHAIN

Risk in Our Operations

In FY23 we identified the Modern Slavery Risks arising from our own operations as listed in the table below. These risks occur in all operational sites who all rely on recruitment of international labour hired directly to operate our facilities.

Risk Area	Nature of risk
Forced or bonded labour	<ul style="list-style-type: none"> Foreign employees recruited through third parties in country of origin. Engagement of foreign workers through labour hire providers engaging works under the Pacific Island Labour Mobility (PALM) scheme.
Exploitation of migrant workers	<ul style="list-style-type: none"> Foreign workers are required to work under conditions less favourable than Australian workers or outside the conditions of their visa. Foreign workers are subject to threats of visa cancellation.
Deceptive recruitment	<ul style="list-style-type: none"> Debts incurred by foreign workers during recruitment process.
Underpayment of Wages	<ul style="list-style-type: none"> Employee wages and entitlements are not in accordance with relevant industrial instrument or legislation. Labour Hire wages and entitlements are not in accordance with relevant industrial instrument or legislation.
Excessive Working Hours	<ul style="list-style-type: none"> Hours of work regularly exceed 60 hours per week.

In August 2023 Linley Valley Pork participated in a SEDEX Members Ethical Trade Audit that found 16 non-conformances in the following categories:

- 1 related to excessive working hours
- 14 related to safe working conditions
- 1 related to grievance mechanisms

In April 2024 V&V Walsh Meat Processors and Exporters participated in a SEDEX Members Ethical Trade Audit that found 2 non-conformances, both related to wages for Labour Hire Provider (LHP) workers.

For both sites, these findings were addressed and remediated within 90 days (maximum) of each audit, with some findings requiring ongoing training and support that had been put in place via our induction programs and on-site signage in multiple languages.

Risks in Our Supply Chain

A high-level assessment of 1,600 suppliers to Craig Mostyn Group identified the following:

Major Suppliers (annual expenditure > \$250,000):

- 197 suppliers, contractors, vendors, and service providers representing around 90% of total annual expenditure.
- 186 of these suppliers are Australian owned / domiciled organisations.

Australian Suppliers:

- Australian suppliers, contractors, vendors, and service providers represent 97% of total annual expenditure.

International Suppliers:

- Total Spend on Overseas Suppliers: Approximately 3% of total annual expenditure.
- Total Overseas Suppliers: 40 across the group
- 11 of these 40 sit within our group of Major Suppliers

A breakdown of international supplier origin is provided on the following page of this statement.

COUNT OF SUPPLIERS INTERNATIONALLY, CATEGORISED BY ENTITY AND COUNTRY	FEED	PACKAGING	PLANT AND EQUIPMENT	MARKETING	RECRUITMENT	FINISHED GOODS
CRAIG MOSTYN & CO						
CHINA		2				
CZECH REPUBLIC						1
DENMARK			1			
GERMANY			1			2
HONG KONG				2		
INDIA						2
INDONESIA						4
MALAYSIA						1
MAURITIUS						1
NETHERLANDS			1			1
NEW ZEALAND						3
NORWAY						1
PHILIPPINES					1	
SEYCHELLES						2
SINGAPORE				2		1
SOUTH AFRICA	1					1
SOUTH KOREA						1
CRAIG MOSTYN & CO TOTAL	1	2	3	4	1	21
DERBY MEAT PROCESSING						
CHINA			1			
FINLAND			1			
MALAYSIA			1			
PHILIPPINES					1	
SOUTH AFRICA					1	
SPAIN			2			
THAILAND			1			
UNITED KINGDOM			1			
DERBY MEAT PROCESSING TOTAL			7		3	
JADE KING HOLDINGS						
HONG KONG				1		
NEW ZEALAND			1			
PHILIPPINES					1	
JADE KING HOLDINGS TOTAL			1	1	1	

ACTIONS TAKEN

Policy

Craig Mostyn Group established a Modern Slavery Policy in 2020 outlining the minimum standards both CMG and its suppliers must comply with. The policy was fully reviewed in FY24 to ensure compliance with the *Modern Slavey Act 2018* and alignment with current processes and future aspiration.

Grievance Mechanisms – Confidential Reporting

Craig Mostyn Group employees have access to confidentially report issues via telephone, email or in person through a Grievance Procedure and a Whistleblower Policy. The Whistleblower Policy includes protections for Whistleblowers and provides a Whistleblower Hotline operated by a third party to whom reports can be made anonymously.

Signage is provided at all operational sites in multiple languages to ensure employees and labour-hire workers are aware of the process to make an anonymous and confidential report.

Each whistleblower disclosure received is investigated and reported to the Chair of the Audit & Risk Management Committee. The Group's grievance procedure ensures all grievances are managed in a systematic, fair, timely and transparent manner.

No reports relating to Modern Slavery were made via either of these mechanisms in FY24.

Training for Employees

Craig Mostyn Group provides training to all employees and long-term labour hire contracts on Modern Slavery, our Grievance Procedure and Whistleblower Policy through our induction process. For leaders responsible for purchasing and engaging suppliers, more detailed training on Modern Slavery is provided via an online learning module.

International Recruitment & Migration Services

In 2023, Craig Mostyn Group engaged the services of an experienced migration lawyer to review our internal processes and make recommendations on how we monitor and manage third parties recruiting internationally on our behalf and providing migration services.

Based on the findings and recommendations, we have adopted a single migration agent to provide professional services and legal advice in relation to visa and nomination applications and associated matters. We have reviewed service agreements with international recruiters to ensure all services and charges are clearly articulated for recruitment in the Philippines and Vietnam. These actions will be replicated in other countries as new recruitment providers are identified.

Service agreements for both recruitment and migration services include commitments to reducing the risk of modern slavery and mechanisms to exit agreements should breaches of the covenants occur.

Supplier Due Diligence and Risk Assessment

In 2023-24 Craig Mostyn Group implemented the iPro system, to strengthen our capability to assess major and high-risk suppliers, prioritise those with significant annual spend or high-risk domiciles and provide guidance of actions to address and reduce modern slavery risks within our supply chain.

Through a supplier self-assessment process and dashboard report, we can identify where risks exist and work with our supply partners to address and reduce risks.



Given that a large proportion of our suppliers within the Australian agricultural sector, we have committed to supporting them through iPro's resource planning tools. Using iPro's functionality, we plan to collaborate with suppliers on tailored action plans and provide post-assessment guidance to help them mitigate identified risks.

SUPPLIER ASSESSMENTS / SUPPLIERS / TOPHAM BROTHERS

Supplier Action Plan

The Action Plan is designed to help this supplier reduce their modern slavery risk. The actions below are based on their assessment responses, and are prioritised in order of their impact on the supplier's unmitigated risk score.

Not yet completed actions

Completed actions

INFORMATION REQUIRED

Supplier to assess whether they enrol workers in annual modern slavery, human trafficking and child labour risk awareness education and training

1 Linked question

7.49
unmitigated risk

INFORMATION REQUIRED

Supplier to assess whether they issue a modern slavery risk compliance policy to its suppliers

1 Linked question

Resource available

6.74
unmitigated risk

INFORMATION REQUIRED

Supplier to assess whether they issue a continual modern slavery risk identification and assessment process to its operations

1 Linked question

3.75
unmitigated risk

INFORMATION REQUIRED

Supplier to assess whether they issue a vulnerability assessment policy

1 Linked question

Resource available

3.75
unmitigated risk

INFORMATION REQUIRED

Supplier to assess whether they issue a withholding worker identity and immigration documents policy

1 Linked question

Resource available

3.00
unmitigated risk

INFORMATION REQUIRED

Supplier to assess whether they issue a recruitment fees policy

1 Linked question

Resource available

3.00
unmitigated risk

CURRENT

High-Risk (Inadequate risk control)

59.41 Unmitigated risk

Reduce unmitigated risk by 0.85

NEXT TARGET

Medium-Risk (Partial risk control)

58.56 Unmitigated risk

Reduce your risk score

Subscribe your suppliers to the iPro Modern Slavery Policy Framework. Suppliers can access policy templates to customise for their own business. [Learn more](#)

EFFECTIVENESS OF ACTIONS TAKEN

Providing information on utilising grievance mechanisms in multiple language has been noted by employees, but as mentioned earlier in this statement, has not led to an increase in issues reported.

Training at the point of commencing highlights to employees both the importance of preventing modern slavery from occurring in our operations or supply chain but also ensure they are aware there is a process to make confidential and protected reports if they observe or experience actions misaligned with our intent.

The changes to our migration and international recruitment providers occurred in March 2024 and the first review of the new agreements won't occur until 2025. However, the efficiency and transparency of services is evident following this change and enables the Craig Mostyn Group recruitment team to focus on engagement with new employees and ensuring fees are as per the agreements with no hidden or unreported costs.

The iPro system has improved our data collection and analysis processes, and expanding coverage to all high-risk suppliers remains a priority. Our focus for the coming year is to maximise iPro's capabilities to develop a more comprehensive, proactive risk management approach.

CONSULTATION PROCESS

The General Managers of each operational business unit were consulted in the risk assessment process outlined in this statement. Input was also sought from the following teams:

- Quality
- Safety
- People, Culture & Capability
- Procurement
- Information Technology
- Finance

OTHER INFORMATION & LOOKING AHEAD

In FY25, we will continue to improve the way we approach and manage Modern Slavery risks in our operations and our supply chain. A summary of the key actions planned is below:

1. Increase the number of suppliers who has completed self-assessments within the iPro system.
2. Implement the supplier onboarding process and due diligence assessments.
3. Identify suppliers participating in ethical / social audits and seek to link with our own social audits.
4. Identify appropriate international recruitment partners in South Africa and other key markets.
5. Review and update training programs for leaders in relation to identifying and managing Modern Slavery risks.