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Joint Modern Slavery Statement 2020 / 2021 Financial Year

Date: 15 November 2021

1 INTRODUCTION

This Joint Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) (**the Act**). OMC Australia (ABN 39 004 663 094) (**OMC**) and Oakdale Meat Co Pty Ltd (ABN 24 619 477 888) (**Oakdale**) are Reporting Entities as defined by the Act.

The purpose of this Statement is to outline the steps taken by OMC and Oakdale in the 2020 / 2021 financial year (the relevant reporting period) to minimise the risk that modern slavery is occurring in its supply chains or in any part of its business.

OMC and Oakdale acknowledge the importance of the Act and appreciate the Act's valuable contribution to eradicating modern slavery. OMC and Oakdale acknowledge their responsibility, both individually and collectively, for respecting human rights in their operations and supply chains as outlined in the United Nations Guiding Principles on Business and Human Rights (UNGP).

OMC and Oakdale are committed to respecting the rights of its employees and do not tolerate any form of slavery or forced labour in its operations and the operations of suppliers.

For completeness, this Statement also contains forward-looking statements, including OMC and Oakdale's current intentions and opinions. There is no certainty in the outcome for the matters contained in the Statement, meaning the outcomes could be different from the intentions expressed in this Statement.

2 STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Oakdale and OMC are family owned and operated in Victoria. Oakdale was established in 1947 and operates a beef processing plant at 39 – 41 Amberley Crescent, Dandenong South Vic 3175.

OMC processes around 360 tonnes of beef per week. The beef processed by OMC is sold to Oakdale and distributed to the broader Australian wholesale market.

Oakdale offers four premium brands of beef to its customers:

- (a) Beaumont Premium Meats;
- (b) Oakdale Premium Angus Beef;
- (c) Sunday Creek Premium Beef; and
- (d) Tallarook Premium Grain Fed Beef.

Oakdale also operates an on-site butcher shop which is open to the general public. The butcher shop is located at the Dandenong facility.

Oakdale uses Australian cattle for each of its four brands. The cattle sourced by OMC is of the highest quality and is sourced predominantly from Victoria and some parts of New South Wales.

Oakdale and OMC are committed to ensuring consistent high quality and standards of all Oakdale products. All products go through the highest food safety and food quality standards. This includes full accreditation by Prime Safe and regular audits from SGS and Aus-Meat to ensure stringent food safety and quality standards are maintained. OMC is accredited by Meat Standards Australia and the HALAL Certification Authority. All processing employees are enrolled in National Certificate Courses in food handling and safety with training conducted on site.

Operations and Supply Chain

OMC's supply chain commences with livestock being purchased at either a cattle market or privately through farmers. OMC utilises stock and station agents for the purchase of cattle at market. With its network of experienced cattle buyers, Oakdale is able to offer a consistent high quality and grade of cattle all year round.

After cattle are purchased, OMC arranges transportation of the cattle to the abattoir. OMC contracts the slaughter of the cattle at the abattoir as OMC does not have these facilities. The beef carcass is subsequently transported to the Dandenong facility.

The Dandenong facility has state of the art technology and is one of the largest domestically accredited boning rooms in Australia.

OMC employs a range of employees who are involved primarily in meat processing. OMC has dedicated employees who break the meat down once transported from the abattoir to produce quality cuts of meat consistent with customer specifications. Beef cuts are graded according to Aus-Meat specifications then labelled and transferred into high quality cartons.

OMC specialises in vacuum packed cuts of beef. OMC offers further beef processing options such as mincing, dicing and portion control as well as blast freezing depending on customer requirements. All beef processing works are undertaken at the Dandenong facility.

Once the beef has been cut and graded, the vacuum-packed beef is packaged according to customer specification. OMC then sells the packaged beef products to Oakdale.

Oakdale employs general administrative staff, sales representatives, production workers, butchers shop clerks, warehousing and distribution employees. Oakdale also has a trading division where boxed meat is bought and sold at competitive prices external to the OMC operations.

Oakdale sells the products domestically and export's to:

- (a) supermarkets;
- (b) small good manufacturers;
- (c) food services; and
- (d) retail.

In this context, all Oakdale and OMC processing operations are supported by external providers. All providers are based in Australia and products are distributed and sold domestically. OMC and Oakdale engage external suppliers for:

- (a) transportation;
- (b) packaging suppliers; and

- (c) distribution.

3 RISKS OF MODERN SLAVERY PRACTICES

Oakdale and OMC do not accept modern slavery practices in their business activities and have a zero-tolerance approach towards any form of forced labour, child labour or harassment in their supply chains and workplaces.

Oakdale and OMC have assessed their operations and supply chains against known modern slavery risk indicators. Oakdale and OMC have determined that the risk of modern slavery practices existing within its operations and supply chains is low.

OMC sources its beef from farms and facilities located in Australia. Australia is inherently a low risk jurisdiction in the context of modern slavery. However, OMC understands the risks associated with the agriculture industry with modern slavery practices stemming from the use of unskilled, migrant labour and remote farms.

4 ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

Internal Actions

Upon commencement of employment, OMC and Oakdale employees undertake training on internal policies and procedures. This includes specific training addressing the Oakdale and OMC Employee Handbooks (the **Handbooks**). The Handbooks are substantially similar with some minor nuances to accommodate the nature of the work performed by Oakdale and OMC. However, the content and expectations of employees are largely mirrored between the Handbooks.

OMC and Oakdale have recently undertaken an audit of employment agreements. These agreements have now been finalised and are being distributed to employees. The updated employment agreements provide a more comprehensive framework to convey the terms and conditions of employment in a manner that is consistent with the Australian regulatory framework.

The Handbooks contain the following policies which address human rights and promote diversity and inclusion within all OMC and Oakdale operations:

- (a) bullying and harassment;
- (b) equal opportunity;
- (c) health, safety and welfare;
- (d) corporate responsibility;
- (e) code of conduct; and
- (f) human rights.

In accordance with the Corporate Responsibility Policy, both Oakdale and OMC commit to ensuring that business is conducted in a responsible manner according to rigorous business ethics, professional and legal standards. This includes a commitment to ethical trading, which says:

'We recognise the responsibility that we share with our suppliers to source products in an ethical manner. We want our customers to be confident that people are treated fairly, are not exploited and are not exposed to unsafe working conditions'.

OMC and Oakdale have a joint Human Rights Policy which was most recently updated on 20 April 2020. The Human Rights Policy reinforces that OMC and Oakdale:

- (a) respect and support the dignity, wellbeing and human rights of employees, the communities in which we live and those affected by our operations;
- (b) undertake to identify, prevent and mitigate adverse human rights impacts of our operations;
- (c) reject any form of slavery, forced or child labour;
- (d) support and implement the Voluntary Principles on Security and Human Rights and ensure relevant employees and contractors are trained in accordance with these principles; and
- (e) make consultants, agents, contractors and suppliers aware of OMC and Oakdale's human rights commitments and expect their compliance with these commitments. This also includes business partners respecting OMC and Oakdale's commitments to upholding human rights.

Upon commencement of employment, employees undertake an induction which provides a comprehensive overview of the Oakdale and OMC policies and procedures to ensure understanding and ongoing compliance.

Oakdale and OMC also have internal grievance and issue resolution procedures. The procedure is contained in the Handbooks and is provided to employees during their induction. The grievance and issue resolution procedure outlines the process for raising complaints or formal grievances in the workplace. This also extends to situations where a grievance directly rates to a manager or supervisor.

Employees are encouraged to speak to their manager or supervisor about any concerns they have regarding their employment and escalate these concerns as necessary using the grievance procedure.

External Actions

OMC and Oakdale provide an 'Approved Supplier Survey' to all approved suppliers including trade and services, raw materials and packaging. The purpose of the Approved Supplier Surveys is to ascertain whether the supplier holds the required accreditations before supplying goods and services to Oakdale and OMC.

OMC and Oakdale are currently updating the Approved Supplier Surveys to address modern slavery risks. The content will require the supplier to comment on whether they:

- (f) agree to comply with Oakdale and OMC's modern slavery commitments and code of conduct; and
- (g) have any written policies and procedures relating to modern slavery, human rights and ethical trading.

The introduction of these sections is still in the early stages of review and amendment. However, Oakdale and OMC will insist on suppliers completing information about the modern slavery risks to enable it to more comprehensively monitor risks in its supply chain before contracting with Oakdale and OMC in the future.

Oakdale and OMC are undertaking a further review into policies and practices and propose to undertake a more substantive review of these practices. This may include reviewing relevant policies and contractual arrangements with suppliers to establish a more comprehensive framework.

5 ASSESSING ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

Oakdale and OMC acknowledge that it is still in the early stages of reviewing and managing modern slavery risks. Our current focus is on identifying where modern slavery risks exist in our practices and establishing controls to manage these risks accordingly. This remains a work in progress. However, Oakdale and OMC understand the importance of these actions in managing modern slavery risks.

Employment Risks

Oakdale and OMC are committed to treating current and prospective employees with fairness and respect. As noted above, Oakdale and OMC have extensive workplace policies to achieve these purposes.

Employees are subject to pre-employment screening, which will confirm their right to work in Australia and understand VISA restrictions or requirements as necessary. Oakdale and OMC undertake this process to ensure that all employees are properly registered to work in Australia and minimising the risk of improper practices contributing to modern slavery in this context.

As noted above, Oakdale and OMC have recently introduced new employment contracts, which are consistent with the National Employment Standards. All other terms and conditions of employment are captured by various modern awards, including the Meat Industry Award 2020.

The internal policies reinforce Oakdale and OMC's rejection of any form of slavery, forced or child labour.

Industry Risk

Oakdale and OMC operate in the agricultural sector. Agriculture is inherently a higher-risk industry given the use of itinerant and migrant labour.

Oakdale and OMC acknowledge the need to implement rigorous assessment processes throughout its supply chain operations to reinforce human rights standards and a zero-tolerance approach to modern slavery.

The COVID-19 pandemic has increased the vulnerability of workers and effected supply chains throughout Australia. During this time, Oakdale and OMC's primary focus has been on ensuring the health and safety of its employees who were required to attend work during this time. Oakdale and OMC intend to revisit the areas for further development relating to monitoring modern slavery risks in its supply chain.

Oakdale and OMC have identified the following areas for further development to address these risks:

- (a) introducing a more comprehensive modern slavery questionnaire for current and prospective suppliers; and
- (b) communicating Oakdale and OMC's expectations as contained in the Human Rights Policy to current and prospective customers where practicable.

6 OTHER RELEVANT INFORMATION

The two reporting entities covered by this Statement share common processes and approaches to assess and manage modern slavery risks.

Given the relationship between the two entities, the risks of modern slavery in supply chains as outlined above apply equally.

Oakdale and OMC will continue to work collaboratively to review current practices to eliminate modern slavery to the extent possible.

7 CONCLUSION

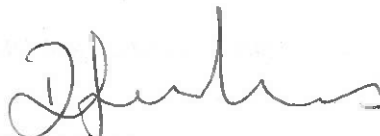
As outlined above, OMC and Oakdale are dedicated to continuous improvement, which includes continuing to assess and address the risks of modern slavery within its business. OMC and Oakdale are dedicated to ensuring that the framework and policies it has created and those created in the future are appropriately communicated and observed across both entities.

Oakdale and OMC are committed to building on this approach in the coming years.

This Statement is made pursuant to section 14(1) of the Act and constitutes a mandatory joint modern slavery statement on behalf of OMC Australia and Oakdale Meat Co Pty Ltd for the reporting period of the 2020 / 2021 financial year. This Statement has been approved by the principal governing body of each of OMC and Oakdale on 15/11/2021. This Statement is signed by Brooke Dawson as the Director and Chief Executive Officer of OMC and Oakdale and David Jenkins as the General Manager of Operations for OMC and Oakdale:



Brooke Dawson
Director and Chief Executive Officer
OMC Australia
Oakdale Meat Co Pty Ltd
Date: 15/11/2021



David Jenkins
General Manager of Operations
OMC Australia
Oakdale Meat Co Pty Ltd
Date: 15/11/2021