



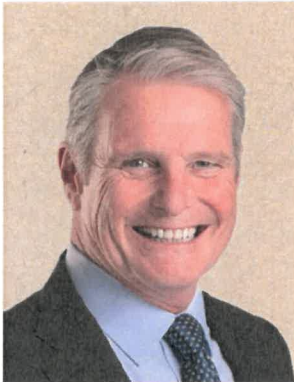
Modern Slavery Statement FY2022

A statement setting out what we have done to identify, manage and mitigate risks of modern slavery in our operations and supply chain.

INGHAM'S GROUP LIMITED

ACN 162 709 506

("Ingham's" or "Company")



At Ingham's Group, we are committed to preventing slavery, exploitation and human trafficking from our direct and indirect supply chains. To achieve this, we assess risks of modern slavery where practical, safeguard our workforce and monitor our supply chains against any actual or potential criminal and inhumane treatment of people in their employment.

We maintain high standards of corporate governance to comply with all relevant local laws and regulations for our business, including a focus on preventing and addressing risk in our supply chains related to modern slavery and human trafficking. We take pride in the integrity and transparency of our people and our partners to operate in a socially ethical way.

Our company policies communicate and support ethical and professional conduct and behaviours within our business, including a Whistleblower Policy to enable our employees to speak up against any misconduct, including breaches of legislation, criminal activity and unethical behaviour. The same high standard of conduct and ethical behaviour is expected from our suppliers.

This Modern Slavery Statement relates to our actions and activities for the financial year ended 30 June 2022 and complies with the mandatory criteria requirements for modern slavery statements in line with the Modern Slavery Act.

Andrew Reeves

Chief Executive Officer and Managing Director

Inghams Group Limited

Ingham's Group FY2022 highlights:

- **Introduced supplier workplace relations and immigration compliance auditing program for higher risk industries such as labour hire, contract cleaning, security services and road transport.**
- **Three independent workplace relations and immigration compliance audits completed during FY22 did not identify any instances of modern slavery.**
- **Delivered updated leader reference guides, training videos and policies for whistleblower, prevention of bullying, harassment and discrimination programs through our company-wide accessible Workplace communication platform.**
- **To improve identification of potential risk in our supply chains, we engaged specialist third party data enrichment and risk analysis service providers.**
- **Identified Tier 2 suppliers for our top 500 priority vendors.**



Compliance with modern slavery reporting requirements

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1. Identification of the Reporting Entity

This Modern Slavery Statement is a joint statement made by Inghams Group Limited and on behalf of its subsidiaries, which are Reporting Entities as set out in [Appendix 1](#) (each a “Reporting Entity”) (“Ingham’s Group”). This Statement has been prepared in consultation with each Reporting Entity covered by the Statement in the manner referred to in section 6 of this Statement. For each Reporting Entity, the Statement is approved by Inghams Group Limited, which is a higher entity and in a position to influence or control each Reporting Entity covered by the Statement. As regards to Inghams Group Limited, the Statement is approved by its Board of Directors.

2. Description of Ingham’s Group structure, operations and supply chains

Ingham’s Group is a leading Australian and New Zealand poultry food processing company listed on the Australian Securities Exchange (ASX) and employs approximately 8,000 people. Ingham’s Group produces and supplies poultry, value-added protein products and feed products to a broad range of customers, including major retailers, quick service restaurant (QSR) operators, food service distributors, poultry wholesalers and animal feed customers.

2.1 Ingham’s Group operations

Our scale and operations span the entire value chain from farming to processing and distribution. Our poultry supply chains are vertically integrated within the business. We source our goods and services from more than 4,000 direct suppliers (Tier 1), predominantly based in Australia and New Zealand. The supply chain industries that we procure from are varied and span from feed, packaging, ingredients, consumables and uniforms to services such as cleaning, distribution and freight.

Our website – at ingham.com.au – provides information on our company, purpose and products.

Ingham’s Group is comprised of the following vertically integrated business units, which are in all states and territories across Australia and in New Zealand.

Our key operations are:

- **Farming:** includes breeder farms for fertile egg production as well as hatcheries and the broiler farms (independent contractors) for the growing of meat chickens.
- **Feed milling:** production of stockfeed, the majority of which is for internal use in Ingham’s Group poultry business, with sales to other customers in the poultry, pork and dairy sectors.
- **Poultry processing:** primary and further processing of chickens and turkeys into products for sale to major retail customers, QSRs, food service and wholesale customers.
- **Distribution:** warehousing and distribution of poultry products to customers.



Distribution of Ingham’s Group employees by geographic location and business unit is shown in Figures 1 and 2.

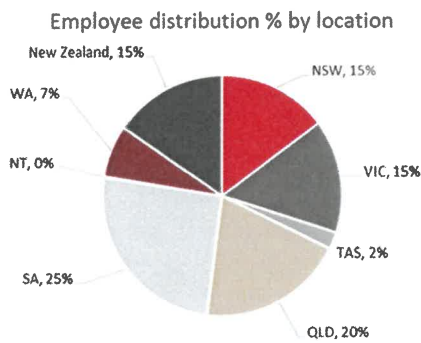


Figure 1: Percentage distribution of employees by geographic location

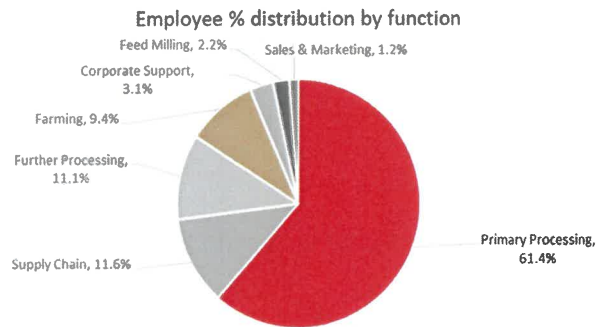


Figure 2: Percentage distribution of employees by business unit

2.2 Our supply chains

In FY22, Ingham’s Group sourced goods and services from more than 4,000 direct suppliers (Tier 1), which includes low spend and one-time vendors. Of these, approximately 1,100 are suppliers with more than \$100,000 in spend. The majority of Tier 1 suppliers are based in Australia and New Zealand, with 1% located in other regions such as America, Europe, Asia, and Africa. Figures 3 and 4 provide a breakdown of the distribution by vendor location and also by spend for FY22.

Tier 1 Supplier Breakdown by Location

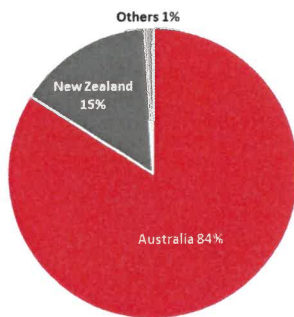


Figure 3: Tier 1 Supplier breakdown by location

Tier 1 Supplier Location by Spend

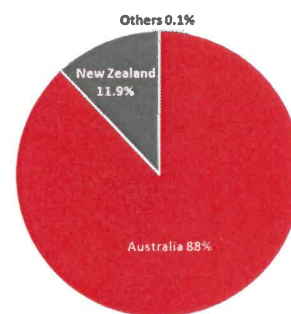


Figure 4: Tier 1 Supplier by location based on spend

Examples of direct categories sourced in our supply chain include feed, ingredients and packaging and for indirect categories include transport and logistics, uniforms and personal protective equipment (PPE), waste services and cleaning services.



Our top direct and feed categories by spend:



Feed



Ingredients & Pet Food Ingredients



Packaging

Our top indirect categories by spend:



Business Services



Farm & Husbandry



Transport, Logistics & Warehousing



Professional Services



Property, Utilities and FM

While our direct suppliers are based in Australia and New Zealand, these suppliers can source goods from overseas. For our top 500 priority vendors, we have identified where our Tier 2 suppliers (suppliers or subcontractors to our Tier 1 vendors) are located. This is shown in Figure 5. Detailed description of how these suppliers were identified is discussed in section 3.3.

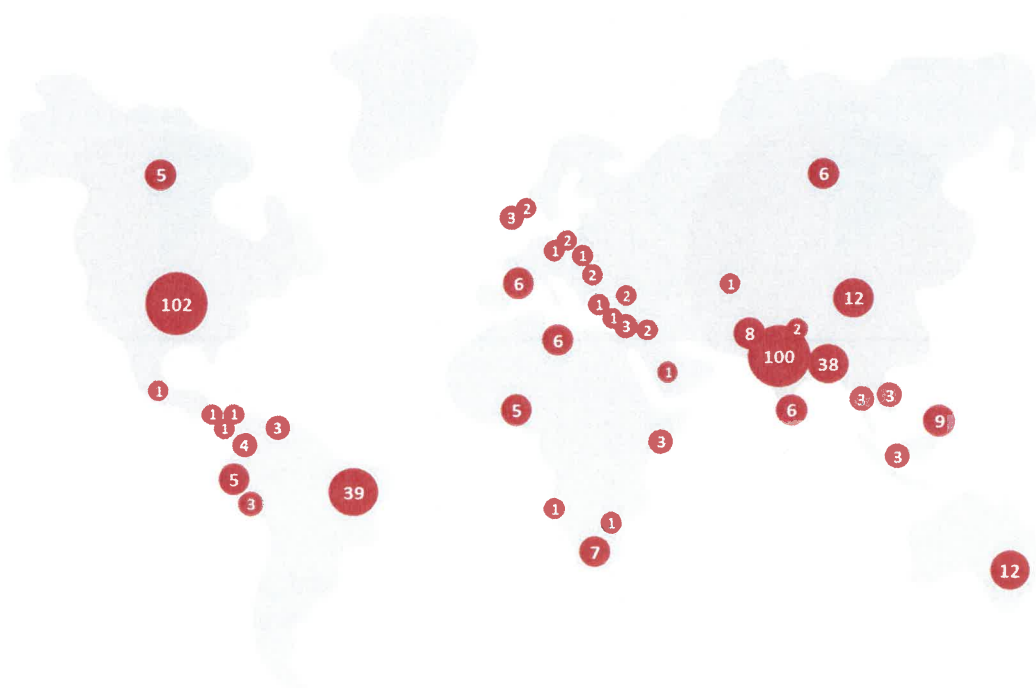


Figure 5: Tier 2 supplier distribution of the top 500 priority vendors



The majority of Tier 2 suppliers are based in the USA and India, 102 and 100, respectively. The remainder of Tier 2 suppliers are spread across Australia, Africa, Asia, South America, Europe and North America. This group of suppliers covers industries such as professional, scientific and technical services, chemical manufacturing, food manufacturing, publishing, and computer and electronic product manufacturing.

3. Description of modern slavery risks in our supply chains

3.1 Risks in our operations

Ingham's Group operations and each Reporting Entity are considered to have a low risk of modern slavery practices for the reasons set out below. Ingham's Group and the Reporting Entities have no operations outside of Australia and New Zealand.

The vast majority of Ingham's Group employees at its own operations are directly employed. In this regard, the risk of modern slavery is considered low. Ingham's Group strives to establish workplace relations that are fair, constructive and collaborative. Collectively negotiated agreements cover 86% of our people in operations across Australia and New Zealand, with 93% coverage in Australia. In Australia, these agreements are approved by the Fair Work Commission to ensure that employees are better off overall compared to the applicable minimum terms of modern awards. In New Zealand, these agreements are approved and signed by the relevant trade union. These collectively negotiated agreements stipulate minimum conditions for wages, hours of work, overtime conditions, additional remuneration, leave entitlements and redundancy benefits.

Where the relevant employees are not covered by collectively negotiated agreements, in Australia they are typically employed under the terms of modern awards, on above-award wages, and in New Zealand they are employed under the terms of individual employment agreements. For more senior positions, these are commonly engaged under the terms of common law contracts.

All Australian employees remain subject to the minimum conditions in the National Employment Standards and New Zealand employees remain subject to the minimum conditions of the Employment Relations Act. These minimum conditions are supported by a range of policies providing additional benefits, such as paid parental leave. Ingham's Group employment practices comply with all local laws in Australia or New Zealand (as relevant).

Our recruitment process has strong governance. Employment decisions are based on the principle of merit, with no instances of forced labour. All employees must demonstrate their legal right to work in Australia. We also note that for FY23, Ingham's Group has introduced a new visa verification system to support ease of collection, validation and tracking of working rights on an ongoing basis.

Ingham's Group engage labour hire firms in Australia to provide supplementary labour in our operations. During FY22, we have seen an increase in our reliance on such labour hire providers, attributable to the significantly tightened labour market. Despite this, labour hire did not exceed 7% of our total workforce in FY22. In Queensland, Victoria and South Australia, labour hire workers are provided through appropriately licenced agencies. Our contracts with labour hire providers require that they eliminate modern slavery and make themselves available for periodic audits.



In FY22 Ingham’s Group introduced a program of auditing a representative sample of labour hire and other labour intensive suppliers in known higher risk industries for non-compliance with workplace relations obligations, such as the contract cleaning and road transport industries. These audits proactively support compliance with all relevant workplace and immigration law requirements. These audits are now part of our ongoing process for identifying and eliminating modern slavery. A summary of the effectiveness of these audits is outlined in section 5.

3.2 Risks in our supply chains

Ingham’s Group sources products and services from suppliers ranging from small independent farmers to large multi-nationals, predominantly sourcing from Australia and New Zealand. We are a member of SEDEX (Supplier Ethical Data Exchange) and share information on our performance with our customers.

Ingham’s Group maintains a high ethical standard across its own operations. It is our policy to ensure that the ethical standards that apply within our own sites are also adhered to in our supply chains. The identification of risk within our supply chains is a key initial step to understanding what is required and prioritising subsequent actions. This is discussed in section 3.3.

While Ingham’s Group sources goods and services predominantly from Tier 1 suppliers located in Australia, there are inherent risks further along the supply chains in Tier 2 and Tier 3 suppliers (suppliers or subcontractors to our Tier 2 vendors). An example of this is the uniform requirements at our facilities. While uniform washing services are managed locally in Australia, the garment manufacturing generally occurs overseas where modern slavery risks are identified as a higher risk. Another example is the electronics category which is procured locally in Australia, however tin and tungsten ores used in electronics are mined in the Democratic Republic of the Congo where forced labour has been identified as a risk.

3.3 Risk assessment process

To improve identification of potential modern slavery risks within our supply chains, we engaged third party specialists ‘illion’ and ‘interos’. Illion provides data enrichment services whilst interos provides risk analysis services. The illion enhanced information was analysed by the interos artificial intelligence system to identify our Tier 2 and 3 suppliers, as well as obtain risk scores for our key vendors. The risk factor categories assessed by interos are:

- Finance risk: Soundness, solvency, liquidity and growth
- Cyber risk: Internet disruption and industry profile
- Restrictions risk: Defence and commerce
- Geopolitical risk: Political instability and rules of law
- Operations risk: Natural disaster and pandemic
- ESG risk: Human rights and environmental impact

The outcome of our data enrichment activity provided us with a list of vendors classified based on the Australian and New Zealand Standard Industrial Classification (ANZSIC) and the North American Industry Classification System (NAICS). We have used these classifications to validate and update our internal category records, which are linked to assigned category managers. This provides a complete view of our supply chain to allow for effective management of risk and performance.



For the purposes of modern slavery risk analysis, we used a two-step approach and focused on Tier 2 suppliers. The process firstly identifies countries that are at risk of modern slavery, followed by identification of industries that are at risk of forced labour. These scores are used to identify which Tier 2 suppliers are potentially at risk of modern slavery, and in turn how they relate back to our Tier 1 suppliers.

Country scores that are at risk of modern slavery were obtained from the [Global Slavery Index](#) published by 'Walk Free Foundation' and the scoring and analysis information from interos. Industries that are at risk of forced labour were also obtained using the same sources. We also used scores from attributes under the ESG risk factor from interos for "estimated prevalence of slavery" and "vulnerability of modern slavery" to expand this analysis.

4. Description of our policies, governance and due diligence processes

4.1 For Ingham's Group operations

Ingham's Group has a Code of Conduct which is available on Ingham's Group website and outlines how the business expects its representatives to behave and conduct business in the workplace. It includes legal compliance and guidelines on ethical standards.

Ingham's Group has a Whistleblower Policy which encourages reporting of misconduct including breaches of legislation, criminal activity and unethical behaviour. The Whistleblower Policy enables anonymous reporting as well as the ability to report to an externally and independently managed hotline.

Ingham's Group has a Child Labour Policy which prohibits the employment of child labour in contravention of minimum working age and education attendance requirements across all our operations, which are all located in Australia and New Zealand. The employment of any person under the age of 18 years also requires approval from senior leadership, including consideration of safe work practices and facilitating participation in education.

During FY22, Ingham's Group continued to promote its whistleblower and bullying, harassment and discrimination prevention policies by:

- Refreshing the policy supporting the prevention of bullying, harassment and discrimination.
- Developing new videos to raise awareness of these policies, improve understanding of these matters and the process and avenues available for raising such issues.
- Translating the whistleblower video training into our workforce's most commonly spoken languages other than English, being Arabic, Bengali, Chinese, Hindi, Khmer, Thai and Vietnamese.
- Updating our toolbox talk training guides to equip our leaders to raise awareness of the policies, processes and our people's rights.
- Supporting leaders with reference guides to enable them to effectively and competently respond to workplace grievances and whistleblower complaints, ensuring anonymity where appropriate during the processes and helping them to identify where a complaint is a protected disclosure about potential misconduct or a workplace grievance.
- Through our frontline leadership programs, training our leaders to lead constructively, respond effectively and investigate complaints and grievances.



Recruitment of Australian employees is managed by a centralised recruitment team which operates within an approved framework and in accordance with set procedures. The work rights and visa status of all Australian employees is verified before commencing employment, including verification with the Department of Home Affairs for employees who are not citizens or permanent residents. All employment contracts are issued by the centralised team.

Employees are paid electronically via direct debit in accordance with an electronic time and attendance system. An internal review has indicated that the overall risk of issues that may lead to systemic underpayments is low.

As referenced in section 3.1, during FY22 Ingham's Group introduced a program of auditing third party labour suppliers to proactively identify risks of non-compliance with workplace relations and immigration law obligations. This includes suppliers in the labour hire, contract cleaning and road transport industries. This audit program is ongoing, with a planned focus in FY23 on labour hire, contract cleaning and security services.

Ingham's Group engages an external employment law firm to conduct these audits to identify any serious non-compliance, potential non-compliance or potential improvements to attain best practice. In section 5 we assess the effectiveness of these audits.

4.2 For Ingham's Group supply chains

Ingham's Group Supplier Code of Conduct details our social, environmental and ethical requirements for suppliers of goods and services and was released to all our Tier 1 suppliers. Our Code of Conduct covers the following areas, but is not limited to, labour practices, human rights, business integrity and environment. Human rights requirements have been further detailed through our supplier contracting process. Our standard contract templates have been updated to reflect modern slavery requirements as a key component for suppliers to comply with. As well, the use of artificial intelligence systems such as Interos has improved our visibility into our supply chains and highlighted potential modern slavery risks.

5. Assessment of effectiveness

The following provides a summary of the outcomes of our actions and the assessment of its effectiveness during the FY22 period.

Proactive audits of labour suppliers:

- During FY22, Ingham's Group introduced a program of proactive audits of third-party labour suppliers in higher risk industries to identify serious non-compliance, potential non-compliance or potential improvements to attain best practice. The audits completed during FY22 did not identify any instances of modern slavery. Where risks or actual non-compliance of other workplace relations matters were identified, we worked with those suppliers to rectify and improve their processes.
- Three audits were completed for suppliers in labour hire, road transport and contract cleaning services. The results are as follows:



Table 1: Summary of the audit outcomes

Supplier industry	Labour hire	Road transport	Cleaning services
Risks of serious non-compliance identified in audit	Yes	Yes	No
Risks of potential non-compliance identified in audit	No	Yes	No
Status of risks identified	Resolved	Resolved	N/A

- Resolving non-compliance:
 - Labour hire: The non-compliance identified related to incorrect award application by the labour hire suppliers. This was resolved by the supplier completing a full audit and rectifying the underpayments. This process was completed in June 2022 by the supplier.
 - Road transport: The non-compliance identified related to incorrect award application by the road transport provider. This was resolved by the supplier completing a full back payment of the correct award rates. This was completed in September 2021 by the supplier.

Whistleblower and prevention of bullying, harassment and discrimination programs:

- The updated leader reference guides, training videos and policies were delivered during FY22 and were made available on an ongoing basis on our internal communications channel, Workplace, which is accessible to every employee.
- The promotion and education of our policies resulted in greater awareness of these processes amongst our people and an increase in reports through the whistleblower avenues and reports under our bullying, harassment and discrimination policy compared to the prior financial year.
- None of the reported matters amounted to misconduct as defined in the Corporations Act or Modern Slavery Act.
- We saw an increase in reporting of 5% from FY21 to FY22 across all matters reported internally including bullying, harassment, inappropriate behaviour, sexual harassment, discrimination or other misconduct.
- Across FY22, we saw a total of 18 complaints made via the whistleblower process, which is an increase from FY21, reflecting our focus on awareness training and accessibility in FY22.

We are committed to continually improving our processes to effect positive change to proactively manage modern slavery risks in our supply chains. This is supported by our supplier relationship management program to manage the medium to high risk suppliers.



6. Consultation, collaboration and engagement

Key Ingham's Group management personnel that represent Sustainability, Risk, Legal, Procurement and Supply Chain, People and Performance, Compliance, and Internal Audit functions of Ingham's Group and its Reporting Entities (Appendix 1) have collaborated in the preparation of this Statement.

Externally, we work with supply chain partners, labour providers, customers, industry bodies and other enforcement bodies to ensure the risk of modern slavery is minimised. Ingham's Group has consulted with its Reporting Entities, including the New Zealand business and updated its standard contract templates to reflect the requirements of the Modern Slavery Act.

7. Approval by Principle Governing Body

The Principle Governing Body of Inghams Group Limited is the Ingham's Group Board, which has been consulted on and has considered and approved this Statement.

Each of the other Reporting Entities is a wholly owned subsidiary of Inghams Group Limited and is managed by the senior management team of Inghams Group Limited.

The Chief Executive Officer and Managing Director of Inghams Group Limited and the Chief Financial Officer of Inghams Group Limited are Directors of each of the subsidiary Reporting Entities. The Chief Executive Officer and Managing Director, the Chief Financial Officer, and the senior management team are responsible for managing each of the subsidiary Reporting Entities and have been consulted on, and have considered and approved, this Statement.



Appendix 1

Reporting Entities – Inghams Group Limited Modern Slavery Statement

Reporting Entity	ACN	Location
1. Inghams Group Limited	ACN 162 709 506	*Australia
2. Ingham Holdings II Pty Limited	ACN 162 709 579	*Australia
3. Ingham Holdings III Pty Limited	ACN 162 709 659	*Australia
4. Adams Bidco Pty Limited	ACN 162 707 904	*Australia
5. Ingham Enterprises Pty Limited	ACN 130 793 609	*Australia
6. Inghams Enterprises Pty. Limited	ACN 008 447 345	*Australia
7. Inghams Enterprises (NZ) Pty Limited	ACN 003 853 558	**NZ / Australia

* All operations in Australia. Registered office and Level 4 / 1 Julius Avenue, North Ryde, Sydney NSW 2113, Australia

** Operations in New Zealand. Registered Office at 624 Waiheke Road, RD1, Waitoa, 3380, New Zealand

