

# Contents

(1)	Joi	nt Reporting	3
(2)	CEC	O Message	4
(3)	Our	Commitment	5
(4)	Abo	out our Group and Our Values	6
(5)	Our	Beliefs and Our Mission	7
(6)	Str	ucture, Operations and Supply Chains	
	(i)	Structure	8
	(ii)	Operations	9
	(iii)	Business Unit Profiles	10
	(iv)	Stakeholders and Management	13
	Responsibility		
	(v)	Modern Slavery Steering Group	14
	(v)	Supply Chain	15
	(vi)	Policies and Procedures	16
	(vii)	Strategy & Approach	17

(7)	Modern Slavery Risks in Operations and Supply Chains	18
(8)	Actions Taken to Assess and Address the Risks	19
(9)	Modern Slavery Audits	21
(10)	Assessing the effectiveness of actions taken	24
(11)	External Collaboration	25
(12)	Activities Planned for 2024	26
(13)	Mandatory Criteria Reporting Matrix	27
(14)	Reporting Entities	28
(15)	Execution	29





This joint modern slavery statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) by Baybrick Pty Ltd (ACN 067 220 0170) ("the Company") on behalf of itself and its reporting entity subsidiaries for the financial year ending 31 December 2023. In order to prepare this joint statement, the Company consulted with each of the reporting entities covered by this statement.

The Company and all of its reporting entities are referred to in this statement as "the Group" and these entities are listed on page 28 of this statement.

## **CEO** Message

# JBS Australia is at the forefront of animal protein food manufacturing that reaches tables across Australia and the world.

The journey of our products from farm to fork comprises a vast network of suppliers and partners. It is a journey we are committed to ensuring is ethically sound, transparent, and respectful of human rights.

As a leading company in the food industry, we acknowledge our responsibility to ensure the integrity of our products and the welfare of those who bring these products to life. Navigating through the complexities of the global supply chain is imperative and we remain vigilant and proactive in addressing the serious issue of modern slavery.

Our Modern Slavery Statement outlines the steps we are taking to assess and manage risks related to modern slavery in our operations and supply chain. It reflects our ongoing efforts to implement rigorous due diligence processes, enhance supplier engagement and compliance, and foster a culture of ethical business conduct across all levels of our organisation.

This document outlines our comprehensive approach to identifying, preventing, and addressing any instances of modern slavery within our sphere of influence, as well as meeting the intent of the Australian Modern Slavery Act 2018 (Cth).

Our strategic approach encompasses organisational awareness, risk assessment, supply chain mapping, community engagement, remedial action and supplier contingency planning and is underpinned by supply chain transparency, risk assessment and due diligence, training and awareness and collaboration and advocacy.



As part of a more hands-on approach to identifying modern slavery risks, modern slavery audits were conducted in 2023 on key high-risk service supply areas. 2023 also saw the SEDEX platform being further integrated into the risk management of modern slavery; supplemented with SMETA Audits where it was deemed appropriate and agreed with suppliers. Fair Supply was also used to conduct detailed due diligence on suppliers to better understand and address the risks in our supply chain.

Our Modern Slavery Statement is a living document that will continue to evolve as we learn, grow, and adapt to the ever-changing landscape of global business and human rights challenges. It is a testament to our belief that business must be a force for good, contributing to a world where dignity, freedom, and justice are rights afforded to all.

I invite you to read our statement in full and join us in this critical journey towards more ethical and sustainable business practices.

#### **Brent Eastwood**

CEO JBS Australia



## **Our Commitment**

The Group opposes all forms of slavery and forced labour in its operations and the operations of its suppliers.

We are committed to improving our practices to combat modern slavery and we will continue our critical work of feeding the world.





## **About JBS Australia**

#### **About Our Group**

Our Group is Australia's largest meat and food processor with a strong portfolio of leading beef, lamb, pork and fish products together with a range of smallgoods and value-added branded products.

The Group is a major supplier of animal protein to Australia and the world, providing strong local employment, career opportunities and export dollars for the Australian economy.

We source products, services and inputs from Australia and around the world to support our food production business.





#### **About JBS Australia** Cont.

#### **Our Mission**

To be the best in what we do, completely focused on our business, ensuring the best products and services to our customers, a relationship of trust with our suppliers, profitability for our shareholders and the opportunity of a better future for all of our team members.

#### **Our Beliefs**

- Focus on the details
- A hands-on approach
- Success is only achieved through hard work
- The right people in the right place
- Passion for what we do
- Actions and behaviour are more important than knowledge
- A leader must win over their team members
- Lead by example
- Focus on results
- Working with people who are better than us
- Believing makes the difference
- Quality products





#### Structure

The Group is comprised of private companies controlled or majority owned by JBS S.A., a company incorporated and listed in Brazil.

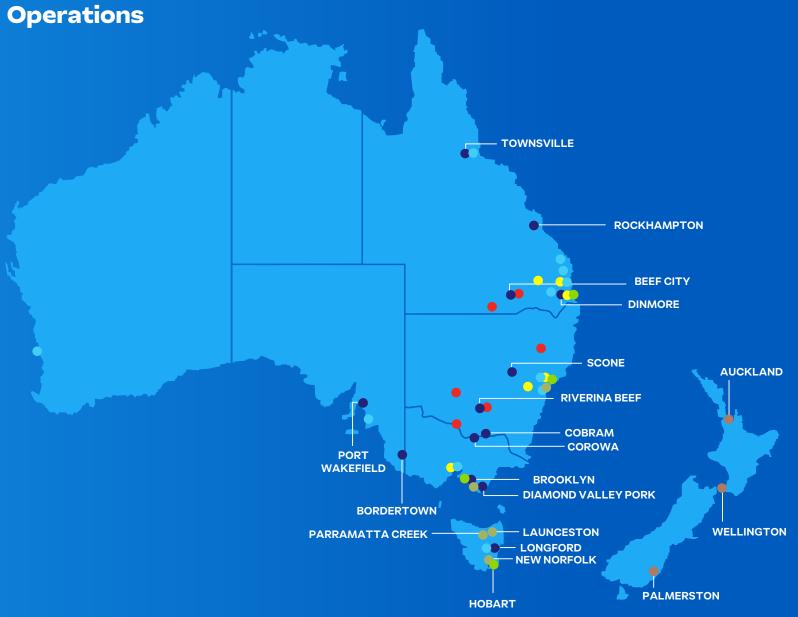
#### The Group includes:

- Andrews Meat Industries Pty Ltd JBS Australia Finance Pty Ltd
- Australian Consolidated Food Holdings Pty Ltd
- Baybrick Pty Ltd
- Diamond Valley Pork Pty Ltd
- Huon Aquaculture Group Pty Ltd Rivalea Holdings Pty Ltd
- Huon Aquaculture Company Pty Ltd
- Industry Park Pty Ltd
- JBS Aquaculture Pty Ltd
- JBS Australia Pty Ltd

- JBS Australia Finance 1 Pty Ltd
- Premier Beehive Holdco Pty Ltd
- Primo Foods Pty Ltd
- Rivalea (Australia) Pty Ltd
- White Stripe Foods Pty Ltd

The main activities of the Group take place in Australia and New Zealand where the Group employs approximately 14,000 team members with a diverse range of skills.





- Processing Plants
  - Feedlots
- Value add
- Distribution
- Corporate
- Huon Aquaculture
  Facilities (excl.
  hatcheries, nursery)
- Beehive





#### **Business Unit Profiles**

#### **JBS Australia Northern**

The company's Northern Division operates five strategically placed processing facilities as well as five feedlots across Queensland and New South Wales with access to an extensive network of quality cattle. The Northern Division services both domestic and international markets, exporting ~85% of its finished goods or commodity products to more than 50 countries around the world.



#### Geographies:

Australia



**Facilities:** 

5



Feedlots:

5



**Processing Capacity:** 

~7,000 cattle/day



Employees: 4.800+

#### **JBS Australia Southern**

The company's Southern Division produces a range of high-quality beef and lamb products through five beef and lamb processing facilities and one feedlot located across New South Wales, Victoria, Tasmania and South Australia. Its value-added business, which produces a variety of retail ready products in a range of formats, is tailored to individual customer requirements.



**Geographies:** 

Australia



Facilities:



Feedlots:

**Processing Capacity:** 

~3,050 cattle/day

~15,200 small stock/day



**Employees:** 

#### **Business Unit Profiles Cont.**

#### **JBS Australia Pork**

JBS Australia supplies Australians with high quality pork, including value-added pork products. In 2021, the business expanded its operations into the breeding, growing, fattening, and finishing of pigs through its acquisition of Rivalea, a leading vertically integrated pork producer and processor with operations in both New South Wales and Victoria. The Pork Division comprises Diamond Valley Pork, Seven Point Pork & Rivalea.



#### **Geographies:**



Facilities:



**Piggeries:** 



**Processing Capacity:** ~9,000 hogs/day



**Employees:** 1.470+

#### **Primo Foods**

Primo Foods is Australia's most significant manufacturer of ham, bacon, salami, and deli meats, supplying quality smallgoods to major retail and food service groups across Australia and New Zealand. Primo is unique for owning and operating manufacturing plants, packing facilities and distribution warehouses, allowing it to maintain uncompromising levels of quality control.



#### **Geographies:**

Australia and New Zealand



Facilities:



**Processing Capacity:** 

~140,000 T of meat



**Employees:** 3.340+

#### **Huon Aquaculture**

Based in Tasmania, Huon Aquaculture is a significant contributor to Australia's Atlantic Salmon production. Huon Aquaculture is a leader in the Tasmanian marine farming industry with a focus on high-quality products and innovative aquaculture practices.



#### Geographies:

Australia



Facilities:



**Nurseries:** 



Hatcheries:



**Processing Capacity:** 





**Employees:** 

#### **Andrews Meat Industries**

Andrews Meat Industries (AMI) is one of Australia's longest serving and most respected suppliers of protein-based solutions across three key divisions: foodservice, value added (cooked), and export. Andrews is a leader in portion control and value-added meats for the food service industry, currently producing ready-to-serve meals and sous vide meat options for major retail stores and food service clients under the Creative Food Solutions brand.



#### **Geographies:**



**Facilities:** 



**Processing Capacity:** 



**Employees:** 















#### **Business Unit Profiles Cont.**

#### **D.R. Johnston**

As JBS Australia's domestic wholesale division, D.R. Johnston's core business is distributing fresh and frozen carton meat to butcher shops, independent supermarkets, and food service Australia wide. It also operates retail outlets.



**Geographies:**Australia



Facilities:



**Employees:** 90+

#### **JBS Aust Carriers**

The transportation division of JBS Australia, Carriers supports operations through an efficient logistical structure that transports cattle, shipping containers, bulk products in tippers, and palletized refrigerated products. Its fleet includes 42 prime movers and more than 100 trailers that travel a combined 7 million km per year.



**Geographies:** Australia



Transportation Terminals:





Fleet Size: 42 Prime movers 100+ trailers



Employees: 65+

### White Stripe Foods

White Stripe Foods has a long-standing history of supplying quality centre of the plate cuisine to leading hotels, restaurants, food service distributors, retailers, caterers, manufacturers, and butchers across the globe. White Stripe Foods supplies high-quality beef, lamb, veal and seafood programs.



Geographies:



Facilities:



Employees:

### Knox International

Established in 1984, Knox International has grown to become one of the leading processors and exporters of Australian sheep and lamb skins. Knox works closely with the JBS Australia plants located in Victoria and South Australia as well as other third-party suppliers.



Geographies:



Facilities:



Processing Capacity:

~15,000 sheepskins/day



**Employees:** 25+

#### **Swift**

Swift and Company Trade Group comprising the Meat and By-Products units is the international trading division of JBS Australia which has, for over 50 years, been supplying international markets with meat products and protein by-products from a range of species, domestic and global suppliers.



Geographies:



Facilities:



Employees: 35+





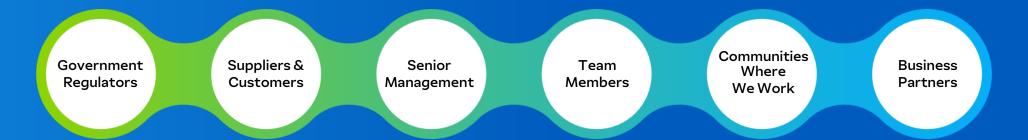








## **Stakeholders**



## **Management Responsibility**





## Modern Slavery Steering Group

In 2023, the Modern Slavery Steering Group expanded to include representation from all Australian-based Business Units.

This expansion occurred to increase collaboration and coordination across business units on the identification and implementation of recommendations from Modern Slavery Risk Assessments in a timely manner. The expansion signified the growing commercial awareness of the modern slavery risk across the Group.







## **Supply Chain**

## The Group's supply chain has an extensive domestic and international footprint. Suppliers to the Group are diverse.

Examples include:

- Farmers and operators of feedlots
- Suppliers of meat and by-products
- Suppliers of grain and animal feed
- Suppliers of fishmeal and fish feed
- Suppliers of spices and flavourings
- Suppliers of chemicals
- Domestic and international suppliers of land and maritime transportation and logistics services
- Service providers provide us with:
  - Recruiting and labour solutions, including labour sourced under the Pacific Australia Labour Mobility (PALM) program.
  - Cleaning, security, maintenance and construction
  - Engineering, IT, marketing, health and other professional support services
  - Cold storage

The majority of suppliers in the Group's direct supply chain (by spend) are incorporated in Australia or have operations here.

On occasion, services (for example, IT and recruitment) are delivered offshore. Some products such as packaging, production equipment, ICT hardware, logistics and pork can be produced overseas.

The Group engages with suppliers through different forms of contracts, ranging from one-off, short-term contracts to long term umbrella arrangements.

The Group holds certifications across several sectors.

#### **Policies & Procedures**

In 2023, policies and procedures were reviewed to ensure clarity on how modern slavery should be reported and handled within the Group.

#### **JBS Modern Slavery Policy and Procedures**



#### Supplier Code of Conduct

JBS suppliers are required to:

- Comply with the United Nations Principles on Business and Human Rights and the 10 principles of the United Nations Global Compact
- Comply with core International Labour Organization (ILO) conventions

The document is publicly available <u>here</u>.



#### Global Code of Conduct and Ethics

- JBS forbids the use of child or forced labour
- Ethics Line, a grievance and complaints mechanism available 24/7 for whistleblowing and other complaints, with the option of making such complaints anonymously

The document is publicly available <u>here</u>.



#### Social Responsibility Policy

- Modern slavery
- Human rights in the supply chain
- Child labour, forced or compulsory labour
- Ethical Trading Initiative (ETI) Base Code

The document is publicly available <u>here</u>.



#### Procedure for Addressing Modern Slavery in the JBS Australia Supply Chain

Procedure for responding to modern slavery in:

- Group facilities
- A supplier's operations in Australia
- Offshore in the global supply chain

This is an internal document.



## Strategy & Approach

JBS Modern Slavery Strategy and Road Map 2023 – 2025.

In 2022, the Group developed its JBS Modern Slavery Strategy and Road Map 2023 – 2025.

The Group has been using the strategy to guide activities to build sustainable structures and processes to reduce the modern slavery risks in operations and in the supply chain.

#### Organisational Awareness

JBS Australia team members are made aware of modern slavery risks in the workplace and supply chain.

#### Risk Assessment

Business units have the capacity to produce evidence-based modern slavery risk assessments on high risk suppliers, commodities and services.

#### Supply Chain Mapping

JBS Australia works with suppliers to map modern slavery risks in the supply chain.



## Community Engagement

JBS Australia works with businesses and community groups against modern slavery.

#### Remedial Action

JBS Australia uses its leverage as a customer to ensure action against slavery in the operations of suppliers.

## Supplier Contingency Planning

JBS Australia identifies alternative critical suppliers to be mobilised if unacceptable modern slavery practices are identified in current suppliers.



## Modern Slavery risks in operations and supply chains

In 2023, the Group followed up on modern slavery risks identified during the previous reporting period in 2022 and continued to review its processes. As part of these efforts, enhanced due diligence activities were conducted on high-risk suppliers.

As part of a more hands-on approach to identifying modern slavery risks, modern slavery audits were conducted on three service suppliers i.e. two labour hire providers and one cleaning contractor.

Several modern slavery risks that were identified in the previous reporting period continued to be relevant in 2023. These risks continued to be subject to further assessment and monitoring.

In addition, based on reports and engagement with various stakeholders both within the Group and externally, salient modern slavery risks that required further assessment were identified. These were not areas of suspected or actual modern slavery per se but instead were identified as areas of higher risk. This included the following areas:

- International labour hire providers Philippines, China
- Dehydrated tomatoes China
- Seafood Chile
- Offshore ICT Support Services Philippines
- Fish feed Peru, India and Oman





#### Actions taken to address and assess the risks

#### International Labour hire - Philippines, China

- Enhanced due diligence checks were conducted on seven labour hire suppliers that supply the Group with workers from the Philippines and China. These labour hire suppliers were selected on the basis that they carry a higher risk of modern slavery.
- Specific to the Philippines, the prevalence of companies offering loans for Overseas Filipino Workers (OFWs) was identified as a serious modern slavery risk. OFW loans generally cover placement fees, international travel, and cost of living expenses. In this regard, there is a risk of candidates being exploited via debt bondage and potentially unable to repay the OFW loan with the wage that they earn in Australia.
- The Group is aware of such practices and has continued to remind international labour hire providers on this specific risk and the standards that the Group expects when supplying its workforce. The Group has identified international labour hire providers as a group of suppliers that should be required to join the SEDEX platform and share their SEDEX Self-Assessment Questionnaire (SAQ) with the Group. In addition, the Group conducts its own due diligence measures to assess and address the exposure to this risk.

#### Dehydrated tomatoes - China

- Some of the meat products that the Group produces are prepared with flavourings and tomato-based products are often used in such flavourings.
- An Australian-based Tier 1 supplier
   of dehydrated tomatoes was assessed
   as a high-risk supplier after it confirmed
   that it sources tomatoes and its
   derivative products from China.
   Tomato production in China carries the
   risk of modern slavery, especially if
   grown in certain areas in the country.
- The Tier 1 supplier had earlier signed the JBS Australia Group Supplier Code of Conduct, which requires suppliers to acknowledge the Group's zerotolerance of modern slavery. To further address this risk, the Group is engaging with the Tier 1 supplier to address the potential risk of modern slavery.





#### Actions taken to address and assess the risks Cont.

#### Seafood - Chile

- According to the 2023 Global Slavery Index by Walk Free, Chile has the third lowest prevalence of modern slavery in the Americas after Canada and Uruguay. However, in the independent third-party assessment that the Group commissioned Fair Supply to conduct in 2023, seafood providers from Chile were identified as a key risk area for the Group and dominated the top 20 high-risk suppliers.
- Following the Fair Supply assessment, the Group has been working with internal stakeholders and has also spoken with suppliers in Chile to address and remediate this risk. Due diligence measures continue to assess and address this risk. In particular, the potential exposure to illegal, unreported, and unregulated (IUU) fishing, which at times uses forced or debt-bonded labour from Chile and neighbouring Peru is being assessed.

#### Offshore ICT Support Services – Philippines

- During the reporting period, due diligence checks were conducted on an offshore provider of information and communications technology (ICT) support services based in the Philippines. The checks were conducted prior to the supplier being engaged in a commercial relationship with the Group.
- No evidence of modern slavery or worker exploitation was identified in the offshore provider for ICT services.

#### Fish Feed – Peru, India and Oman

- A major supplier of fish feed based in Australia was identified in the Group's previous Modern Slavery Statement as being a high-risk supplier. In 2023, the Group collaborated closely with the supplier to assess and address potential modern slavery risks. This included examining the suppliers supply chain in Peru, India, and Oman. The Group was provided access to nine Tier 2 supplier details and conducted due diligence checks on these companies.
- Out of the nine Tier 2 suppliers, three
   Tier 2 suppliers were found to have a
   higher risk due to: (i) factory conditions;
   and (ii) the use of seasonal migrant
   workers as seafarers.
- Via this process of close collaboration and engagement, the major supplier of fish feed conducted follow-up activities with its Tier 2 suppliers as a measure to reduce the risk of workers in their supply chain being at risk of modern slavery or exploitation.





## **Modern Slavery Audits**

#### **SEDEX and SMETA Audits**

In 2023, SMETA (Sedex Members Ethical Trade Audit) audits were conducted at the majority of the Group's sites. The SMETA standard is designed to be aligned with the Ethical Trading Initiative (ETI) Base Code, and covers human rights, modern slavery, labour standards, business ethics, health and safety and environmental practices. The SMETA audits that were conducted during the reporting period did not raise any findings that amounted to modern slavery or forced labour practices at any of the Group's sites.

The Group also requested suppliers, especially its larger and higher risk Tier 1 suppliers, to join SEDEX. This helps the Group to assess a supplier's social and ethical standards and the potential risk exposure to modern slavery that the supplier may possess.

With more suppliers completing and sharing with the Group the SEDEX Self-Assessment Questionnaire (SAQ), which includes questions on human rights and modern slavery issues, the Group is better placed to continue to manage modern slavery risks, including engaging with suppliers on remediation steps and considering if a more formal audit is necessary.





### **Modern Slavery Audits** Cont.

#### **Unannounced Internal Audits**

In February 2023, the Group's *Risk and Compliance Officer – Modern Slavery* conducted unannounced modern slavery audits on two suppliers at a site in South Australia. Cleaning and labour hire providers were selected for these audits on the basis that these sectors are deemed higher risk. There have been several well publicised cases of modern slavery in these sectors in Australia.

Workers from both of these sectors were asked to respond to questions on their recruitment, conditions, freedom of movement, and access to identity documents and wages.

The cleaning supplier complied with the Group's requests and supported the audit. No evidence of worker exploitation was identified amongst the sample of workers chosen.

In relation to the labour hire provider, a sample of workers were selected and asked similar questions. This included questions on the manner of their recruitment and whether there were any exploitative conditions to their employment that may have been indicative of modern slavery.

None of the workers from either sector raised or appeared to have experienced any form of forced labour or modern slavery during their employment or recruitment.





## Modern Slavery Audits Cont.

#### Other Social Audits

Workers sourced through the Pacific Australia Labour Mobility (PALM) program are managed in accordance with the requirements of the Pacific Labour Forum (PLF) on behalf of the Department of Foreign Affairs and Trade (DFAT) and Department of Home Affairs (DHA). This includes unannounced on-site audits and desktop audits.

The Group is also subject to other social and ethical audits conducted by, or on behalf of, our key customers. These audits also assess modern slavery risks.





## **Assessing the Effectiveness of Action Taken**



We are monitoring the effectiveness of the processes and procedures to address the modern slavery risks in connection with our business, in line with the Modern Slavery Act 2018 (Cth) and relevant international standards. We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by:

- a) tracking our actions and outcomes;
- b) partnering with suppliers and other external partners (including third-party independent auditors); and
- c) undertaking regular internal governance and external assurance processes.

Based on the results of these processes, we will adapt and strengthen our actions to continually improve our response to modern slavery, including amending our strategy and approach to managing such risks where necessary.

#### Internal Consultation

This Modern Slavery Statement covers each Reporting Entity, following an active engagement and consultation process with the Modern Slavery Steering Committee and the executive leadership team of each Reporting Entity. This process included consideration and discussion of the reporting requirements, actions to address these requirements and identifying emerging modern slavery risks relevant to the Group.

The Modern Slavery Steering Committee includes representatives from Legal, Compliance, Sustainability, Risk, Procurement, Corporate and Regulatory Affairs, as well as representatives from the business from each Reporting Entity.

A copy of this 2023 Modern Slavery Statement was provided to each entity owned and controlled by the Company.



#### **External Collaboration**

The Group also conducted community engagement on modern slavery at a site and met with local government officials and the manager of the local migrant support organisation.

#### Challenges

As with the previous reporting period, a key challenge has been the unwillingness of suppliers to accept the invitation to join SEDEX, the Group's nominated supply chain ethics and compliance platform.

The Group has been persistent with its approach to high-risk suppliers and is working with them to encourage the completion of questionnaires and provision of information. Where we are unsuccessful in receiving information, deep dives into the suppliers' operations are undertaken.







#### **Activities Planned for 2024**

- Fair Supply will be engaged, as in 2023, to conduct a risk assessment and confirm the Group's high-risk suppliers.
- Enhanced due diligence activities will be conducted on high-risk suppliers identified in the Fair Supply assessment.
- Group staff involved in purchasing and procurement activities will undergo tailored modern slavery awareness training focused on risks in the supply chain.
- Whistleblower Policy and procedures to be reviewed and revised to help ensure further clarity and accessibility of this policy and the whistleblowing mechanism itself.

## **Mandatory Criteria Reporting Matrix**

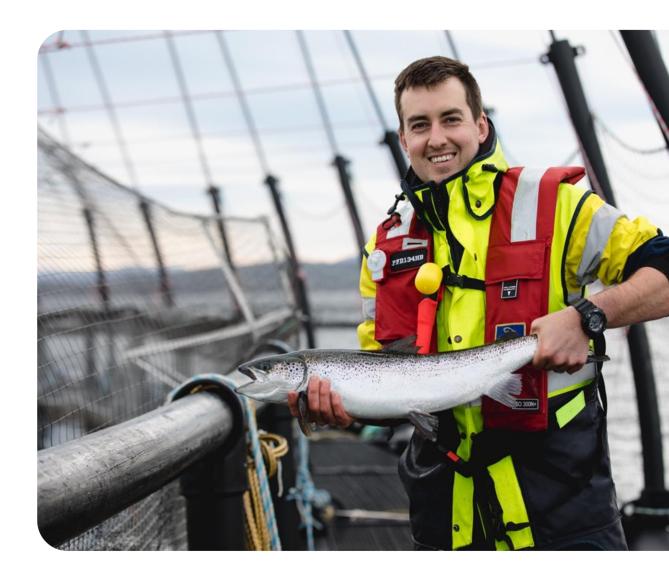
Criterion	Mandatory Criteria	Page Reference
1	Identify the reporting entity.	3, 28, 29
2	Describe the reporting entity's structure, operations and supply chains.	8 - 15
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	18
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.	19 – 23
5	Describe how the reporting entity assesses the effectiveness of these actions.	21 – 24
6	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	14, 17, 24



## **Reporting Entities**

The following Group entities are considered reporting entities under the Modern Slavery Act 2018 (Cth), and this statement has been approved by the Board of Directors of each of these companies:

Andrews Meat Industries Pty Ltd	14 June 2024
Australian Consolidated Food Holdings Pty Ltd	13 June 2024
Baybrick Pty Ltd	16 June 2024
Diamond Valley Pork Pty Ltd	15 June 2024
Huon Aquaculture Company Pty Ltd	13 June 2024
Huon Aquaculture Group Pty Ltd	13 June 2024
Industry Park Pty Ltd	13 June 2024
JBS Aquaculture Pty Ltd	13 June 2024
JBS Australia Finance 1 Pty Ltd	17 June 2024
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Rivalea (Australia) Pty Ltd	16 June 2024
Rivalea Holdings Pty Ltd	16 June 2024
White Stripe Foods Pty Ltd	17 June 2024





MATTHEW LYNE DIRECTOR

Matt lyne

DATE: 17th June 2024



Corporate Office 62 McRoyle Street Wacol QLD 4078

JBS Australia Modern Slavery Statement