

Modern Slavery Statement

For the financial year ending 30 June 2024



HARVEST
— R O A D —

Harvest Road Group Pty Ltd



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Summary of Our Response to the Modern Slavery Act 2018 (cth)

Criteria	Description	Reference in this Statement
Identify the reporting entity (S16 (1) (a)).	Harvest Road Group Pty Ltd.	Approval & Our Structure – page 7.
Describe the structure, operations and supply chains of the reporting entity (s16 (1) (a) – (b)).	Harvest Road Group is an Australian agrifoods business that produces high-quality food sold under the Harvey Beef, Leeuwin Coast and other associated brands for domestic and international markets. Our products are exported to more than 30 different countries. The company is owned by Tattarang Pty Ltd.	Approval & Our Structure – page 7. Our Operations & Supply Chains – page 9.
Describe the risk of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls (s16 (1) (c)).	Harvest Road Group has identified the following modern slavery risks in its operations and supply chains: <ul style="list-style-type: none">• Australian beef cattle supply chain.• Seasonal and migrant workers.• Solar panel, uniforms and electronics procurement.	Our Modern Slavery Risks (Supply Chain Risks & Operational Risks) – Page 12 to 13.
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes (s16 (1)(d)).	Modern slavery screening processes for new and existing suppliers consisted of: <ul style="list-style-type: none">• Issuing Self-Assessment Questionnaires (SAQs) to high risk suppliers.• Engaged with suppliers to ensure issues are understood and to drive continual improvement.• Undertook an internal audit on the recruitment process for migrant workers.• Incorporated modern slavery considerations in terms and request for proposals.• Provided employees with internal education and modern slavery training.	Risk Management & Assessment – page 17. Supplier Engagement, Corrective Action & Remedy – page 18. Due Diligence & Actions Undertaken – page 18.

Criteria	Description	Reference in this Statement
Describe how the reporting entity assesses the effectiveness of such action (s16 (1) (e)).	To ensure consistency between reporting periods, progress against our commitments are set out in the 'measuring effectiveness framework' and our 'future commitments' provide a clear roadmap for the next reporting period.	Measuring Effectiveness and Our Future Commitments – Page 25.
Describe the process of consultation with any entities that the reporting entity owns or controls (s16 (1) (f)).	Engagement across all entities for consistent modern slavery approach, including oversight by the Board of Directors and Chief Executive Officer.	Approval & Our Structure – Page 7. Consultation with Owned & Controlled Entities – page 27.



Introduction

Harvest Road Group is proud to present our third Modern Slavery Statement.

We continue our journey with our commitment to continuous improvement in addressing modern slavery risks in our agriculture, aquaculture and beef processing operations and supply chains. Inherent risks of modern slavery are dynamic and require us to continually strengthen our existing mitigation strategies and to identify new opportunities in addressing these issues.

The due diligence undertaken this year in our high risk areas for uniform suppliers and seasonal labour hire was performed with best practice processes and demonstrates our commitment to proactively addressing the risks of modern slavery and our active engagement with our suppliers.

In last year's statement, we outlined areas of focus to address for this reporting period and I am pleased with our progress and we will be focused on delivering further development through FY25.

We look to the next reporting period with a pledge to increasing collaboration with our suppliers, operational stakeholders and partners to heighten transparency and traceability to address modern slavery risks in our day to day at Harvest Road.

Tim Wood
CEO, Harvest Road Group

Identify the Reporting Entity

Approval & Our Structure

This Modern Slavery Statement ("**Statement**") is published on behalf of Harvest Road Group Pty Ltd (ACN 169 138 014) and its owned and controlled entities (referred to collectively in this Statement as "**we**", "**us**", "**our**" and "**Harvest Road Group**", unless the context requires differentiation of individual entities), to meet the reporting requirements under the Modern Slavery Act 2018 (Cth) ("the **Act**") for the year ended 30 June 2024.

Harvest Road Group's wholly owned subsidiary Harvey Industries Group Pty Ltd (ACN 117 597 985) individually met the Act's annual revenue threshold for the reporting period (FY23-24). Accordingly, this is a joint Statement on behalf of two reporting entities: Harvest Road Group Pty Ltd and Harvey Industries Group Pty Ltd.

This joint Statement sets out details of operations across Harvest Road Group, its supply chains, and measures taken to address risks of modern slavery in line with the Commonwealth Guidance for Reporting Entities.

This Statement addresses the activities of Harvest Road Group Pty Ltd, Harvey Industries Group Pty Ltd and other controlled entities which sit within Harvest Road Group but are not reporting entities in their own right. These controlled entities include:

- Harvest Road Pastoral Pty Ltd (ACN 619 252 621)
- Harvest Road Breeding Pty Ltd (ABN 75 655 624 212)
- Koojan Downs Pty Ltd (ACN 628 244 628)
- Harvest Road Oceans Pty Ltd (ACN 165 170 445)
- Harvest Road Management Services Pty Ltd (ACN 652 232 847)

Consultation and engagement across Harvest Road Group has occurred in the preparation of this Statement, as well as in relation to Harvest Road Group's modern slavery response in general. This involved communications with key representatives from the Harvest Road Group's business operations and leadership team.

The Board's of Harvest Road Group Pty Ltd and Harvey Industries Group Pty Ltd approved this Statement on 20 December 2024.

This Statement is signed by John Hartman, who is a director of both reporting entities covered by this joint Statement pursuant to section 14(2)(e) of the Act.



John Hartman
Director, Harvest Road Group Pty Ltd
Director, Harvey Industries Group Pty Ltd

You can download last year's Modern Slavery Statement [here](#)

Our Values and Commitment to Ending Modern Slavery

At Harvest Road Group, our 10 values are at the heart of everything we do. They drive our culture and philosophy and underpin our approach to conducting business.

We remain committed to acting ethically and with integrity across all aspects of our business. We strive to uphold and protect the rights of all of those who work for, and on behalf of the Harvest Road Group. We are also committed to protecting and respecting the rights of people who may be impacted by our activities, including those in our supply chains.

We continue to acknowledge the risk of modern slavery occurring in our own operations and supply chain and are focused on implementing and continuously improving effective systems and processes to address these risks.

Our Values

Courage & Determination

NEGU – we never ever give up

Generating Ideas

Always be on the lookout for breakthroughs

Empowerment

Go to your leader for advice, not permission

Humility

Be vulnerable, take risks to trust others

Enthusiasm

Be the most positive person in the room

Integrity

Do what you say you're going to do

Family

Support each other, always be kind

Safety

Look out for your mates and yourself

Frugality

Think of ways we can do things better, faster, cheaper, safer

Stretch targets

Always be uncomfortable with your level of challenge

Our Operations and Supply Chains

Who We Are

Harvest Road Group is an Australian agrifood business, with operations comprising of cattle production, beef processing, horticulture and aquaculture. Harvest Road Group's vision is to deliver Australia's best sustainable produce to the world. We strive to make a positive impact on our people, communities and partners.

Our Operations

Agribusiness

Our Agribusiness manages cattle breeding, backgrounding and feeding operations across six pastoral aggregations, three farming properties and a feedlot – spanning the Kimberley, Pilbara, Gascoyne and Midwest regions of Western Australia. In addition, we have a horticulture business based near Carnarvon. Our Agribusinesses' operations are highly seasonal and in addition to our full time workforce we also utilise seasonal workers and contractors during peak periods throughout the year.

Beef processing

Our beef processing facility in Harvey is located 140km south of Perth. We procure livestock from a network of suppliers spanning Western Australia including from our own Agribusiness. Our workforce comprises over 800 employees, including skilled migrant workers from the Pacific Islands who are employed under the Pacific Australia Labour Mobility (PALM) Scheme.

We have a dedicated procurement team responsible for coordinating and sourcing for the beef processing facility, including engineering parts, uniforms, and packaging.

Our beef products are sold domestically and internationally, exported to over 30 different countries.

Aquaculture

Our aquaculture leases are based off the coast of Albany, 450km south of Perth. The aquaculture operations span nursery, spat deployment, on-water grow out, harvesting and grading. Our aquaculture products are primarily sold domestically.

Major procurement categories within the aquaculture business include construction services and materials, plant and equipment, water farming infrastructure (baskets, buoys, ropes and anchors etc) and third party processing services.



Our Employees

During this reporting period, Harvest Road Group employed a total of 1,603 people.

The breakdown of employment types is set out below. It included 1,062 full-time employees (comprising 66% of all employees), 25 part-time employees, 28 fixed term contracted employees and 488 casual staff. The table below details the employment type and the employing entity.

All our staff are employed in strict compliance with local laws and regulations. Our Australian terms and conditions of employment are underpinned by the Fair Work Act 2009 (Cth) and the National Employment Standards (NES).

In relation to the contracted labour hire workers, we ensure strict compliance with the NES. For example, the following minimum terms are set out in all employee and labour hire worker contracts and communicated clearly:

- Hours of work;
- Remuneration;
- Leave entitlements, including annual leave, public holidays, parental leave, compassionate leave, personal/carer's leave, community leave, jury service leave, family and domestic violence leave;
- Benefits; and
- Notice period.

All of our employees are paid at or above the minimum wage.

Entity	Total	Full-time (or equivalent)	Part-time	Casual	Fixed term contract	Other features
Harvest Road Group Pty Ltd	56	51	4	0	1	
Harvey Industries Group Pty Ltd	1,247	806	11	429	1	759 migrant workers
Harvest Road Oceans Pty Ltd	54	42	1	9	2	1 migrant worker
Harvest Road Pastoral Pty Ltd	175	116	9	42	8	16 migrant workers
Koojan Downs Pty Ltd	7	47	0	8	16	17 migrant workers
Total	1,603	1,062	25	488	28	



Our Supply Chains

During the reporting period, Harvest Road Group procured from 2,198 direct suppliers in the first tier of our supply chain, being those suppliers that we have a direct contractual relationship with ("Tier One Suppliers").

All new suppliers with Harvest Road Group are assessed for modern slavery risk prior to onboarding and are required to agree to our Supplier Code of Conduct. A full description of our risk management and assessment procedures are set out on page 17 of this Statement.

99.09%

of our Tier One Suppliers are operating in Australia.

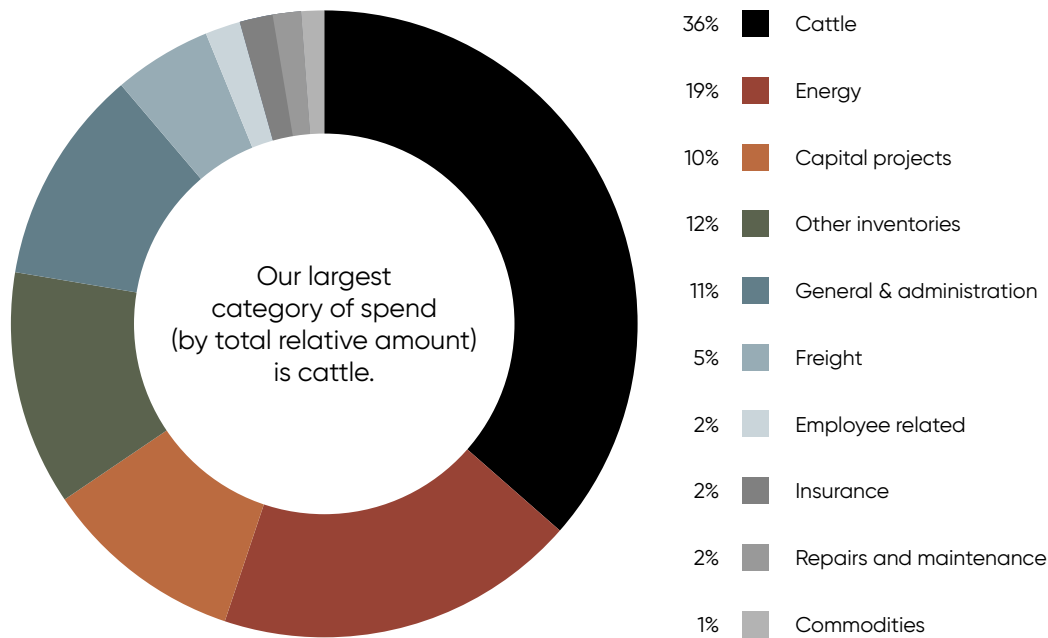


Figure 1: Harvest Road Group's largest categories of spend (by total relative amount).

We also have a small number of overseas Tier One Suppliers.

We understand the complexities global supply chains including our Tier One Suppliers, and the fact that many products purchased from local companies are either manufactured overseas or incorporate significant components from abroad.

Country	Percentage of Spend %
Australia	99.09%
Argentina	0.40%
New Zealand	0.32%
Chile	0.10%
Other Countries	0.09%

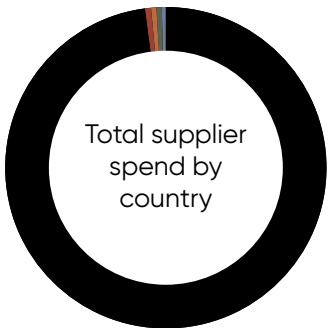


Figure 2: Total supplier spend by country.

Our Modern Slavery Risks

Operational Risks

Migrant workers in the beef processing facility in Harvey

Some of the factors contributing to potentially increased vulnerability include:

- Practices such as deceptive recruitment by labour hire agencies, which can result in compounding debt bondage;
- Hesitation to speak out for fear of having visa or immigration status revoked;
- Pressure to continue to financially support family members located in low socioeconomic geographies; and
- Lower-level English skills and minimal awareness about rights and protections under Australian law.

Given the specific modern slavery risks associated with employing migrant workers, Harvest Road Group has carried out specific due diligence to ensure that no workers were recruited through any approach or practice that was in anyway unfair, coercive or exploitative. A full description of due diligence activities undertaken is set out on page 19.

Seasonal workforce labour hire

To meet the operational needs of our seasonal horticulture business, we engaged 16 seasonal workers through a labour hire arrangement during the reporting period. The labour hire provider is engaged under a formal legal contract and we continue to develop our governance for the engagement of seasonal workers in our horticulture business.

Supply Chain Risks

To identify modern slavery risks in our supply chains, Harvest Road Group conducts modern slavery risk assessments of our suppliers to identify risks based on the industry and country of those suppliers.

Supply chain mapping was performed using an Integrated¹Assessment Engine developed by FairSupply. Their global Multi-Regional Input-Output (MRIO) table links supply chain data from 38,000 industry and country sector combinations. The MRIO is then examined against international standards. This process generates a modern slavery risk profile reflecting 10 tiers of our suppliers. This helps us to achieve practical visibility, from the raw materials used in the production of goods through to the services ultimately provided by our suppliers.

Australian beef cattle supply chain has been identified at the highest potential overall modern slavery risk exposure to our business (considering potential inherent industry category risks and our relative spend amounts). This assessment has confirmed that the elevated areas of potential risk are concentrated at, or proximate to, our Tier One Suppliers.

Electronics (laptops and mobile phones)

Harvest Road Group regularly purchases laptops and mobile phones for employee work use.

Solar panels

Harvest Road Group continues to scope the procurement of solar panels to maximise the use of renewable energy in our day-to-day operations. While we are excited about the benefits of an energy transition that will significantly reduce the overall carbon footprint of our operations, we are conscious of the potential risk associated with global solar energy supply chains.

Uniforms

Many of our employees wear uniforms. We recognise that the manufacture of such apparel and associated supply chains are areas of potentially significant modern slavery risk.

¹ This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table. This MRIO table is assembled using the following sources:

- The United Nations' (UN) System of National Accounts;
- UN COMTRADE databases;
- Eurostat databases;
- The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
- Numerous National Agencies including the Australian Bureau of Statistics.

The MRIO is then examined against the following international standards:

- The UN Guiding Principles on Business and Human Rights;
- The Global Slavery Index;
- International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
- The United States' Reports on International Child Labour and Forced Labour.

A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for Harvest Road Group's suppliers.



Assessing and Addressing Modern Slavery Risks

Harvest Road Group's Modern Slavery Risk Management Framework ("**Modern Slavery Framework**") guides our approach to limiting the risk of modern slavery practices in our supply chain. It comprises four key areas of focus:

Governance

A framework of policies and contractual arrangements that embed our values in the way we operate.

Risk Management

Undertaking due diligence to assess how goods and services in our supply chain are managed and produced, ensuring ethical recruitment and treatment of migrant workers.

Continuous Supplier Engagement, Corrective Action and Remedy

Engaging with suppliers to better understand and support their efforts to combat slavery.

Training and Collaboration

Raising awareness of modern slavery issues, both internally and through active collaboration with suppliers and external stakeholders.

Our approach to each area is set out over the subsequent pages.



Our Governance Framework

Harvest Road Group's Board of Directors provide oversight of the management of our modern slavery risks. To support the management of our modern slavery risk and response, Harvest Road Group has a suite of internal policies and procedures which are listed and described below.

Policy or Procedure	Purpose
Code of Conduct	<p>The Code of Conduct includes our commitment to respect the human rights of all people, including employees, partners and the people in communities in which we operate. Our Code of Conduct prohibits all forms of modern slavery.</p> <p>The Code of Conduct is translated into Korean, Chinese, Tagalog and Bislama – languages spoken by workers at our beef processing facility in Harvey.</p>
Modern Slavery Policy	<p>The Modern Slavery Policy outlines our commitment to ending all forms of modern slavery in our operations and the operations of our suppliers.</p> <p>The core principles are informed by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the ILO Core Conventions on Labour Standards and the United Nations Global Compact:</p> <ul style="list-style-type: none">• Every worker should have freedom of movement;• No worker should pay for a job;• No worker should be indebted or coerced to work, nor subject to threats or abuse;• Workers should be paid fairly for the work they do;• No child labour;• Respect rights of workers to freedom of association; and• Workers should have access to an operational-level grievance mechanism. <p>The principals of the Modern Slavery Policy extend not only to our employees, but also how we engage with, collaborate with our external suppliers and contracting workforce.</p>
Procurement Policy	<p>Our ethical procurement practices are outlined in the Procurement Policy, including the process for identifying, assessing and addressing modern slavery risk throughout the procurement process.</p>
Purchase Order Terms	<p>Our Purchase Order Terms include terms and conditions that specifically address modern slavery risks.</p> <p>The key terms of the Purchase Order Terms which address modern slavery risks include:</p>

Policy or Procedure	Purpose
	<ul style="list-style-type: none">Each supplier warrants that steps have been taken by them to identify and address modern slavery in their own operations and supply chain. This specifically includes an appropriate grievance mechanism consistent with the criteria set out in the United Nations' Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy Framework."Each supplier warrants that if they suspect or become aware of modern slavery risk in their operations and supply chains, they must take all reasonable action to address or prevent these practices, including remediation and disclosure of the instance to us.Each supplier is prohibited from requiring any personnel from paying recruitment (or related) fees to secure employment and is prohibited from possessing the original of any workers personal identification documents.
Recruitment and Selection Procedure	Harvest Road Group's staff recruitment and selection procedures support management and staff to appoint the most capable people to roles across the business. To address modern slavery risk factors, we ensure that international guidelines and local legislation in relation to minimum working age is adhered to.
Supplier Code of Conduct	Our Supplier Code of Conduct which outlines our expectations of suppliers and their conduct regarding the core principles listed in our Modern Slavery Policy. This includes workplace health and safety, environmental protection and ethical practices. We expect suppliers to investigate their labour practices and supply chains, and promptly address any cases of modern slavery or related exploitation and report these to us. This also includes the expectation that suppliers pay their workers fairly for the work they do and either pay or take steps towards paying workers a living wage.
The Whistleblower	Our Whistleblower Policy provides a practical tool for our stakeholders to disclose risk or wrongdoing in the workplace. It ensures that those who make disclosures will be protected and supported throughout the process.
Workplace Behaviour Policy	Our Workplace Behaviour Policy outlines the expected behaviour and requirement of all staff to treat others with dignity, courtesy and respect. The policy names unacceptable workplace conduct in line with legislation including the Australian Human Rights Commission Act 1986 (Cth).
Workplace Investigation Procedure	Applicable to both internal and external stakeholders, this procedure covers non-conformances, including any material breach of our modern slavery provisions, human rights violations or incidents of modern slavery.

Modern Slavery Working Group

Harvest Road Group has a Modern Slavery Working Group which includes staff from our Operations, ESG, People & Culture, Legal and Finance Teams and is sponsored by the Chief Financial Officer. The Modern Slavery Working Group supports and facilitates our modern slavery actions across each of the operating businesses within Harvest Road Group and ensures that all initiatives to address modern slavery are effectively implemented.

Risk Management and Assessment

Pre-contract supplier screening for modern slavery risk

As part of our ongoing due diligence, we worked to embed a pre-contract supplier screening process across all Harvest Road Group business units. New prospective suppliers are now screened to assess their inherent modern slavery risk based on the product/service and their geography.

Suppliers must also adhere to our Supplier Code of Conduct . If there is an elevated inherent risk, the prospective suppliers are required to complete a Self-Assessment Questionnaire (SAQ) which requests information in the following key areas:

- Risk identification and assessment;
- Education and training;
- Policies and procedures;
- Grievance mechanism;
- Due diligence;
- Measuring effectiveness; and
- Remediation.

Existing supplier's inherent risk assessment

Using FairSupply's Integrated Assessment Engine (refer to page 13) we screen all our suppliers for inherent modern slavery risk. All suppliers with elevated inherent risk are requested to complete a SAQ to provide more information about the risks in their operations, supply chains and how they are mitigating them. If required, we will conduct further due diligence by engaging directly with the supplier



Supplier Engagement, Corrective Action and Remedy

To provide transparency and insights into our supplier engagement efforts, a breakdown of supplier engagement, actions, and remedies are provided in the table below. All new suppliers on-boarded during the reporting period are required to complete a new supplier form which contains modern slavery questions on supplier industry type, supplier code of conduct, types of goods and services being supplied and primary origin. If a potential supplier is identified as having a higher inherent risk, an SAQ is issued to them for completion to help us understand what actions they are taking to manage the risk. During the reporting period, we achieved SAQ return rate of 62.5%.

Due diligence activity	Results FY24
Number of SAQ's issued	16
Number of SAQ's returned	10 (62.5%)
Number of SAQ's requiring follow up clarifications via email	1
Number of management interviews	1
Number of suppliers sent educational resources	0

Of the 37.5% of suppliers who did not respond or return an SAQ, they have been placed on temporary block for orders and payments.

If the risk management activities provided in the SAQ response are inadequate, then the supplier is assigned a high residual risk. The supplier then requires further investigation and we will engage directly with the supplier to conduct due diligence.

Additional due diligence activities include follow-up through email communication, management interviews, desktop audits, and on-site audits where necessary.

Harvest Road Group did not identify any instances of modern slavery during the reporting period. We have outlined our remediation of modern slavery risks on page 22.



Due Diligence and Actions Undertaken

Given the potential elevated risk of modern slavery in industries which Harvest Road Group operates, we recognise the importance of effectively addressing those risks and continually improving our overall modern slavery response.

Seasonal workforce labour hire

To meet the operational needs of our seasonal horticulture business, we contract seasonal workers through a labour hire company. Whilst the labour hire company was not flagged in our modern slavery risk assessments, we acknowledge the higher risk for modern slavery within the labour hire sector generally. In response, we undertook due diligence on the labour hire company, including conducting an onsite audit, and review of supplier engagement.

During the review we identified there was no formal agreement between Harvest Road Group and the labour hire company. We also had no record of their agreement to our Supplier Code of Conduct. This attributed to our long-term working relationship with the labour hire company, predating our current supplier onboarding process. Subsequently, the parties negotiated a formal agreement which is now in place. We also requested the labour hire company complete a Self-Assessment Questionnaire which was completed and responses did not warrant further investigation.

In March 2024, we conducted worker interviews with the four horticulture workers engaged through the labour hire company. The objective was to learn about the workers recruitment experience and to ensure all workers are being treated fairly and all labour standards are compliant. The interviews were conducted in a private setting without managerial supervision.

All labour hire workers were recruited through the Pacific Australia Labour Mobility (PALM) Scheme by the labour hire company and are paid in accordance with the casual Horticulture Award. The workers expressed satisfaction with their work and workplace conditions, and raised no concerns regarding recruitment processes, treatment, workplace environment, or accommodation. Supporting documentation such as pay slips and contracts were sourced from the labour hire company to validate workers' statements. Importantly, all employees indicated understanding of grievance procedures, although it was noted that whistleblower information was not displayed in the workplace.

Consequently, whistleblower posters were provided in both English and Bislama (the language commonly spoken by the workers) to be displayed in the horticulture farm sheds, along with educational materials on "what is modern slavery?".

As part of our ongoing commitment to transparency, continuous improvement, and awareness of modern slavery, these due diligence activities were documented in a comprehensive report. This report was disseminated to relevant contacts across the business, including members of the Group Leadership Team.

Uniforms

The 2023 Global Slavery Index published by Walk Free identified garments among the top five imported products at risk of modern slavery. Harvest Road Group recognises the importance of ensuring ethical sourcing practices within its supply chain, particularly concerning uniforms and personal protective equipment (PPE) procurement. We understand that labour exploitation is pervasive at each stage of the supply chain including producing the raw material, processing and manufacturing.

Harvest Road Group procures uniforms for employees across our businesses. This includes corporate apparel, workwear for station staff and specialised aquaculture workwear for farm staff. The majority of our spend relates to PPE required for the workers at the beef processing facility in Harvey. Due to the elevated risk in this industry we undertook a comprehensive due diligence review of 10 uniform suppliers. An overview of the findings is shown in the table below.



Supplier	Country of origin	Risk rating	Fy2024 expenditure	SAQ completed	Business has modern slavery considerations in place*	Tier 2 suppliers with modern slavery considerations
1	Australia	Moderate Low	Low	Requested	Awaiting SAQ	3 of 3, 100%
2	Australia	Moderate Low	Low	Requested	Awaiting SAQ	NA (No suppliers)
3	Australia	Moderate Low	Low	Yes	Yes	NA (No suppliers)
4	Australia	Moderate Low	Low	Yes	In Progress	Only work with aligned suppliers 100%
5	Australia	Moderate Low	Medium	Yes	Yes	2 of 3, 66.6%
6	Australia	Moderate Low	Medium	Requested	Awaiting SAQ	0 of 1, 0%
7	Australia	Moderate Low	Medium	Yes	No	1 of 2, 50%
8	Australia	Moderate Low	Medium	Yes	Yes	Only work with aligned suppliers 100%
9	Australia	Moderate	High	Yes	In Progress	7 of 8, 87.5%
10	Australia	Moderate	High	Yes	Yes	3 of 3, 100%

Due diligence process:

- Risk rating: Aside from for two new suppliers, all others underwent previous quarterly modern slavery risk assessment which identifies risk based on industry and country. For further information about our screening process please refer to Page 17. None of our uniform suppliers were considered high risk. Whilst all direct suppliers reside in Australia, their suppliers (our tier 2) are from a range of other countries including Bangladesh, Canada, China, India Italy, and New Zealand
- Expenditure: The ten suppliers were categorised based on our expenditure; Low (\$0–\$9,999) comprising of 40%, Medium (\$10k–\$49,999) representing another 40% and High (\$50,000 +) accounting for the remaining 20%. It was observed that as the expenditure increased, so did the corresponding risk rating, highlighting a correlation between investment and risk.
- Self-Assessment Questionnaire (SAQ) completion: Half of the suppliers had previously completed a SAQ to an acceptable level.

We sent a request to the outstanding suppliers and have continued to follow them up and placed their account on temporary block to ensure no other transactions go through until we have received and reviewed their SAQ.

- Modern slavery risk mitigation considerations: We conducted a desktop review searching for evidence of modern slavery risk mitigation measures. Information was sourced from the SAQ (if completed) and public governance and policy frameworks, modern slavery statements and other ESG reports. Six suppliers have risk mitigation processes developed or in progress. Three of the suppliers had no information available and we are awaiting their completed SAQ for more information. The remaining supplier, a small family embroidery business that also procures workwear advised they have no risk mitigation processes in place and instead rely on their suppliers (our tier two suppliers). We requested more information from companies, and were satisfied with their final responses. However we are still working to get information about polyester thread sourced from Japan and Taiwan.

- Tier two supplier review: among our suppliers, 8 engaged with secondary suppliers (our tier two) to procure goods. Recognising the importance of cascading our due diligence efforts we expanded our review to include these secondary suppliers whose products are integral to our business. A substantial number of our tier two suppliers had modern slavery considerations integrated into their operations. We did however encounter one company where we could not find any information which promoted us to reach out directly. Whilst we are still awaiting response, we know the business operates in New Zealand, a region with lower risk factors.
- Corporate structure: where accessible, we examined the corporate structure and domicile countries of the parent entities. Most of our suppliers consist of local, family-owned businesses, with one exception being owned by a larger corporate entity.
- Negative media: No negative modern slavery media stories pertaining to any of the suppliers could be found.

The final due diligence report prepared by our internal ESG team was disseminated to procurement teams across Harvest Road Group, empowering them to leverage their existing relationships with suppliers for effective follow up and continuous improvement. This activity has generated valuable insights and strengthened understanding of the risks in our uniform supply chain. However, we acknowledge that this is an ongoing effort, and we must remain vigilant in our commitment to a supply chain free from exploitation.

Training and Collaboration

Staff training

We provide our staff with training to increase modern slavery awareness and improve efficiencies in modern slavery screening processes. In the reporting period, we;

- Consulted with procurement and finance teams to improve and update supplier forms and procedures for efficient supplier screening process.
- Created an internal 'ESG Hub' intranet page, serving as central source for all staff to access, save all modern slavery documentation including supplier forms, procedures, and educational resources.

- Delivered in-person training to staff about the improved modern slavery screening process.
- Sent internal e-comms throughout the year to raise modern slavery awareness.
- Provided all new staff with a copy of the Modern Slavery Policy.
- Continued to provide online modern slavery training modules to all new staff at onboarding. The online training ensures all employees are familiar with specific provisions in relation to our Modern Slavery Policy and Code of Conduct.
- Rolled out refresher modern slavery training to existing staff.

Tattarang modern slavery working group collaboration

Whilst Harvest Road Group manages its own modern slavery activities, we are also active representatives in the Tattarang Modern Slavery Working Group. The group meets quarterly to consider Tattarang's overall approach to modern slavery, including "end goals" of each business and streamlining processes to achieve specific objectives. As an active member we remain fully engaged on how we can continuously improve our approach to identifying, assessing and addressing modern slavery risks.



Remediation of Modern Slavery

During the reporting period we did not identify any instances of modern slavery. Nevertheless, we recognize the pervasive nature of modern slavery in global supply chains and are fully dedicated to enhancing our risk identification and assessment processes.

If we discover that our actions have caused, contributed to, or are directly linked to actual or suspected instances of modern slavery, we are resolute in our commitment to provide remedy or facilitate access to remedy for all those adversely impacted. We will do this through the implementation of corrective action plans. Harvest Road Group has documented its approach to remediation of all incidents of actual or suspected nonconformance (including modern slavery concerns) ("Workplace Investigation Procedure"). This Workplace Investigation Procedure covers non-conformances, including any material breach of our modern slavery provisions, human rights violations or incidents of modern slavery. In the case of a non-conformance, the incident would be reported to the relevant Group Leadership Team member.

No non-conformances in relation to modern slavery concerns were identified during the reporting period. Our remediation process is supported by policies which clearly define the procedures undertaken internally to remedy harm.

Our Workplace Behaviour Policy outlines the expected behaviour and requirement of all staff to treat others with dignity, courtesy and respect ("Workplace Behaviour Policy"). The Workplace Behaviour Policy names unacceptable workplace conduct in line with legislation including the Australian Human Rights Commission Act 1986 (Cth).

Our Employee Grievance and Dispute Resolution Procedure has been translated into the main languages spoken at our beef processing facility in Harvey (Korean, Chinese, Tagalog and Bislama). All translated documents are stored on the Employee Self Service system (ESS), where employees can access any time. The multilingual whistleblower hotline remains prominently featured on numerous electronic display screens within the beef processing facility. These screens showcase the hotline information in a total of four commonly used languages by our workforce.





Measuring Effectiveness and Our Future Commitments

Our Effectiveness

An important measure for transparency in our overall modern slavery response is ensuring continuity between reporting periods. This involves providing detailed information on the areas where we have successfully implemented key performance indicators (KPI's) and those where we are still working towards achieving them. During the reporting period, we determined our effectiveness in each action based on whether we had completed the action or not, noted in the ('progress report').

However, we acknowledge the potential to improve our assessment framework by implementing targeted KPI's in the next reporting period. In our previous statement, we highlighted specific focus areas for this reporting period. The table below presents these focus areas, along with a progress report:

Area of focus	Improvement initiative	Fy24 Update	Progress report
Governance	Develop targeted KPI's for each planned action for the next reporting period to enhance our assessment framework.	<ul style="list-style-type: none">See below	In Progress
Risk Assessment	Continue to assess modern slavery risk by screening prospective suppliers prior to onboarding and existing suppliers on a quarterly basis.	<ul style="list-style-type: none">All suppliers onboarded are assessed for modern slavery risk.All existing suppliers are assessed through Fair Supply quarterly.	Completed
Risk Assessment	Conduct deeper due diligence on suppliers in high-risk supply chains.	<ul style="list-style-type: none">SAQs were sent to higher risk suppliers quarterly.Internal reviews performed on uniform suppliers and seasonal workforce labour hirer.Performed quarterly through SAQs on further assessment for suppliers classified as high.	Completed
Supplier Engagement, Corrective Action and Remedy	Continue to engage with our suppliers and partners.	<ul style="list-style-type: none">SAQs issued to suppliers in high risk categories and further due diligence performed on seasonal workers and uniform suppliers.	Complete and Ongoing
Supplier Engagement, Corrective Action and Remedy	Monitoring request for tender and proposal submissions and assessing alignment with modern slavery provisions.	<ul style="list-style-type: none">All tenders and proposals have been assessed against our modern slavery provisions.	Complete and Ongoing
Training and Collaboration	Maintain modern slavery training at onboarding.	<ul style="list-style-type: none">Training delivered online for new and existing staff	Complete and Ongoing

Future Commitments

For the next reporting period we aim to build on the foundations laid in the FY2024 period, focusing on streamlining modern slavery processes across all Harvest Road Group businesses.

Area of impact	Planned action for next reporting period (2024/25)
Governance	Develop targeted KPI's for each planned action for the next reporting period to enhance our assessment framework.
Risk Assessment	Continue to assess modern slavery risk by screening prospective suppliers prior to onboarding and existing suppliers on a quarterly basis.
Risk Assessment	Consider consolidation of suppliers and allow further reviews on existing suppliers to be screened further.
Risk Assessment	Conduct deeper due diligence on existing suppliers in high-risk supply chains.
Supplier Engagement, Corrective Action and Remedy	Continue to engage with our suppliers and partners.
Supplier Engagement, Corrective Action and Remedy	Continue to monitor request for tender and proposal submissions and assessing alignment with modern slavery provisions.
Training and Collaboration	Continue modern slavery training for onboarding of new staff and maintain training to existing staff through refreshers from training system.

Consultation With Owned and Controlled Entities

Consultation with all Harvest Road Group owned, and controlled entities has occurred in the preparation of this Statement, as well as in relation to our overall modern slavery response across the reporting period. Harvest Road Group's Head of ESG has engaged with representatives across Harvest Road Group's business operations to review and support actions against modern slavery.

All entities within Harvest Road Group undertake the same risk assessment and due diligence processes described throughout this Statement.

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Harvest Road Group Pty Ltd