

BE Campbell Pty Ltd - Modern Slavery Statement 2020

This statement covers the activities of BE Campbell Pty Ltd ABN 97 164 598 120 ("BEC") to understand and implement actions to minimise the risk of modern slavery in our operations and supply chain.

Introduction

This is BE Campbell's first Modern Slavery Statement, as informed by the Federal Modern Slavery Act 2018. The purpose of this statement is to outline the steps we have taken to identify, manage and mitigate risks of Modern Slavery in our operations and supply chain.

BE Campbell recognises that slavery and human trafficking can occur in many forms including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, and child labour.

Ensuring the rights of our employees and workers within our supply chain are respected is a critical aspect of our overall Corporate Responsibility and aligns directly with our culture as depicted in the BEC Way and our purpose of 'Enriching lives through wholesome food'. As such, BE Campbell is fully committed to operating responsibly and adhering to the highest ethical standards. We will not tolerate any forms of slavery or human trafficking in our business.

Our Business

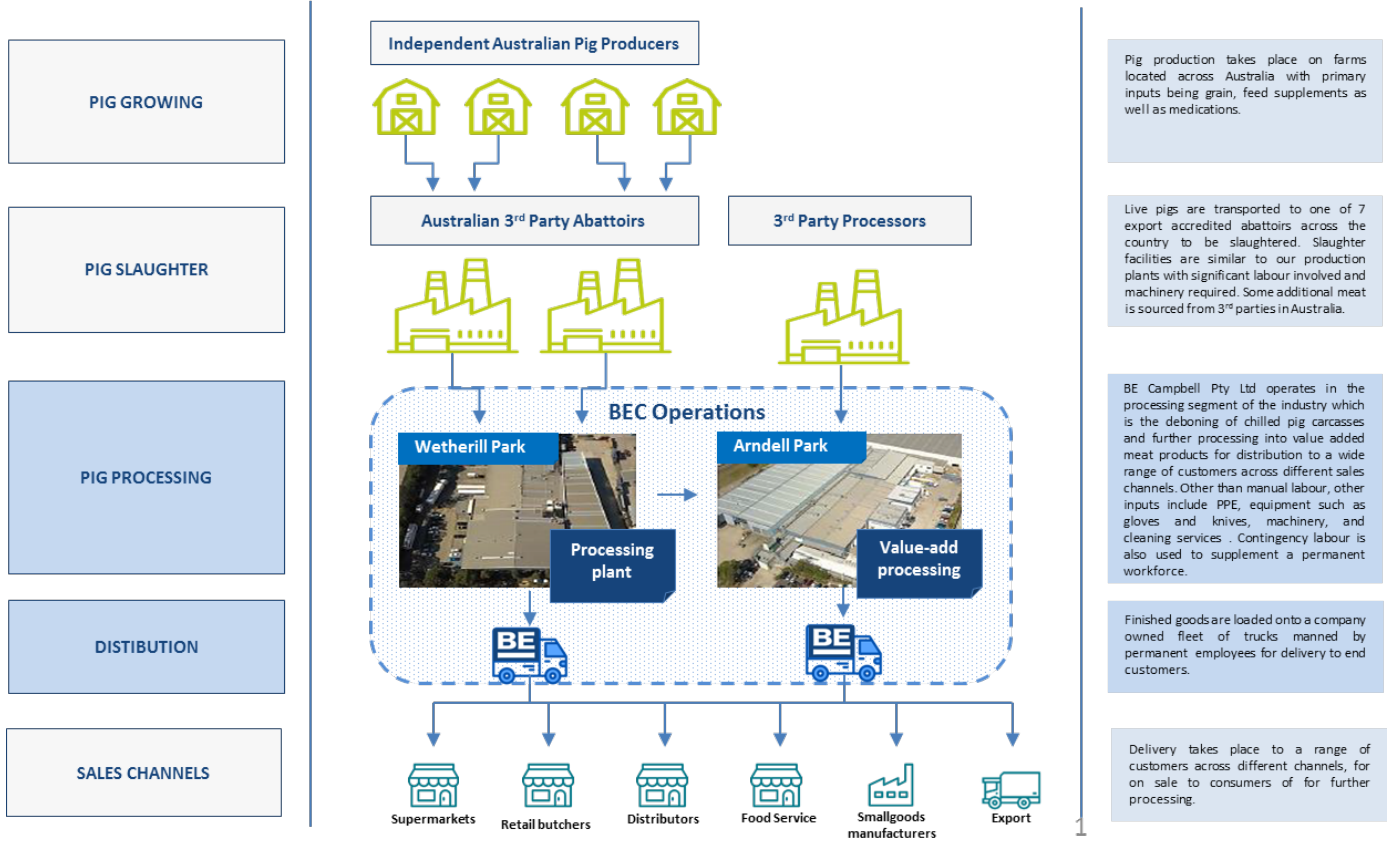
BE Campbell Pty Ltd (ABN 97 164 598 120) is an Australian family owned and operated company, established in 1969 by Bruce Edward Campbell. Based in New South Wales (NSW), BEC processes and distributes fresh Australian meat and meat products, specialising in pork cuts. The company employs approximately 730 staff and sells its products to multiple channels including supermarkets, retail butchers and other food service providers.

Our Structure and Supply Chain

BE Campbell's operations are located in Sydney Australia and consist of two production plants, a fleet of transport vehicles, a Head Office site and the workers it directly employs.

The company's supply chains include Australian farms that produce livestock, Australian abattoirs that provide slaughter services, and transport providers that deliver both raw materials to BE Campbell and later finished goods to end customers. Other goods that are procured include ingredients, packaging, personal equipment and clothing, and machinery required in the production process. Additionally, BE Campbell's supply chain extends to services that contribute to its operations such as cleaning, contractors, security and labour hire services.

BEC Supply Chain



Our Approach

In line with our broader risk appetite and risk management framework, BE Campbell has a zero tolerance approach towards practices that directly or indirectly contribute towards any forms of modern slavery. The below governance structure has been put in place in an effort to develop a robust set of practices and processes in order to continually improve the company's compliance with Modern Slavery obligations as well as our own high ethical standards.





Risk Assessment

BE Campbell have undertaken a review of potential risk of modern slavery practices across our operations and supply chains using a Risk Management Framework supplemented with publically available risk indicators.

During the assessment process, we considered risks that may possibly cause, contribute and/or be directly linked to modern slavery practices whilst also considering other risk factors such as the industry, types of products and services, and geographic locations.

In summary, the company does not believe there to be major risks within its current supply chain. Due to the domestic nature of the Australian Pork industry, the majority of goods and services related to the business are located in Australia and as such do not face the inherent risks of other countries. With that said, there remain some aspects in which the company believes deserve more attention and oversight. These include:

1. Contingent Labour Hire industry brings a level of inherent risk associated with incidences of underpayment of wages, non compliance with visa conditions, non compliance with regulatory compliance to training and safety. To reduce the level of risk in this area BE Campbell has implemented the following measures:
 - Service Level Agreements in place for each Agency
 - Induction provided to all labour hire staff and with translations where required
 - Monitoring Labour Hire hourly rates are consistent with the relevant Award rates
 - Monthly audit of payroll for randomly selected contingent labour hire staff
 - Randomly selected monthly audit of visa currency through VEVO for labour hire staff

2. Imported goods from countries of risk. BE Campbell is unaware of any connection to or with organisations that are linked to practices of modern slavery. However in acknowledgement that the company is embarking on a process of continual improvement as systems and process become more robust, it considers some imported goods as posing some risk. BE Campbell imports a range of products that are utilised in the production process such as PPE, consumables and knives from countries with varying risk levels. In addition to this there are some (non-pork) food products that BE Campbell imports and classifies internally as 'trading goods' to include as part of a basket of goods to certain foodservice customers.

Addressing the risk

To address the risks of modern slavery in our operations and supply chain, BEC has implemented processes and policies in an effort to build an effective and robust framework, whilst recognizing that this is the beginning of a process of iterative improvement.

Starting from the top, the board and executive leadership team have engaged in in-house modern slavery awareness training sessions and are promulgating the importance of a company culture that values and enforces human rights and our responsibility in protecting these as a corporate citizen.

BEC have a Responsible Sourcing Policy, recently updated to reflect a more comprehensive coverage of modern slavery considerations that guides procurement practices from supplier selection to onboarding. The company also has in place a 'Speak Up' Policy to allow for an anonymous grievance and alert mechanism which will be shared across our supply chain.

Supplier engagement in the form of modern slavery questionnaires has begun and will continue to be rolled out in order of determined risk with weight given to annual spend.

Future commitments

BE Campbell is committed to doing its part in ensuring there is no place for Modern Slavery practices to exist in today's world. Its commitment has formed part of a broader overarching Corporate Social Responsibility strategy that will drive the business to do better, with specific targets and milestones initially set for 2025. A robust program of supplier engagement will occur in order to get closer to our supply chain partners and know exactly what risks they are exposed to and what they are doing about it. The Modern Slavery Working Group will continue to meet quarterly in order to monitor the progress to our commitments and provide the board with updates.

This Statement has been approved by the Board of BE Campbell Pty Ltd.



Ted Campbell

Managing Director