



MODERN SLAVERY STATEMENT

This joint statement is published in accordance with the Modern Slavery Act 2018 (Cth). It sets out the actions taken by Sapphire Cattle Company Pty Ltd, Hewitt Agribusiness Pty Ltd (then Hewitt Cattle Australia Pty Ltd) and Arcadian Organic & Natural Meat Co Pty Ltd, to address modern slavery risks in our supply chain during the calendar year ending 31 December 2022.

Introduction

Hewitt is a leader in the Australian agricultural and organic meat industries. As a global food producer, we own and operate a vertically integrated supply chain and ecosystem spanning livestock production through to branded retail-ready organic and natural meat products, providing approximately 400 tonnes of protein per week across the globe.

We understand that modern slavery is a complex issue and acknowledge that the nature of our business means that we are exposed to potential modern slavery risks across our operations and supply chain. We are committed to understanding the modern slavery risks in our business and taking action to limit this problem by working with our people, subsidiaries, stakeholders, business partners and suppliers. This modern slavery statement details the steps we have taken to identify and address the risk of modern slavery in our operations and supply chain.

“People are the first pillar of our critical success factors and we take our commitment to protecting those who work in our supply chain seriously.”
Mick Hewitt, Group CEO

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**). The reporting period for this Modern Slavery Statement is January – December 2022 (**Reporting Period**). This is Hewitt's first Modern Slavery Statement and is made jointly by Sapphire Cattle Company Pty Ltd ACN 600 389 286 (**Sapphire**), Hewitt Agribusiness Pty Ltd ACN 157 927 887, formerly Hewitt Cattle Australia Pty Ltd (**Hewitt Agriculture**) and Arcadian Organic & Natural Meat Co Pty Limited ACN 158 956 864 (**Arcadian**). Sapphire and Arcadian are reporting entities as defined under the Act. Together Sapphire, Hewitt Agriculture and Arcadian are collectively referred to as '**Hewitt**', '**we**', '**us**' and '**our**'.

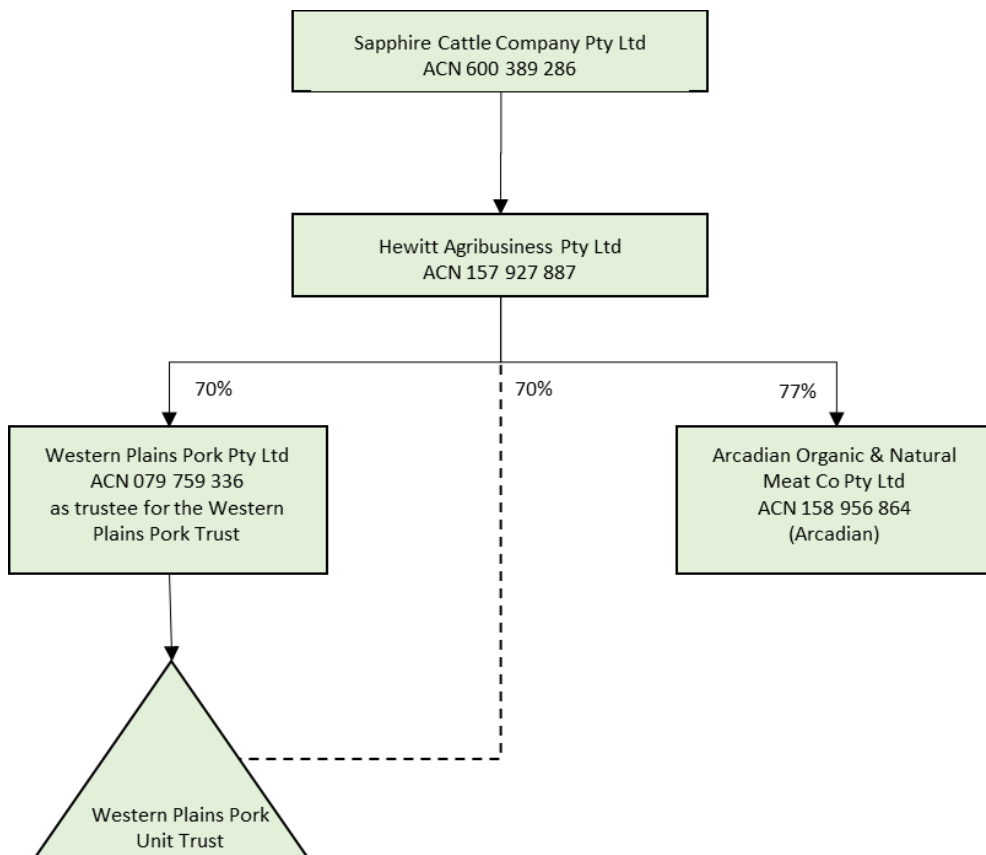
We are proud to share our commitment to addressing modern slavery, but we recognise there is more that can be achieved. As a global supplier of high-claims protein, we welcome the opportunity to promote ethical practices and reduce modern slavery risks in our operations and supply chain, in partnership with our suppliers, members, business partners and other stakeholders.

Structure, Operations and Supply Chain

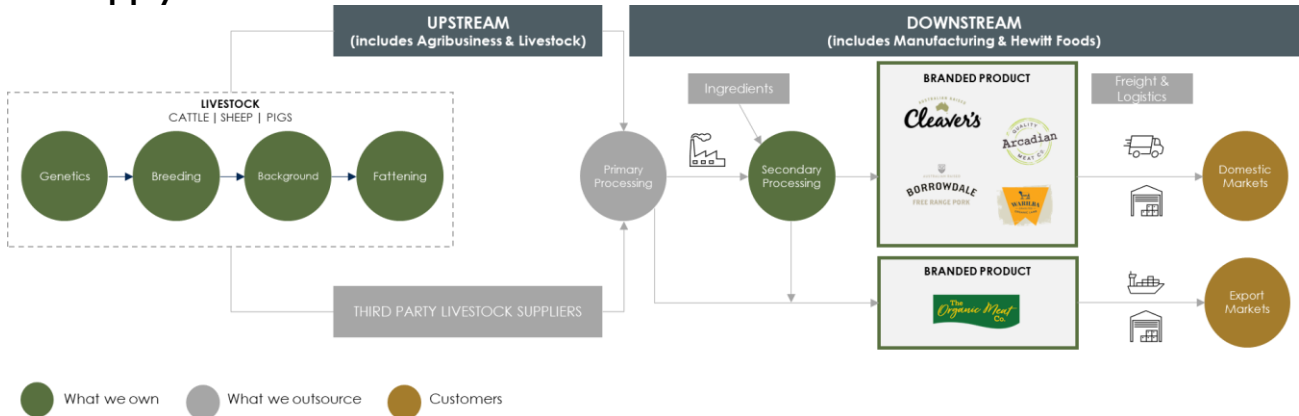
In Australia, Hewitt is a significant producer of livestock, high quality certified organic and free-range meat products. We sell our branded products throughout Australia. We also produce a range of bulk organic and natural meat products which are sold as a wholesale product to other producers in Australia, the USA and Asia.

We employ 278 staff across the organisation, with pastoral properties in Queensland, New South Wales, the Northern Territory and Victoria as well as a meat processing facility in New South Wales.

In 2022, our Company structure was made up of several operating entities.



Our Supply Chain



Our supply chain comprises a diverse range of business partners and stakeholders, with our finished products including:

- branded retail-ready meat products sold through domestic retail channels and to export markets;
- branded and un-branded organic meat products sold to parties who will further process that product to produce their own branded product; and
- livestock sold either within our own supply chain or to third party processors.

Our principle raw materials are predominantly Australian made or produced, other than some secondary ingredients. Hewitt supplies approximately 25% of its organic red meat and 100% of pork requirements from our internal operations and procures the balance from Australian producers.

In addition to raw materials, we procure a range of supplies and services, including grain and feed, primary meat processing services, packaging, transportation, logistics and distribution, cold storage, maintenance services and various associated professional and administrative services (e.g. legal, IT, human resources, etc.).

Modern Slavery Risks in our Operations and Supply Chains

At Hewitt, we acknowledge that modern slavery risks can arise in our operations and supply chain. To identify and address these risks, Hewitt has conducted a modern slavery risk assessment of our operations and supply chain.

Risks in our Operations

We assessed the risk of modern slavery in our own operations to be low. Our operations and employees are based in Australia, which is a low-risk country for modern slavery according to The Global Slavery Index 2018.

We have extensive policies and procedures in place in our business providing employees with safe systems of work and we have implemented systems and processes to ensure that our employees are paid correctly and that their hours worked are not excessive. We also have a number of avenues to allow workers, their families and other stakeholders to raise concerns about our practices on an anonymous basis without penalty and we communicate these avenues to staff on a regular basis.

We acknowledge that one of the risks in our own operation is the seasonal nature of certain pastoral activities and our need for casual or temporary workers to address these seasonal challenges. We have an Enterprise Agreement in place for our pastoral operations which sets minimum conditions and standards for workers on our properties and continue to review our policies and procedures to ensure that they are fair and our workers are safe.

Risks in our Supply Chain

Within our supply chain, our own operations are two of the three largest suppliers to our downstream business (by spend). As a result, we have increased oversight, visibility and control over a significant part of our direct supply chain. We are pursuing regenerative organic certifications for many of our farming operations, which are issued and administered by the Regenerative Organic Alliance (**ROA**). The criterion for certification will require Hewitt to maintain high standards in relation to worker fairness, as well as animal welfare and land management and will mandate an annual independent third party audit process to validate these processes.

In this inaugural report, we have focused predominantly on our own practices and understanding our supply chain and the inherent risks arising as a result of the industry and locations in which our suppliers operate.

Our other major suppliers (by spend) are livestock producers, primary processing plants and trucking and logistics companies. Many of these entities have published their own modern slavery statements and we have reviewed these, together with any publicly available modern slavery policies to understand their approach to and assessment of modern slavery risks in their supply chain. We will work with these suppliers in the coming years to deepen our understanding of their supply chain and the risks within it, including seeking modern slavery statements.

Hewitt identified approximately 1,750 suppliers in this Reporting Period. The majority of these suppliers are located in Australia. A substantial number of Hewitt's suppliers operate in the agricultural and meat processing industries or in associated industries and therefore we acknowledge an element of risk of modern slavery within our supply chain that requires further investigation. Further, we understand that our suppliers may procure materials from other suppliers in a number of countries which may increase the modern slavery risks in our supply chain.

Assessing and Addressing our Modern Slavery Risks

Hewitt is committed to taking steps to assess and address the risks of modern slavery occurring in our operations and supply chains. We understand that this involves ongoing management efforts to identify, prevent and mitigate such risks through due diligence and remediation processes.

Policies, Processes and Procedures

Hewitt has a number of policies, processes and procedures in place which provide a framework for managing modern slavery risks in our supply chain, including:

1. Code of Conduct – Hewitt has a Code of Conduct in place to provide a framework of principles Hewitt abides by in business and its dealings with stakeholders. Our Code of Conduct requires employees, contractors and directors to act in an ethical manner and exemplify Hewitt's high standards of professionalism.
2. Health & Safety Systems – At Hewitt, we prioritise the health and safety of our personnel. We have a number of policies and procedures prioritising employee and contractor safety, and mental and physical wellbeing.
3. Recruitment policies – Hewitt has a recruitment policy in place to ensure fairness and equality is incorporated into each step of its recruitment process.
4. Grievance & Whistleblower Platforms – Hewitt has formal grievance policies, in addition to a whistleblower policy, each of which provides stakeholders with multiple ways to raise concerns with Hewitt either directly or through anonymous channels and these are received and managed through our Governance or People, Safety & Culture teams and with independent external support as required.
5. Remuneration processes – we have processes in place to ensure employees are paid and that the hours worked by employees are monitored.
6. Governance structures – we have appointed independent directors and will be establishing formal board subcommittees to oversee risk management in our supply chain, including modern slavery risks.

Assessing the Effectiveness of our Actions

Hewitt recognises the importance of continuous improvement by regularly assessing the effectiveness of our actions taken to address modern slavery risks. In doing this, we aim to build more transparent and open relationships with our suppliers in order to mitigate the risk of modern slavery occurring in our operations and supply chain.

We will review and assess our performance in addressing modern slavery risks each year by producing a modern slavery statement as required by the Act.

The Way Forward

While we have confidence in our own operations in Australia, we acknowledge that it is important to remain alive to the risks of modern slavery and we will continue to engage with stakeholders to measure our own policies and practices combatting modern slavery within our supply chain.

We are committed to continuously improving our processes to address the modern slavery risks in our operations and supply chains and ways to mitigate them. Over the next reporting period, we intend to:

- within our own farming operations, pursue regenerative organic certifications with independent certification that our stations meet the farmer and worker fairness pillars;
- work with key primary producers in Arcadian's organic supply chain to encourage suppliers to pursue regenerative organic certification to help build our confidence in their practices and enable a third party audit process in relation to farmer and worker fairness;
- where key suppliers are unable or unsuited to pursue regenerative organic certifications, we will seek confirmation of their practices in relation to modern slavery through surveys and questionnaires to enable a risk assessment of their operations;
- continue to undertake a comprehensive review of our policies and procedures to ensure they are compliant with the Act;
- automate aspects of our contracting process to increase the number of contracts we enter into with modern slavery clauses; and
- where possible, embed modern slavery clauses and compliance statements into new and existing supplier contracts.

Statement Approval

This statement was approved by the Board of Hewitt Agribusiness at a meeting held on 1 December 2023. The board of Sapphire and Hewitt Agribusiness are the same, and the management team of Hewitt Agribusiness oversees all three businesses. Accordingly, consultation with Sapphire, Hewitt and Arcadian has occurred as part of the process.

Signed

DocuSigned by:


3EA07565278842A...

Mick Hewitt

Group CEO & Managing Director, Hewitt
Director, Sapphire Cattle Company Pty Ltd

Dec-04-2023

Date