



# MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2024 - 2025



## **MODERN SLAVERY STATEMENT**

**D'Orsogna Limited (ACN 063 427 752)**

**Financial Year 2024-2025**

This Modern Slavery Statement, in accordance to the Modern Slavery Act 2018 (Cth), is prepared for the period 1 July 2024 to 30 June 2025 by D'Orsogna Limited ("D'Orsogna").

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

### **MESSAGE FROM THE MANAGING DIRECTOR**

D'Orsogna Ltd is committed to operating responsibly and establishing and adhering to high ethical and social standards. In this Statement, we outline the actions we have taken to identify and address modern slavery risks in our operations and supply chain. It also outlines the steps we have taken to review and strengthen our modern slavery response. This statement serves as a foundation for continuous improvement in how we communicate our ongoing work to manage modern slavery risks.

At D'Orsogna Ltd, we remain committed to respecting human rights throughout our operations, and within our supply chain. We take a zero-tolerance approach to any form of modern slavery including servitude, human trafficking and forced labour. We foster an ethical and transparent approach to business, working to implement effective systems and controls, striving for the best outcomes safely and with passion and purpose, embracing a culture of no harm.

During the period, D'Orsogna Limited has continued to improve our compliance framework and risk management processes which includes partnering with suppliers and business partners who share our values of meeting human rights obligations and who oppose to all forms of slavery and forced labour in its operations and the operations of its suppliers.

We recognise that fostering a culture of integrity, respect and accountability is essential to an effective modern slavery response. We recognise that we need to continue to make improvements to ensure that we continue to work towards eliminating modern slavery risks within our business and to meet Australian Modern Slavery Act obligations.

**Jason Craig**  
**Managing Director**

21 November 2025



## About our operations

Founded in 1949, D’Orsogna Ltd is an Australian owned and operated food manufacturing company in Western Australia and Victoria employing over 780 employees. D’Orsogna’s core business is producing a range of processed ham, bacon and smallgoods for the retail and food service sectors.

During the reporting period D’Orsogna continued to engage with business of goods and services that have a similar value system and business ethic, which includes respect of human rights and sustainable business practices. D’Orsogna recognises that as a large purchaser of goods and services, the values and ethical practices of its suppliers can have a significant impact on our performance and reputation within the communities in which we operate.



### Our Mission Statement

*“With a proud history and heritage, D’Orsogna is committed to excellence in all we do, from the food we produce to our relationships with employees, customers, partners, consumers and shareholders. We achieve this through the highest levels of Safety, Quality, Innovation, Respect and Integrity.”*

**INTEGRITY**  
*We are committed to acting with integrity in all our business dealings.*

**SAFETY**  
*We are dedicated to continuously improving our safety performance.*

**QUALITY**  
*We are committed to providing products and services that meet or exceed our customers’ expectations.*

**INNOVATION**  
*To be creative and open to new ways to produce food for people to enjoy.*

**RESPECT**  
*We foster a culture of trust, where everyone feels safe to express their ideas and opinions.*

## Structure

D’Orsogna Ltd is a public company as defined in the Corporations Act 2001. The Directors of the Board are all non-executive other than then Managing Director. Four of the Directors are members of the D’Orsogna family, and three Directors are independent. The Chair is an independent Director.

The company also has a Audit and Risk Management Committee that oversees Risk Management, Compliance and Audits.

The Managing Director is the link between the Board and the Executive Management team that is responsible for the day-to-day operations and management of the company, including achievement of the company’s strategic goals.



## Modern Slavery Act 2018 Compliance

During the reporting period we continued to assess our own operations and our supply chain exposure to the risk of modern slavery. The methodology and outcomes of the actions and assessments is described in this statement.

### Actions taken in relation to modern slavery risks within our operations and supply chain.

An established audit and risk management committee is in place that meets regularly to review compliance within our operations. The committee includes members of the governing body.

D’Orsogna recognises that risks do exist within our supply chain and will vary depending on the industry and geographic location of our suppliers. A number of policies and procedures are in place including Ethical Conduct and Sourcing which is supported by a Supplier Code of Conduct. Our internal quality assurance program measures supplier performance and new modern slavery reporting tool monitors activities, however we recognise that continued improvement is required in the monitoring of compliance in relation to supplier selection and compliance within all our business operations.

### Key policies and procedures to manage modern slavery risks

The below policies, procedures, assessments and compliance activities were conducted during the reporting period.

Policies, Procedures & Processes	Undertaken
Ethical Conduct & Sourcing Policy	● ● ●
Internal Code of Conduct Policy	● ● ●
Preferred & Approved Vendor SOP Register	● ● ●
Risk Management Policy	● ● ●
Whistle Blower Policy	● ● ●
Employee Code of Conduct	● ● ●
Employment Policy <i>which includes labour hire management</i>	● ● ●
Grievance Policy	● ● ●
Vendor Contracts renewal includes reference to ethical practices	● ● ●
Business Partner Requirements include reference to modern slavery compliance	● ● ●
Supplier Code of Conduct	● ● ●
Modern Slavery App IPRO– Online reporting rolled out tool to improve risk assessments and data collation	● ● ●
Procurement Policy	● ● ●
Review of training programs to in relation to modern slavery	● ● ●
	● ● ● ●

● Updated ● Reviewed ● Re-communicated ● In progress



## Risks of modern slavery practices in D'Orsogna's operations and supply chain

### Internal Operations – Risk Assessments

In the 2025 reporting period, D'Orsogna continued to review and assesses the risks of modern slavery within our own internal operations. During the reporting period we conducted an internal audit on our own employment practices and grievance reports to identify any modern slavery issues within our own operations. We are also required to collaborate and meet our obligations to our own customers who require modern slavery reporting requirements and assessments to be met.

### Supply Chain – Risk Assessments

D'Orsogna continued its risk program on assessing our supply chain within our operations to identify any modern slavery issues.

#### Actions Taken

- Reviewed current procedures and protocols to identify gaps in the current compliance program.
- Conducted a review of Vendors on the current preferred vendor list and reviewed contract terms.
- Launched new data collection reporting tool in the 2025 reporting period.
- As part of our due diligence process, The IPRO Modern Slavery Assessment tool was utilised to collect data from our suppliers.
- As an additional due diligence step, the tool allows us to ask suppliers to upload documentation to support their assessment responses.
- During the reporting period 131 suppliers completed the assessment.

After each supplier completed and submitted the questionnaire, their responses were assessed to determine their location and their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

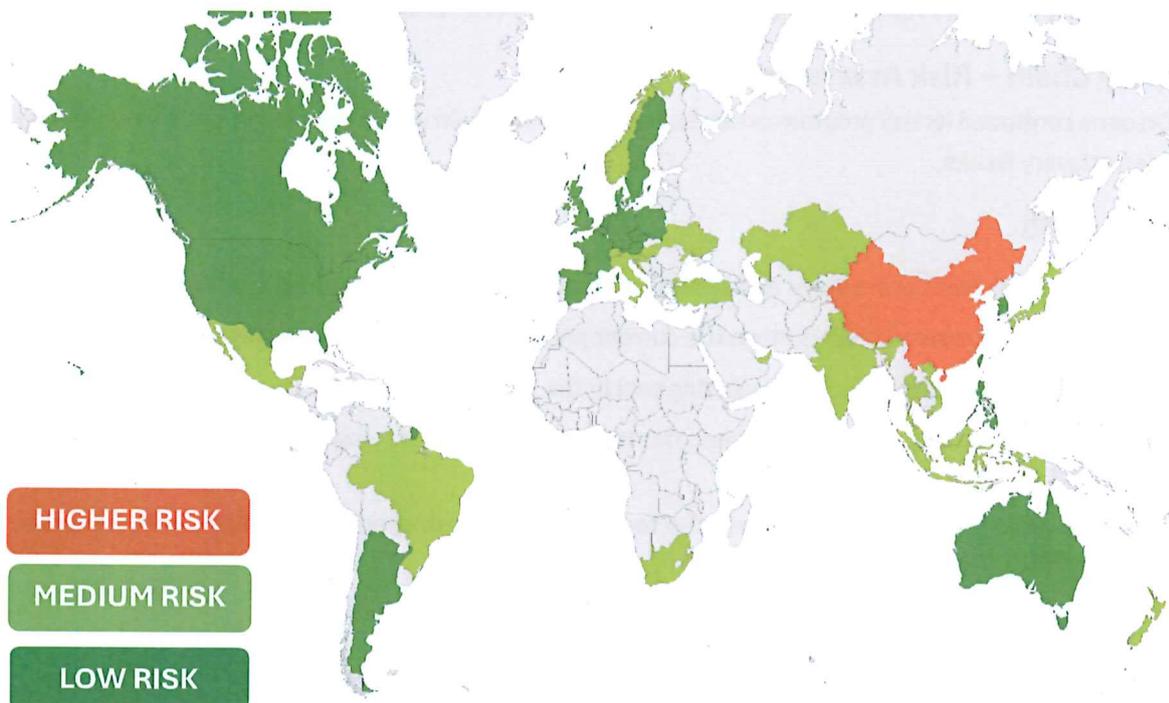
- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

## Supply Chain Assessment– Location of suppliers to identify risk

High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

From the data collection that occurred during the reporting period, the below graphic shows the high-risk sectors (highlighted in orange) of operation, production, and sourcing for our suppliers.



On review of data for the reporting period, most of D’Orsogna’s direct supply chain spend continues to be with meat suppliers who are predominantly located in Western Europe, Australia and America. This is followed by transport, packaging and dry goods materials suppliers including some of which are sourced from China. China has a **higher risk** of modern slavery when reviewing The Global Slavery Index during the reporting period. The majority of suppliers country of origin were assessed as **medium** to **low risk**.

Due to some major suppliers being located overseas in a high-risk location, that we are not easily able to site visit, we recognise that risks do exist within our supply chain. Due to demographic challenges, we need further action controls and transparency of our supply partners to improve modern slavery risks within our operations.



## Supply Chain Assessment– Assessing goods or services procured

The below graphics show the sectors of operation, production, and sourcing for our suppliers. The numbers in the below graphics describe how many suppliers are in the corresponding sectors. Labour hire is predominantly for office-based employees and has been assessed as low risk. The **high-risk** suppliers are predominantly in the manufacturing, mining or agricultural industries.

 Accommodation and Food Service Activities <b>7</b>	 Agriculture, Forestries, and Fishing <b>13</b>
 Building services contractor <b>4</b>	 Cleaning <b>10</b>
 Construction <b>6</b>	 Labour hire <b>8</b>
 Maintenance and Repair of motor vehicles <b>7</b>	 Manufacturing <b>27</b>
 Mining and Quarrying <b>2</b>	 Personal services <b>1</b>
 Retail <b>6</b>	 Security services <b>3</b>
 Transportation and Storage <b>21</b>	 Wholesale <b>16</b>

## Effectiveness of actions taken

### Internal operations – Modern Slavery: Risk Rating **LOW**

The modern slavery risk was assessed as low as we have not identified any modern slavery issues indicating effective actions and controls due to the following factors:

- Governance Committee in place (ARMC) Audit Risk Management Committee
- Dedicated Human Resources Department. Senior HR Executive provides monthly reporting to the board and quarterly updates to the ARMC.
  - Inductions and on-boarding of new employees which includes providing mandatory information required under the Fair Work Act.
  - Internal compliance auditing in relation to ensuring our employees all have work rights, old enough to work and working at D'Orsogna Ltd at their own free will.
  - Employees have access to unions that attend sites, consultation and grievance raising mechanisms.
  - Access to anonymous internal grievance reporting tools easily available via apps and surveys.
  - SMETA audits conducted by third party
  - Consultation with our employees and employee relations



- Board Endorsed policies, including:
  - Whistle Blower Policy
  - Ethical conduct and Sourcing Policy
  - Internal Code of Conduct Policy

## External operations – Modern Slavery Risk Rating **MEDIUM**

The effectiveness of the actions taken were measured and overall risk rating was **medium** based on data that was collected. 131 online questionnaires were completed in the reporting period.

Supplier Assessment Completion Rate	72.6%
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There are still further improvements that can be implemented to enhance the data collation process to further engage the suppliers on the assessment process to achieve 100% completion to reduce our exposure to modern slavery risks.

Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment and improve the effectiveness of the program.

We have started rolling out a supplier follow-up initiative to further discuss the action items and address the risks identified through the assessment. Primarily this involves ensuring that suppliers have the right policies and procedures in place to mitigate inherent risks in their business.

The gaps in our operational modern slavery risk management have already started to be closed through the implementation of the actions indicating that the system is effective.

As this is the first year, we have used the platform to conduct our assessments and due diligence, we will be able to further measure the effect of actions implemented when the assessments are completed during the next reporting period.

During this reporting period, our focus was to continue to improve our due diligence by improving policies, awareness and understanding of our modern slavery risks and how these risks may present in our own internal operations and supply chains.

D'Orsogna Limited is a member of SEDEX and participates in auditing activities (SMETA) by a third party in relation to compliance in relation to the Ethical Sourcing Initiative Code. The audit includes reviewing our processes and procedures in relation to modern slavery within our own internal operations but also on how we apply the requirements to our suppliers and the effectiveness. We have scored well in these audits indicating effective controls.

On assessment of the effectiveness of the actions undertaken during the current reporting period we have identified that we have some good effective controls from actions implemented to improve the program, however, we continue to have some gaps in the supply chain in relation to modern slavery. To address this, we will need to further review our processes and controls in order to achieve continuous improvement.



Not all modern slavery risks have been eliminated as identified in our supply chain assessment. A key challenge in addressing the risks identified remains the ability to source alternate suitable suppliers to be able to produce what is needed to run our operations when they do not comply with modern slavery reporting requirements. During the 2025 reporting period we have successfully been able to source alternate suppliers for some of our materials and services enabling options so that non-compliant suppliers are put on notice where they have not completed the required assessments and risks cannot be mitigated.

We recognise that our review and assessment process have some limitations in identifying and addressing all of our modern slavery risks within our operations and across our supply chain. Some of our major suppliers are located overseas. It is a challenge to gain true transparency unless the facilities are physically visited.

## **Remediation and monitoring**

Where a legitimate modern slavery concern or issue is raised, through one of our grievance mechanisms, we are committed to work with our suppliers, Government and worker representative bodies to ensure an appropriate remedy is provided. The responsibility for managing the complaint in a way that protects the individual/s involved is assigned under the relevant policies that have been developed as an action to address modern slavery.

Where a non-conformance is found in our assessments or a grievance is lodged, we will engage with the supplier to assist to remediate the issue/s identified. Where the non-conformance is not rectified within the required timeframes this is escalated to the relevant stakeholders. This is a critical component of our remediation approach.

By actively monitoring compliance we help support improved working conditions.

### **Grievance mechanisms**

We respect the rights of individuals therefore to support this we provide a number of grievance mechanisms.

#### **A. Whistle Blower Policy**

Our Whistle Blower Policy endorsed by the Board, encourages the reporting of any suspected unethical, illegal, fraudulent or undesirable conduct, including suspected adverse impacts on people, communities or the environment within our supply chain. The Whistle Blower Policy includes a website link and external hotline number managed by an external contractor, Your Call, who monitor and provide quarterly reports.

#### **B. Internal Grievance Procedures**

The company has an internal Human Resources Department and a documented grievance procedure. We communicate this grievance procedure through inductions, re-fresher inductions and visible printed copies on noticeboards and via the company intranet. The procedure includes the process of accessing union support, all access confidential reporting app, government bodies such as Fair Work Australia if the remedy is found to be unsatisfactory for employment related issues or Worksafe Australia in the case of safety related grievances.



### **C. SMETA Audits**

The audit process includes interviewing employees without the presence of management in relation to labour standards and health and safety within our operations.

### **D. Supplier Engagement**

One of the compliance documents requested under the new IPRO system is a copy of the supplier grievance procedure in order to encourage suppliers to strengthen their own processes.

## **Consultation**

D'Orsogna Limited management in consultation with the ARMC and governing body are responsible for the risk and compliance functions.

D'Orsogna management actively engages and consults with all relevant stakeholders including our governing body, suppliers and customers to implement and assess the modern slavery risk identification and remediation measures within our entity.

As part of the consultation process, D'Orsogna has taken the following actions:

- Consulted with all entities we own and control.
- Adoption and implementation of an Ethical conduct and sourcing policy against slavery and trafficking of persons throughout the company and its operations. Senior leadership team are consulted on expectations and policy requirements.
- Consulted with our customers in relation to their requirements.
- Representatives from senior leadership, governing body, have been consulted and/or involved in preparing and approving this statement.
- Provided our suppliers with information on modern slavery and consulted as to why these requirements are required throughout our supply chain.

## **Future actions to be taken to address modern slavery risks.**

In order to reduce the risks and achieve improved compliance with the Act, the company will be taking the following actions during the 2026 reporting period.

- Continue to further develop and improve on D'Orsogna's Preferred Vendor Program which is monitored through the company's Quality Management System to manage risk within our supply chain relationships.
- Improve on SEDEX (Supplier Ethical Data and Exchange Platform) engagement and utilisation.
- Review and amend key policies to improve on our risk management processes.
- Improve our reporting and data collation via the new IPRO Modern Slavery risk assessment tool.
- Target 100 % compliance with supplier assessment completion.
- Improve our due diligence process to include better methods of assessing overseas suppliers in particular those in high-risk industries or locations.



- Risk Management reporting to the governing body. Provide the ARMC current information on high risk or non-compliant suppliers.
- Review and improve our current initial and refresher training programs effectiveness to raise more awareness of the ETI code, (Ethical Trade Initiative) and modern slavery risks within our operations and supply chains.
- Review and improve grievance mechanism process on dealing with an identified Modern Slavery Issue within our supply chain.
- Team members who deal with our suppliers will be required to complete training programs that will cover modern slavery and ethical sourcing via professional body if not yet completed.
- Continuous review of Supplier Contracts to ensure that suppliers meet the supplier code of conduct.
- Internal worker education on key employment rights and minimum conditions.
- Continue with internal auditing processes.
- Continue to improve on training programs delivered on employment related policies and procedures for our internal management team.
- Continue to participate in SMETA audits and promptly resolve issues requiring corrective actions.

### **Any other information that the reporting entity considers relevant**

We are monitoring any updates that are provided from the consultation process on strengthening the Modern Slavery Act to ensure that we stay up to date and aware of any changes to future reporting and entity obligations.

### **Statement approval**

In accordance with the requirements of the Modern Slavery Act, this statement was approved by the Board of D'Orsogna Limited in their capacity as governing body for the financial year ending the 30 June 2025. The Managing Director of the reporting entity has signed the statement.

*This Modern Slavery Statement is prepared in accordance with the criteria set out in the Modern Slavery Act 2018 (Cth).*

