

Modern Slavery Statement

2023 - 2024



This statement covers the activities of Golden Cockerel Pty Ltd

ABN 84 009 906 432



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Golden Cockerel is an independent Poultry Processor currently employing approximately 700 people. Our head office and processing facility are located in Mount Cotton, Queensland Australia.

Golden Cockerel is jointly owned by two families who have been involved in the Australian poultry industry for three generations. We presently process in excess of 35 million broilers per annum.

Golden Cockerel supplies fresh and frozen poultry and value-added products to a range of domestic and international customers. Our customers include major retailers, restaurants and the food service industry.

Golden Cockerel strives to ensure integrity, ethics and transparency in all activities. We are fully committed to ongoing review of our risk profile and maintaining strict compliance with relevant laws and regulations.

Golden Cockerel sources goods and services from Australia and internationally.

- **Broilers** for processing is from Australian farms integrated with Golden Cockerel.
- **Packaging, consumables and ingredients** (used for value added components) are sourced from Tier 1 suppliers within Australia.
- **Plant and equipment** is sourced from a variety of locations including Europe and Asia. Most vendors are located within or maintain Australian based operations.
- **Services to support operations** are engaged from Australian suppliers and may include cleaning, specialist engineering, site security and a canteen operator.
- **Labour** hire services are engaged to supplement internal recruitment efforts when required.

**90% procurement from
Tier 1 Australian suppliers**



Summary Of Procurement Activities	Risk of Non-compliance
Broilers (livestock)	Low
Packaging, consumables and ingredients sourced from Tier 1 suppliers	Low
Plant and equipment	Low
Labour hire	Med

OUR POLICIES

Our Code of Conduct outlines our company values and how we will conduct ourselves. It covers a range of important elements about how we do business, including behaving ethically and lawfully. It sets out the standards of behaviour we expect of our people, including our directors, employees and contractors.

We have the following policies in place to ensure our commitment to good corporate governance and responsible business practices. These proactively assist with identification of potential risks for slavery and human exploitation.

- Modern Slavery Policy (*newly implemented 2024*)
- Business Ethics & Integrity Policy
- Whistleblower Policy
- Recruitment Policy
- Employee Code of Conduct

DUE DILLIGENCE & RISKS

Golden Cockerel considers overall risk of modern slavery practices to be low. This conclusion is based on the following supply chain review findings.

- Sourcing majority of goods and services from Australia where possible.
- Workers are directly employed. Labour hire utilisation is <5% of total labour requirement.
- Sedex compliance audit on yearly basis where results are shared with customers and partners.
- Fair and transparent recruitment process with working right checks.
- Internal auditing process for contractors, labour hire and procurement. Involves SAQs, document review requests, working right checks. Implemented to ensure ongoing compliance.
- 94% of all workers are employed under collectively negotiated agreement/s ratified by the Fair Work Commission. Remaining 6% of non-production or technical employees are on above-award wages or common law contracts.
- Regular JCC (Joint Consultative Committee) meetings with employees and other external representatives. Transparent and collaborative approach to reporting and assessing potential risks.
- No issues identified from Tier 1 suppliers who completed SAQs in 2024.

Golden Cockerel operations are subject to rigorous external auditing through our customers respective Ethical/Social Accountability programs. Golden Cockerel has been a **member of Sedex (Supplier Ethical Data Exchange) since 2018**.

Overall we conclude modern slavery as low risk in our business. However, we do need to acknowledge potential emerging risks from Tier 2 and Tier 3 suppliers as we broaden our approach to mapping the supply chain. Potential concerns around the origin of source material (from outside OECD countries) used in the overseas manufacture of some plant equipment.

Any labour not directly hired by Golen Cockerel is assessed as medium level risk. As a result, extra diligence is applied to working right checks and provision of general training/instruction for these workers.

RISK DETECTION AND MANAGEMENT

Despite our low risk profile, we are committed to continually improving how we work with the supply chain to meet our ethical obligation to combat potential slavery and exploitation risks. Our actions are focussed to ensure potential risks are identified and avoided.

We are pro-actively working to deepen our review of the supply chain in support of our commitment to this statement and our overall strategy.

Potential risks will be actioned appropriately using our internal risk management process



Concerns regarding potential modern slavery issues can be raised internally through the established grievance process or externally through the process outlined in the published Whistleblower Policy.

TRAINING

Training is an essential component of our risk management, governance and compliance framework. Training ensures all employees are aware of their obligations under our compliance policies, and are able to access further information when required.

Training completed in 2023 / 2024 in relation to policy, awareness, ethical management and business practices includes:

- Introduction of the **Modern Slavery Policy**.
- Refresher training for Code of Conduct, Business Ethics and Integrity Policy, Bullying and Harassment Awareness.

KEY AREAS OF FOCUS 2024 / 2025

- Complete Tier 2 and Tier 3 supply chain review.
- Review and update of Code of Conduct.
- Further review and updating risk related policy and governance control measures.
- Continue participation in internal and external auditing around social accountability and modern slavery practises.

This statement is made pursuant to section 13 of the Modern Slavery Act 2018 and constitutes the slavery and human trafficking statement of Golden Cockerel Pty Ltd for the year ended 30 June 2024 and has been approved by the Golden Cockerel Board.

Signature by: Dennis Stark
Chief Executive Officer

June 2024