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MESSAGE FROM OUR CEO

At Bindaree Food Group (**BFG**), we have always believed in the importance of ethical business practices and are committed to upholding human rights across our operations and supply chain.

This modern slavery statement details potential modern slavery risks and what we have done to assess and address those risks, both within our own operations and across our supply chain, during FY24.

We are proud of the progress we have made in engaging with our suppliers on this important issue, but also recognise there is always room to improve. We remain dedicated to implementing effective systems and controls to help combat modern slavery.



A handwritten signature in black ink, which appears to read 'Andrew McDonald'. The signature is fluid and cursive.

Andrew McDonald
Chief Executive Officer

OUR STRUCTURE

BFG is one of Australia’s largest privately-owned beef processors, operating a paddock to plate supply chain and connecting producers to customers through the production of high quality meat products.

BFG comprises the following reporting entities, as defined in the *Modern Slavery Act 2018* (Cth):

- Yolarno Pty Ltd (ACN 002 255 183) is the parent company of BFG and is responsible for its corporate functions;
- Bindaree Beef Pty Ltd (ACN 056 599 163) operates our Inverell Processing Facility, Myola Feedlot and Brisbane Warehouse;
- Monbeef Pty Ltd (ACN 079 546 964) operates our Cooma Processing Facility;
- Bindaree Food Group Pty Ltd (ACN 627 335 684) operates our Burleigh Heads Retail Ready Facility (Bindaree Food Solutions); and
- Sanger Australia Pty Ltd (ACN 001 085 687) carries out the export, sales and marketing activities of BFG.

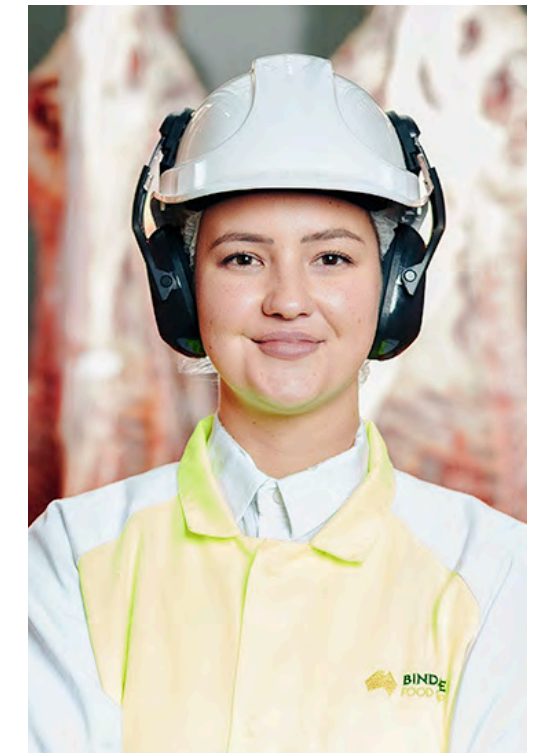
In addition, BFG operates several small overseas entities, including in Shanghai and London.



OUR SUPPLY CHAIN

BFG works with hundreds of suppliers, ranging from small family businesses to global multinational companies. For the purpose of this report, we identified and engaged with suppliers to whom BFG paid over AUD 30,000 in FY24. As to be expected, livestock purchases represented our greatest spend. Major categories of non-livestock spend include meat, grain and feed commodities; plant and equipment; packaging; electricity; logistics (including warehousing and transport); maintenance and cleaning services; and labour hire services.

We recognise that modern supply chains are extremely complex. The suppliers identified above are tier one suppliers with whom BFG has a direct contractual relationship. Tier two suppliers provide goods or services to tier one suppliers, and tier three suppliers provide goods or services to tier two suppliers. We work closely with our tier one suppliers to communicate our expectations in relation to ethical supply chains, and to understand what sort of modern slavery risks may arise not just in their operations, but in the operations of our tier two and tier three suppliers.



OUR OPERATIONS

MYOLA FEEDLOT

Situated in the heart of the NSW 'Golden Triangle', our Myola feedlot has access to premium locally grown grains to provide our cattle with the highest quality feed. Its proximity to Inverell also makes it an integral part of our supply chain. The feedlot has a licence to carry 20,000 head of cattle, and we have 29 employees in the Myola team.



BINDAREE FOOD SOLUTIONS

Our retail ready plant is located at Burleigh Heads and employs 184 people. Bindaree Food Solutions' facility provides the capability to produce branded retail ready meat products for supermarkets and other key customers.



BINDAREE BEEF PROCESSING

Our primary processing facility is located in the picturesque New England region of northern NSW and employs 913 team members. It boasts a specialised slaughter floor, boning room, cryovac facility, render plant and load-out area. Our skilled team is committed to delivering the highest quality beef products to customers worldwide. Neighbouring the processing facility is our Alsace property, which supports irrigation and wastewater solutions for our operations.



MONBEEF PROCESSING

Our processing facility at Cooma uses the latest hot-boning technology to process quality beef, and employs 118 team members.



FREIGHT ST WAREHOUSE

Our warehouse in Brisbane QLD is a cold storage centre with a primary function of receiving and despatching chilled and frozen beef products, and employs 29 team members.



SANGER AUSTRALIA

Sanger Australia is the export and logistics division of BFG, located in Sydney NSW. Our team provides unparalleled customer service and a seamless end to end export process, from product sourcing and documentation through to logistics and shipping.

OVERSEAS OFFICES

BFG operates small overseas sales offices to help drive our understanding of consumer behaviours and needs, and coordinate sales, in different markets.



MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

OUR OPERATIONS

We acknowledge that no business is immune to modern slavery risks. We consider the risk of modern slavery amongst our direct team members to be very low given we have visibility over their employment terms and conditions, with 78.1% of our employees on negotiated enterprise bargaining agreements or modern awards, and the remaining 21.9% on standard employment contracts.

However, there is an inherently higher risk of modern slavery where we use indirect labour at our sites, particularly migrant labour hire workers. These workers can be particularly vulnerable to exploitation due to geographic isolation, language barriers, limited choice of living and working conditions, and limited availability of resources including healthcare. We provide further details of these risks on page 8 of this statement.

OUR SUPPLY CHAIN

Other examples of potential modern slavery risks in our supply chain are as follows.

- Third party suppliers of goods such as uniforms, packaging, information technology and solar panels may rely on temporary or migrant workers in their own operations or supply chains, including in countries that may not have or enforce human rights laws.
- Third party suppliers of third party shipping services rely on large numbers of seafarers, who may be particularly vulnerable due to limited visibility of conditions on board, complex supplier arrangements, and fragmented jurisdictional oversight.
- Third party suppliers of warehousing services, particularly in China where BFG has a small operation, may subject workers to poor working conditions, and workers who have migrated from rural to urban areas in order to procure work may face heightened risk.

We outline on page 6 of this statement how we are addressing such risks of modern slavery in our supply chain.



ASSESSING AND ADDRESSING **MODERN SLAVERY RISKS**

UNDERSTANDING **OUR SUPPLIERS**

BFG continues to make progress in engaging with our suppliers to address modern slavery risks, including requiring new suppliers to respond to our modern slavery questionnaire before onboarding, and existing suppliers to update their responses annually. Our focus for the annual update continues to be on tier one suppliers and this year we lowered our spend threshold to AUD 30,000, resulting in our questionnaire being sent to over 700 suppliers in Australia (an increase from 429 in the FY23 reporting period). This year we continued to issue surveys to suppliers through their key relationship contacts within BFG, which has yielded positive results with survey responses continuing to grow year on year.

LIVESTOCK **PRODUCERS**

Our livestock producers make up the largest part of our overall supply chain and include many family run businesses with no employees. Overall, we have assessed there is a low risk of modern slavery occurring within the operations of these smaller producers. Nevertheless, we have sought to continually improve our level of engagement with them including, for example, by sending explanatory letters regarding modern slavery obligations and encouraging producers to discuss issues directly with us.

OTHER **SUPPLIERS**

Where we identified higher risk areas in our supply chain, for example with cleaning, labour hire and Chinese suppliers, we undertook a concentrated effort to ensure that suppliers responded to our modern slavery questionnaire and provided supporting documentation to illustrate their governance systems in dealing with modern slavery risk. We assessed that many of the larger companies and professional service firms in our supply chains presented a low risk for modern slavery, due to their robust governance frameworks (many of which were supplied in response to our questionnaire) and the office-based nature of their work. During this reporting period, some of our suppliers provided details about their processes for remediating modern slavery incidents and risks within their supply chains. Encouragingly, suppliers with a remediation process focused on improving compliance within their supply chains rather than immediately terminating agreements with higher risk or non-complying suppliers.

CONTRACTUAL **OBLIGATIONS**

In addition to surveying our suppliers, we have reviewed both our standard and negotiated agreements to ensure they contain robust obligations for our suppliers in relation to modern slavery and workers' rights.



POLICIES AND TRAINING

BFG has the following policies and procedures in place to assist in addressing the risks of modern slavery within our operations and supply chain. These documents are reviewed on a regular basis to ensure they reflect legislative requirements and best practice.

Modern Slavery Policy	We are committed to ensuring that we have systems and controls in place to ensure modern slavery is not taking place in our operations or supply chain.
Whistleblower Policy	We are committed to protecting individuals who report instances of illegal or unethical behaviour including modern slavery occurring within our operations or supply chain.
Ethical Sourcing and Accountability Policy	We are committed to integrating ethical and socially responsible business practices into our operations. Our policy incorporates the relevant conventions of the International Labour Organisation and the principles of the UN's Universal Declaration of Human Rights, and we take a continuous improvement approach to stakeholder engagement with the principles of this policy.
Workplace Grievance Policy	We are committed to resolving workplace grievances efficiently and fairly through appropriate resolution processes to ensure that team members will not be disadvantaged as a result of lodging a grievance.
Anti Bribery and Corruption Policy	We do not tolerate bribery or corruption in any form, and this policy ensures that our team members and contractors do not engage in bribery or corruption both domestically and internationally. Such practices indicate an unacceptable level of risk in a supplier and often coincide with other unethical business practices like modern slavery.
Anti Discrimination Policy	We are committed to ensuring a safe and inclusive workplace free from all forms of bullying and harassment for all team members, as well as preventing the human rights harms that are associated with discrimination and harassment.
Training	BFG has a robust training program to ensure that all team members understand our policies and their rights and obligations under them, allowing individuals to better identify and report on modern slavery incidents. Training on BFG policies, including in relation to whistleblower and workplace grievance mechanisms, is mandatory for all team members as part of our onboarding process, whether done online for our corporate team members or in person for our production team members. In addition, we require team members to complete training updates on a regular basis through our online training platform.

LABOUR HIRE WORKERS

BFG partners with trusted third party labour hire providers to help with workforce solutions at our Inverell, Myola, Cooma and Burleigh Heads sites. Our labour hire workers are predominantly engaged under the Pacific Australia Labour Mobility (**PALM**) scheme, with 368 of our team members under this scheme as at the end of the FY24 reporting period.

The PALM scheme, an important program that addresses labour shortages in Australia and supports the economic growth of Pacific Island countries, is closely managed by the Australian Government through its Department of Foreign Affairs and Trade, and Department of Employment and Workplace Relations. PALM employer organisations must pass strict eligibility criteria to bring in and employ workers under the PALM scheme, and in turn BFG only partners with approved PALM employers following due diligence processes and contractual negotiations to ensure modern slavery risks are addressed.

Throughout 2023 and 2024, significant changes were introduced to the PALM scheme to further improve workers' rights including minimum hour commitments, minimum pay guarantees after deductions, pay parity, clear grievance mechanisms and cultural competencies requirements.

In addition to its statutory and contractual obligations, the major PALM labour hire organisation with which we have partnered has implemented the following initiatives:

- Community of care model which aims to foster a sense of connection between PALM workers and their communities including social and pastoral support through involvement in local religious, sporting and choir groups.
- Provision of education about Australian legal, taxation and other issues to assist PALM workers adapt to life in Australia.
- Commitment to working closely with BFG to monitor and report on living conditions, health issues and pay deductions.

Internally, one of BFG's targets in FY25 is to increase workplace consultation by ensuring that all operational sites have a Consultative or Engagement Committee in place. This will allow further opportunities for workers, including PALM workers, to raise issues directly with BFG.



We note that labour hire solutions outside of the PALM scheme are subject to less regulation and oversight. BFG has focused recently on increasing its recruitment efforts to directly employ more workers where possible. Our intention is to decrease the sourcing of temporary employees from unregulated labour hire pathways outside of the PALM scheme, therefore lowering the risk of modern slavery practices in our labour hire supply chain.



SPOTLIGHT

FIJIAN GOVERNMENT VISIT

In October 2024, the Hon. Agni Deo Singh, the Fijian Minister for Employment, Productivity and Workplace Relations, together with a delegation from the Fijian government and Australia’s Department of Employment and Workplace Relations, visited our Inverell plant.

The purpose of the visit was to discuss PALM scheme issues and opportunities, particularly worker welfare. Members of the delegation spoke directly to some of our PALM team members to understand their experiences working at BFG. The visit was reported as follows in the Fijian media: *“Upon hearing the positive feedback from the Fijian workers, Minister Agni Deo Singh expressed heartfelt gratitude to the management team at Bindaree Beef and the Food Industry People Group Recruitment Agency for their commitment and steadfast support to the Fijian workers.”*

(Praneeta Prakash, “Fijian workers in Australia praise employer support”, available at <https://www.fbcnews.com.fj/news/fijian-workers-in-australia-praise-employer-support/>)



For further insight into one of our PALM worker’s experiences at our Myola feedlot, please watch the above video, available at: <https://youtu.be/uMgASCJDLlw>



ASSESSING EFFECTIVENESS

In implementing our modern slavery strategy to date, we have focused on increasing response rates to our modern slavery questionnaire year on year, in order to better understand the approaches, policies and processes of our suppliers in combatting modern slavery. Each year we have made slight adjustments to our surveying practices to encourage better engagement with our modern slavery questionnaire.

Our attempts to increase response rates to our questionnaire have been very successful, with a 70% increase in responses from our Australian suppliers from the last reporting period (83 in FY23) to this reporting period (142 in FY24). This year our survey also included suppliers to our Monbeef processing plant in Cooma which we acquired just prior to the end of the FY23 reporting period. Responses from our Chinese suppliers remained consistent with the number of responses received last year (being approximately 20% of suppliers surveyed).

CONSULTATION WITH CONTROLLED ENTITIES

There are 13 subsidiaries within the BFG group, of which Yolarno Pty Ltd is the parent company. These subsidiaries do not have separate governance bodies, with the management and board of Yolarno Pty Ltd having oversight and control over the entire group. We consider that the engagement process established in putting together this statement was a sufficient means of consultation with the controlled entities within the BFG group.

This Statement was approved on 19 December 2024 by the Board of Yolarno Pty Ltd in its capacity as principal governing body of Yolarno Pty Ltd and the BFG group.

John Kotzur
Acting Chairman



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