



# MODERN SLAVERY STATEMENT FY2024



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This is the fifth Modern Slavery Statement to be issued by Consolidated Pastoral Company Pty Ltd (“CPC”) in accordance with the Modern Slavery Act 2018 (Cth) and applies to the financial year ending 31 March 2024.

CPC is committed to acting ethically and with integrity in our business dealings and relationships, and implementing and enforcing effective systems and controls aimed at eliminating modern slavery within our business and in our global supply chains.

CPC strives to conduct its business in an ethical, honest and transparent manner, ensuring our employees are provided with a healthy, safe and sustainable workplace. We do not tolerate any instances of modern slavery within the workplace.

## 1. Our Business

CPC is a leading Australian managed, UK owned Agribusiness with strong Environmental, Social and Governance (ESG) values. CPC owns and operates a portfolio of nine station aggregations in northern Australia and two feedlots in Indonesia. Across more than 3.2m hectares of land, the CPC team can care for more than 300,000 head of cattle and produce a diverse range of crops. With an asset base in excess of AUD\$1 billion, CPC supplies a variety of domestic and international customers.

The company also holds a 90% interest in PT Juang Jaya Abdi Alam (JJAA) which owns and operates two feedlot businesses in Indonesia, the other 10% being owned by our Indonesian Joint Venture partner.

CPC is committed to becoming a globally significant and diversified agribusiness – building on previous successes in the carbon space through formal and informal markets, securing large-scale water licences, developing large-scale cropping programs and capturing value through renewable energy sources.

## 2. Structure at 31 March 2024

CPC is owned by Guy and Julia Hands through the Hands Family Office. Terra Firma (UK) (owned by Guy Hands) is the investment manager of CPC for the Hands Family Office.

CPC Group Holdings Pty Ltd is the Australian parent company of several controlled entities in Australia including CPC. A full listing of the controlled entities is included at Annexure A. CPC is responsible for the operations of the business in Australia and the other controlled entities in Australia exist only for historical reasons. JJAA is responsible for business operations in Indonesia. For the purpose of this report, “CPC” refers to all businesses within the group.

### Operations and Supply Chain

The CPC Australian operations are located across northern Australia with 9 cattle station aggregations which breed and grow beef cattle and a diverse range of crops. CPC has a program of emissions reduction and carbon capture that is integrated into its business operations.

The administrative office is based in Brisbane, Queensland.

CPC Australia is very customer focused with its direct sales channels primarily involving selling cattle and beef to Asian consumer markets, domestic feedlots or processors, and exporting live cattle.

The Hands Family Office has strong growth aspirations for the business. Their vision is to continue evolving the business beyond the cattle and cropping operation to one which makes greater use of our land, and to take advantage of opportunities including further emissions reduction and carbon capture, renewable energy and biodiversity.

The feedlots in Indonesia are located in Lampung (South Sumatera) and Medan (North Sumatera). The Lampung feedlot has an optimal capacity of 19,800 head, while the Medan feedlot has a capacity of 7,200



head; both facilities are “best in class” operations. Cattle are sold from these feedlots to customers who process the cattle. We maintain strong links through the supply chain from feedlot to market with animal welfare and marketing officers visiting customers and processing facilities daily.

Further information on operations available at: <https://www.pastoral.com>

### 3. Risks of Modern Slavery Practices in Our Operations and Supply Chain

#### Our operations

We believe that our CPC team employed in Australia and Indonesia are at a low risk to modern slavery and consider that our HR processes, Code of Conduct and company policies further mitigate this risk. Accordingly, we believe that our greatest risk of involvement in modern slavery is being indirectly linked to it through our supply chain relationships.

#### Supply Chain

We have worked with our suppliers to continue a risk review of the CPC supply chain and identify possible exposure to modern slavery activities. We recognise that the due diligence of these suppliers is important; we aim to do business with like-minded businesses who share our values and are ethically and socially responsible.

The identified modern slavery risks we face indirectly through our supply chain relationships include:

- (i) the lack of supply chain traceability and transparency,
- (ii) externally purchased materials, products, services, and equipment (such as solar panels) from countries with a higher modern slavery risk profile; and
- (iii) contract of labour hire services provided to CPC operations which may have unfavourable employment practices.

CPC has diversified into cropping including fodder crops and cotton production, with our first commercial cotton harvest occurring in FY2023. We are broadening our supply chain enquires to consider modern slavery risks within our cotton supply chains. Our fodder crops are largely used internally and 100% remain within Australia, therefore are considered to have a low associated modern slavery risk.

We also note that the lack of supply chain traceability and transparency creates a risk with the degree of integrity to meet acceptable practices at lower levels in the chain.

### 4. Our Actions Taken to Assess and Address Modern Slavery Risks

#### Corporate Governance

CPC has a culture of strong corporate governance, with a focus on our ESG commitments and goals. One of CPC’s social goals is to work with our team at CPC, our customers and suppliers to understand and minimise the risk of modern slavery.

CPC has a comprehensive policy framework and operating procedures in place to ensure that our employees and contractors clearly understand our expectations plus also provide them with our commitments to how they will be treated at CPC. Our corporate policies are on a regular review cycle and presented to our Boards for approval as part of the review process.

The board approved CPC Anti Modern Slavery Policy was published in July 2023. A copy of this policy is available to all CPC employees and it is included in the induction documentation for all employees and contractors. The Anti Modern Slavery policy statement is available on CPC’s website.



## 4 Modern Slavery Statement

Policy/Procedure	Purpose
<b>Anti-Modern Slavery Policy</b>	Affirms CPC's commitment to addressing modern slavery practices and risks through identifying, preventing and reporting on such risks and practices within CPC's operations and supply chain.
<b>Code of Conduct</b>	Outlines a minimum set of standards and behaviour required of all CPC Employees, Contractors and Directors.
<b>Anti-Bribery Policy</b>	Affirms that CPC has never tolerated, and will not tolerate, any form of bribery and corruption within its business.
<b>Anti-discrimination, Bullying and Harassment Policy</b>	Outlines the relevant definitions, principles and obligations in relation to unlawful discrimination, bullying and harassment, as well as CPC's expected standard of conduct in these areas.
<b>Whistleblower Policy</b>	Encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving CPC and provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.
<b>Recruitment and Selection Policy</b>	To make certain that the recruitment and selection processes conducted by CPC are efficient, robust and delivered in a manner that ensures candidates are treated fairly, equitably and in a manner that is consistent with legislative requirements and stakeholder expectations.
<b>Privacy Policy</b>	Explains how CPC handles personal information.
<b>Enterprise Agreement</b>	Over 60% of the Australian team are covered by an Enterprise Agreement. Renewed in June 2021, the current agreement achieved 100% vote of support from employees.

### **Contractors/Service Providers**

The online contractor induction and evaluation process continues to be further developed to strengthen our contractor process. The online induction requires that contractors confirm that they comply with all relevant employment law and workplace health and safety legislation.

### **Our CPC team**

CPC's team of employees consists of approximately 180 employees in Australia, all engaged by employment contracts and approximately 180 full time employees and 440 part time and contract employees in Indonesia who are engaged by employment contracts or negotiated agreements.

The HR and payroll team ensures compliance to the Consolidated Pastoral Company Enterprise Agreement 2021 and employment contracts.

### **CPC Team Training**

Modern slavery training has been provided to the executive and senior management team at CPC, this training



will be ongoing. The training educated on issues including modern slavery practices, key risks, reporting requirements, identifying instances of modern slavery and how to report suspected instances. CPC is proud to develop each individual in our team, with a strong focus on leadership development and health and wellness programs for the Australian and Indonesian CPC team.

## Suppliers

Regarding the inclusion of modern slavery clauses, as contracts are due for renewal, we will work with suppliers to include modern slavery clauses as required.

We continue to use a self-assessment questionnaire for CPC suppliers of high-risk products and geographical locations, which assists in providing further information on supply chain processes regarding modern slavery and the associated risks.

The CPC Supplier Code of Conduct (Code) has been approved by the board of CPC and distributed to CPC suppliers. The Code outlines CPC's expectations of its suppliers regarding their activities in the production and delivery of goods and services supplied to CPC. The Code supports CPC's commitment to high standards of ESG responsibilities, and to promoting and supporting a culture of honest and ethical behaviour in business.

## 5. Measuring Our Effectiveness

At CPC, as our modern slavery framework matures, we will continue to review and report on the effectiveness of actions being taken to identify and assess modern slavery risks within our business operations and the supply chain. This review will occur through our risk management and assessment process, policy reviews, supply chain disclosures, site visits and team engagement and training. Reporting will be included in the annual Modern Slavery Statement issued by CPC.

## 6. Consultation with Our Controlled Entities

Within the Australian entities listed at Appendix A, only one entity is an employer and undertakes operations, being Consolidated Pastoral Company Pty Ltd, therefore consultation was not required with the other entities. All Australian entities share the same Company Secretary who has been involved in the preparation of this statement.

Our international subsidiary, JJAA, has been consulted in the preparation of the statement and Directors of JJAA have knowledge of this statement. We have discussed with JJAA the details of the Modern Slavery Act 2018's reporting requirements and have provided information on the actions we take to address these requirements and have provided JJAA with relevant materials and training.

## 7. Our Commitment

At CPC, we have a company commitment to leave the world a better place. We undertake to continue to develop and improve our modern slavery framework to advance our ability to identify and manage modern slavery risks within our business operations and the supply chain.

CPC is committed to working collaboratively with our suppliers, customers, employees and external stakeholders to increase our understanding of modern slavery risks and how we can address them.

## 8. Board Approval

This statement is our fourth Modern Slavery Statement, being for the financial year ending 31 March 2024 made pursuant to the Modern Slavery Act (2018). It has been approved by the board of CPC Group Holdings Pty Ltd in their capacity as principal governing board of CPC Group Holdings Pty Ltd on 12 September 2024.

Signed in accordance with a resolution of directors.



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Troy Setter  
Director and CEO  
Dated 12 September 2024



### Annexure A

#### Wholly Owned Subsidiaries of CPC Group Holdings Pty Ltd (ACN 644 449 758)

**Registered office:**

Newcastle Waters Station, Drovers Drive,  
Newcastle Waters, Northern Territory, Australia 0862.

Company Name	ACN
<b>Baines River Cattle Company Pty Ltd</b>	009 603 516
<b>Consolidated Pastoral Company Pty Ltd</b>	010 080 654
<b>Consolidated Pastoral Group Pty Ltd</b>	644 450 457
<b>Consolidated Pastoral Property Pty Ltd</b>	009 624 159
<b>CPC (China) Pty Ltd</b>	153 136 951
<b>CPC Exploration Pty Ltd</b>	604 035 225
<b>Crosswalk Pty Ltd</b>	009 448 739
<b>Lake Woods Acquisitions Pty Ltd</b>	134 353 192
<b>Lake Woods Group Pty Ltd</b>	134 352 104
<b>Lake Woods Holdings Pty Ltd</b>	134 351 134
<b>Laverton Nominees Pty Ltd</b>	009 639 623

#### International Subsidiary

Company Name	Country of Registration	Company Number
<b>PT Juang Jaya Abdi Alam</b>	Indonesia	8120 20372 2061





