

# FLETCHER INTERNATIONAL GROUP PTY LTD



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## Fletcher International Group Pty Ltd - Modern Slavery Statement

This joint Modern Slavery Statement (**Statement**) has been made in accordance with section 14 of the Modern Slavery Act 2018 (Cth) and is provided by Fletcher International Group Pty Ltd (ACN 626 211 907) and Fletcher International Exports Pty Ltd (ACN 003 213 652) for the reporting period 1 July 2023 to 30 June 2024.

The purpose of this Statement is to outline the approach the business is taking to minimise the risks of modern slavery across our operations and supply chains. Modern slavery is a range of serious forms of exploitation including human trafficking, debt bondage, forced labour and child labour.

For the purposes of this Statement, “Fletcher’s”, “we” and “our” collectively refer to Fletcher International Group Pty Ltd and Fletcher International Exports Pty Ltd. This Statement is a consolidated description of the actions taken to address modern slavery risks by Fletcher’s as a whole. This Statement also describes practices that are common to Fletcher’s direct subsidiaries and controlled entities (together with Fletcher’s, referred to as **the Fletcher’s Group**).

### Structure, Operations and Supply chains

Fletcher International Group Pty Ltd and Fletcher International Exports Pty Ltd are privately owned companies and are each a reporting entity as defined in the Modern Slavery Act 2018 (Cth). Fletcher International Group Pty Ltd is the holding company of Fletcher International Exports Pty Ltd and has three other direct subsidiaries which are based in the United States, the United Kingdom and India. The subsidiary based in the United States (Fletcher International USA LLC) sells Fletcher lamb and mutton meat and petfood products, sourced wholly from Australia, directly to end users in the United States market. The subsidiaries based in the United Kingdom and India were dormant and did not trade during the reporting period. Fletcher International Exports Pty Ltd has four direct subsidiaries or controlled entities, which were all dormant and did not trade during the reporting period.

Fletcher’s operates two efficient sheep processing plants strategically located in Dubbo, New South Wales and Albany, Western Australia which export the highest quality Australian processed sheep meat around the world. Together with these processing plants, Fletcher’s is a vertically integrated commodities business, operating two sheep breeding farms in Lightning Ridge and Condobolin and two lamb finishing farms in Condobolin and Beaufort River, mixed farming operations, a grain trading business and an intermodal freight terminal in Dubbo. As a compliment to the intermodal freight terminal, Fletcher’s operates a freight train service from Dubbo to Sydney.

Fletcher’s proudly employs over 1,500 team members throughout Australia who are fundamental to our operations.

Our supply chains are predominantly comprised of Australian primary producers and their agents as we purchase sheep and lambs sourced entirely within Australia. Fletcher’s purchases international container shipping freight from global container shipping companies as we export Australian processed sheep meat around the world. In addition, and to a lesser extent, grain, oilseed and pulses are purchased from primary producers, and other key inputs include packaging, utilities and maintenance products and services which are purchased mostly from Australian suppliers. Our relationships with our suppliers vary from short-term engagements to long-term contractual agreements.

### Modern slavery risks in Fletcher’s operations and supply chains

# Fletcher International Group Pty Ltd - Modern Slavery Statement

## Operations

In the processing and agricultural sectors, there is inherent risk of modern slavery due to the employment of more vulnerable workers caused by a necessary reliance on migrant and itinerant workers. Fletcher's predominantly employs team members directly, however we also work with two Australian based and operated labour hire companies for some specialised workforce components within our two sheep processing plants. During the reporting period, Fletcher's employed team members coming to Australia to work in our processing plants under the Pacific Australia Labour Mobility (**PALM**) scheme mostly through our partner for labour hire Food Industry People Group Pty Ltd. Fletcher's also directly employed team members to work in our processing plants under the Australian Government's Meat Industry Labour Agreement (**MILA**).

All abattoir production employees are covered by Enterprise Bargaining Agreements that are approved by the Fair Work Commission. Each production employee that meets the conditions prescribed in the Fair Work Information Statement is offered permanent employment on or before 6 months of paid employment, and we work very closely with our specialised labour hire companies to ensure that all team members are remunerated correctly and that appropriate accommodation (where it may be required) is provided.

Due to the current shortage of housing in rural areas, the Fletcher's Group has purchased various types of accommodation to ensure that team members coming to Australia can be offered immediate accommodation and have living arrangements that meet the requirements of accommodation per the PALM scheme and are affordable. Team members are offered this accommodation upon arrival, however are under no requirement to remain in this accommodation if they would prefer to seek other arrangements. The Fletcher's Group works to ensure that team members can access transport to and from our processing plants which are located some distance from the local towns.

## Supply Chains

Fletcher's supply chains are mainly comprised of Australian primary producers. The processing and agricultural sectors have an inherent risk of modern slavery due to the employment of vulnerable workers. However, livestock production enterprises in the sheep meat sector, as well as the grain, oilseed and pulse sectors, tend to have low employee numbers when compared to outputs. We have a large network of buyers and agents that interact directly with this, our most significant supply chain, and the Fletcher's Group assesses the risk of modern slavery in these key purchase inputs supply chains to be low.

International container shipping freight is a major input to our supply chains as we export Australian processed sheep meat directly to global markets. Our relationship with these suppliers has continued now for decades and we deal only with long established and leading businesses with an Australian representation in this space. These suppliers are also working to ensure the international shipping sector's human rights challenges are positively actioned. For our main supplier, this includes reporting annual Modern Slavery Transparency Statements under the UK Modern Slavery Act of 2015 which detail their actions in this regard.

Other significant inputs to Fletcher's include including utilities, packaging and maintenance products and services. These are sourced mainly from Australian based suppliers. In terms of our supply chains, these other inputs are a much lower level of purchasing in overall value than items noted above, and modern slavery risk is mitigated through the focus on Australian based suppliers.

## Actions taken to assess and address modern slavery risks in Fletcher's operations and supply chains

### Our policies and controls

At Fletcher's, we take pride in maintaining high ethical standards with regards to the recruitment, management and compensation of our fundamental resource, being our people. Fletcher's intention is to comply with processes within our business, and within our suppliers, that remove modern forms of slavery, human trafficking or child labour.

# Fletcher International Group Pty Ltd - Modern Slavery Statement

We are committed to working with our suppliers and other stakeholders to understand potential areas of modern slavery risk and to increase transparency. This business imperative is reflected in our development of company policies such as our:

- Anti-Modern Slavery Policy;
- Social Accountability Policy;
- Standard Supplier Terms and Conditions;
- Supplier Code of Conduct;
- Purchasing Policies and Procedures;
- Bullying and Harassment Policy; and
- Whistleblower Policy

We have set out more information on some of these policies and controls below.

## Supplier Code of Conduct

Under our *Supplier Code of Conduct*, there is the expectation that all suppliers with whom we operate are at minimum, in full compliance with the laws and regulations in the jurisdiction where they operate. Suppliers must endeavour to ensure there is no modern slavery in their supply chains and operations through internal policies, procedures and audits as governed by the laws and regulations of their jurisdiction. If Fletcher's was to be made aware of any allegations of human trafficking/modern slavery activities against any of our suppliers, we would act immediately against the supplier and report it to the authorities.

## Whistleblower Policy

Our *Whistleblower Policy* covers the processes for dealing with disclosures made by employees and stakeholders of suspected improper conduct within the Fletcher's Group in a confidential and secure manner and is intended to apply to whistleblowers in all countries in which Fletcher's operates.

Fletcher's seeks to implement the highest standards of conduct and ethical behaviour in our business activities and to promote a culture of honesty and ethical behaviour, corporate compliance and strong corporate governance.

Employees and stakeholders are encouraged to make a report under the *Whistleblower Policy* if they have reasonable grounds to suspect that a director, officer, employee, contractor, supplier, tenderer or other person who has business dealings with Fletcher's has engaged in conduct which:

- Is dishonest, fraudulent or corrupt, including bribery;
- Is illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- Is unethical or in breach of company policies or procedures (such as dishonestly altering company records or data, adopting questionable accounting practices);
- Is potentially damaging to Fletcher's, an employee of Fletcher's or a third party, such as unsafe work practices, environmental damage, health risks or abuse of Fletcher's property or resources;
- Amounts to an abuse of authority;
- May cause financial loss to Fletcher's or damage its reputation or be otherwise detrimental to the Fletcher's interests;
- Involves harassment, discrimination, victimisation or bullying, other than personal work related grievances as defined in the *Corporations Act 2001* (Cth); or
- Involves any other kind of misconduct or an improper state of affairs or circumstances.

## **Due diligence**

Recently, we participated in the EcoVadis sustainability assessment process which incorporated scores in relation to Labour & Human Rights as well as Sustainable Procurement alongside the Environment and Ethics assessments. This process assisted Fletcher's to understand areas in which we can improve in relation to other businesses and we will incorporate the learnings from this process into future innovation in our ESG process.



# **Fletcher International Group Pty Ltd - Modern Slavery Statement**

## **Current processes**

As a meat processor, Fletcher's is a highly regulated business that must be transparent across many facets of our business to operate in Australia and to export internationally. Individual business units at Fletcher's have mature and comprehensive management teams that incorporate risk management procedures.

To address modern slavery risks in our operations and supply chains, we continue to assess and update the risk management procedures in place. As a business, we ensure that we analyse and document our existing processes, and we will collaborate internally to ensure a comprehensive strategy is in place to monitor and improve risks of modern slavery within our own operations as well as in our supply chains. Documentation of a comprehensive strategy will incorporate methods for ongoing assessment of modern slavery risk as well as how to address those risks.

## **Assessing effectiveness of our actions**

Operating in a highly regulated industry and being an export business demands that we have effective internal policies and controls for many aspects of our business. These policies and controls are assessed for effectiveness through both internal and external audits.

Our processing plants are audited regularly for compliance with our customer's social accountability including:

- Sedex Members Ethical Trade Audit; and
- Costco Audit, Good Manufacturing Practices
- British Retail Consortium requirements

These audits review operational conditions with specific reference to modern slavery risks in the work practices and compensation of team members and other workers. Fletcher's is transparent on these matters for our customers' requirements as well as for the government schemes to support labour migration, and work to ensure the high level of compliance required for these audits and reviews.

The employment of labour either directly or indirectly through the PALM and MILA schemes includes stringent employer vetting, and rigorous monitoring and compliance frameworks around the support of these employees.

The effectiveness of policies and controls for Fletcher's supply chains are assessed through reviewing compliance with requests for assurance and transparency from our suppliers. We will provide reporting on these assessments of effectiveness in future statements as we work to directly address the risk of modern slavery, while acknowledging that existing processes have reduced or mitigated risks in past periods.

## **Consultation with reporting entities, direct subsidiaries and controlled entities**

This Statement was prepared in consultation with each reporting entity covered by the Statement. The Group General Manager is responsible for the Fletcher's Group's functions such as human resources, risk, ethics and compliance, legal, and environment, health and safety. As a result, consultation with each reporting entity covered by the Statement was undertaken at a leadership and functional level in the process of preparing this Statement. This included providing the Statement to the Chief Executive Officer for comment prior to it being put to the Board of Fletcher International Group Pty Ltd for review and approval on behalf of itself and Fletcher International Exports Pty Ltd.

Fletcher International Group Pty Ltd is the holding company of Fletcher International Exports Pty Ltd and has three other direct subsidiaries which are based in the United States, the United Kingdom and India. During the reporting period, the subsidiaries based in the United Kingdom and India were dormant and did not trade.

Fletcher International Exports Pty Ltd has four direct subsidiaries or controlled entities. During the reporting period, these entities were all dormant and did not trade. If any direct subsidiary or controlled entity

## **Fletcher International Group Pty Ltd - Modern Slavery Statement**

commences trading, then Fletcher's will ensure the company policies and controls are implemented to mitigate the risk of modern slavery as defined in the Modern Slavery Act 2018 (Cth) occurring in the entities' operations and supply chains.

### **Statement Approval**

This Statement was reviewed and approved by the Board of Fletcher International Group Pty Ltd on behalf of itself and the second reporting entity covered by this Statement, Fletcher International Exports Pty Ltd on 16 December 2024.

A handwritten signature in black ink, appearing to read 'R J Fletcher', written in a cursive style.

Roger Fletcher  
Managing Director of Fletcher International Group Pty Ltd