



Narasell Pty Ltd Business Name Junee Prime Lamb

ABN: 56211021320

2882 Byrnes Rd

PO Box 218

Junee NSW 2663

Ph: 02 69241230

Junee Prime Lamb

Modern Slavery Annual Statement 2024

This Statement has been made in accordance with s.16 of the Modern Slavery Act 2018 (Cth) and is published by Narasell Pty Ltd for the 2023 / 2024 financial Year.

Introduction

Narasell Pty Ltd as Trustee for the Heath Newton Family Trust operates under the business name of Junee Prime Lamb (JPL).

The purpose of this statement is to outline Junee Prime Lamb's approach to ensuring we have appropriate processes in place to mitigate the risk of modern slavery in our operations and supply chain.

Modern slavery is a systemic, global issue. In this statement we refer to "modern slavery" as an umbrella term, capturing the many and complex crimes, including all forms of human trafficking, forced labour, debt bondage, other slavery and slavery like practices, and the worst types of child labour. While child labour takes many different forms, some forms are considered the worst forms of child labour because of the increased risks of slavery, trafficking, illicit activities and likely harm to their health, safety and morals.

Junee Prime Lamb promotes and respects human rights as outlined in the Universal Declaration of Human Rights and the UN Sustainable Development Goals and The Australian Modern Slavery Act 2018 has been the catalyst to review and strengthen our strategy and identify opportunities to partner with our suppliers, customers and other stakeholders, on the eradication of modern slavery.

Junee Prime Lamb's desire for compliance throughout the business and via our suppliers to ensure there is no exposure to modern forms of slavery, human trafficking or child labour is reflected in the company policies which include but are not limited to:

- Equal Opportunity, Discrimination, Diversity and Inclusion Policy
- Child Labour Policy
- Labour Hire Provider Policy and Procedure
- No Forced Labour Policy
- Wages and Working Hours Policy
- Responsible Sourcing Policy

Structure, Operations and Supply Chain

Junee Prime Lamb primarily operates a sheep meat processing facility located near the Australian regional township of Junee in southern NSW. Additionally, JPL operates

two farming operations which support the meat processing facility. The first farm operation is located near the township of Narrandera and the second farm operation is located in proximity of the township of Junee but does not adjoin the meat processing facility. The farming operations are focussed on cropping and livestock facilities

The Junee farm operation is primarily focussed on the protection of the health and wellbeing of livestock being transferred from regional selling centres to Junee for processing. Additionally the Junee farming operation is focussed on the treatment of wastewater via a water recycling facility so that the water can be utilised for cropping activities and the production of fodder for livestock use.

JPL supplies product to the domestic market including supermarket chains, restaurant and meal wholesalers and butcher shops located both regionally and in metropolitan areas, and also to export destinations such as USA, Canada, China and Korea. Additionally, JPL provides a processing service to a large Australian supermarket chain.

The key elements of the supply chain include:

1. Supply of livestock.
2. Employment and labour.
3. Freight by road, sea and air.
4. Packaging material (primarily cardboard boxes and cryovac material).
5. Electricity, gas and water.
6. Fodder and additives.

Risks of Modern Slavery Practices in the Supply Chain

Potential risks of modern slavery in the supply chain primarily include:

1. Origination of livestock – labour on livestock farms.
2. Recruitment and sourcing of labour in the processing operations.

Assessment and Address of Risks

1. Origination of livestock – labour on livestock farms.

The International Labour Organisation ranks agriculture as having the fourth highest number of confirmed forced labour cases out of all industries. Workers within the agriculture industry are highly vulnerable to modern slavery because of the nature of the work involved in production, processing, packaging and transport of food.

The definition of modern slavery also includes the worst forms of child labour. Examples of the worst forms of child labour include children working with dangerous tools and equipment or with chemical substances (e.g. pesticides for crops), not having appropriate safety equipment to keep them protected or being forced to work in extreme conditions. In many countries around the world, the risk of child labour is also particularly present in agriculture, with 60% of all child labourers in the age group 15-17 years working in agriculture. This is driven by poverty, limited or no access to education and inadequate agricultural technology.

Junee Prime Lamb's direct livestock is primarily sourced from local regionally based Australian growers of livestock. Typically these operations are not labour intensive and are not considered high risk. Additionally, the majority of livestock is sourced from local government managed livestock selling centres and through registered livestock agents. As a result, our assessment indicates that there is a low risk of modern slavery (including child labour) in this portion of the supply chain.

Junee Prime Lamb also directly employs workers engaged in its farming operations and does not employ persons under the age of 17 years and all people are paid in accordance with relevant award agreements.

Despite these factors, JPL acknowledges the potential for such practices to exist in Australia.

2. Recruitment and sourcing of labour in the operations.

As a result of the somewhat tumultuous conditions of the last two to three years Junee Prime Lamb has suffered greatly from labour shortages and difficulties in sourcing appropriate labour. The restriction associated with sourcing labour from China and similar Asian countries has meant that JPL has had to direct its labour sourcing primarily to the Pacific Australia Labour Mobility (PALM) Scheme.

Unfortunately, the initial implementation of that scheme meant that labour could not be directly sourced and employed by JPL. Therefore JPL was required to engage the only licensed PALM scheme employer as a Labour Hire Provider. Under the PALM scheme most workers were entitled to remain in Australia for a minimum of three years.

As the PALM scheme developed JPL was eventually able to become an Approved Employer and recruit and directly employ its own personnel. However, JPL also needed to observe the three year engagement period for the labour hire personnel.

JPL adopted the policy of directly recruiting and employing personnel engaged under the PALM scheme and continues this strategy as it believed this was the most secure manner of ensuring personnel were recruited and appropriately paid under Australian labour law.

Whilst the PALM scheme was the primary source of new labour there were also other relatively minor sources of labour through other labour hire companies. JPL engaged with approximately five other relatively small labour hire companies, some of which provided as few as two or four employees depending on technical needs of the business. JPL engaged on checking visa and work entitlements for most of these labour hire companies.

However, JPL progressively arrived at the decision that they would endeavour to eliminate the labour hire companies and directly employ workers to ensure the integrity and correct treatment and payment of these personnel. This strategy is still in progress.

Pay parity for all workers, whether directly employed or hired via labour hire providers is strictly enforced.

3. External Audit

June Prime Lamb engages a SEDEX – Sedex Members Ethical Trade Audit (SMETA) annually. The scope of this audit is very comprehensive and covers a wide range of issues many of which are referenced closely with Modern Slavery issues.

Remediation Processes

Should any breach, or potential breach, of the Modern Slavery principles be identified the issue will be addressed immediately with the relevant party. An appropriate period of time will be allocated in which the issue must be addressed, and the impacted party compensated if required. The offending party will receive written notice of the issue and will be advised that if the matter is not corrected within an acceptable period then contractual arrangements will be terminated. The offending party will also receive written notice that any repeat of the breach will result in immediate termination of the contract. JPL will require proof that the issue has been appropriately addressed and will conduct audits to ensure there are no repeated incidents.

The effectiveness of such actions will be assessed by requiring further regular reviews of documentation to prove that breaches do not reoccur.

Modern Slavery Statement Approval:

This Modern Slavery Statement is approved by the principal governing body of Narasell Pty Ltd being Mr. Heath Newton, Sole Director. The statement is approved on 29th August 2024 and is signed below by the sole managing director.



.....

Heath Newton

Sole Director

Narasell Pty Ltd

29/08/24