



MODERN SLAVERY STATEMENT

D'Orsogna Limited (ACN 063 427 752)
Financial Year 2022-2023

This Modern Slavery Statement is prepared and issued by D'Orsogna Limited, ACN 063 427 752 (herein after referred to as D'Orsogna) and is made pursuant to the Modern Slavery Act 2018 (Cth) in respect of D'Orsogna and refers to the period 1 July 2022 to 30 June 2023.

This is D'Orsogna's fourth Modern Slavery Statement.

MESSAGE FROM THE MANAGING DIRECTOR

Dear Stakeholders,

D'Orsogna Limited continued to evolve its maturity to address modern slavery risk in FY 2023.

We set ourselves a goal to improve our modern slavery program at D'Orsogna Limited. There is a significant global trend towards greater transparency, human rights-related reporting requirements, and business accountability.

D'Orsogna Limited's approach to identifying and managing the risk of modern slavery is guided by our commitment to respect human rights across our operations and supply chain. In our fourth annual Modern Slavery Statement, we are pleased to be able to report progress across the key areas by improving on business practices, including stakeholder engagement, monitoring, and human rights risk assessment.

During the period, D'Orsogna Limited has committed to improving processes and to partner with suppliers and business partners which share our values of meeting human rights obligations and oppose to all forms of slavery and forced labour in its operations and the operations of its suppliers

We recognise that we need to continue to make improvements to ensure that we continue to work towards eliminating modern slavery risks within our business. This shall be an area of continued focus in the next reporting period.

We shall continue to monitor, report and action any failures, report on successes and continue our commitment to improving our practices within our operations.

This Statement was approved by the Board of Directors of D'Orsogna Limited.

Jason Craig
Managing Director and Chief Executive Officer
19 January 2024



INTRODUCTION

A. About our business

D'Orsogna is an Australian owned and operated food manufacturing company employing over 750 employees in Western Australia (Head Office) and Victoria. D'Orsogna's core business is the production and distribution of a range of cured and cooked whole and sliced hams, gourmet continental goods, bacon and cooked sausages across Australia.

D'Orsogna is a single entity and operates primarily in the retail industry selling D'Orsogna branded and private label products for sale through various national supermarket supply chains within Australia, including Woolworths, Coles, Costco, Aldi and Metcash.

B. Key policies and principles to manage modern slavery risks

We stay informed of proposed amendments to the Modern Slavery Act including any additional measures required to address the issue in Australia and overseas. We are also committed to continuously improving our approach and to improving responsible sourcing practices.

D'Orsogna recognises that the risks relating to suppliers will vary depending on their industry and geographic location. The scope of D'Orsogna's suppliers' policies, processes and systems are expected to reflect the specific risks pertinent to that business.

D'Orsogna's core values were developed and endorsed by D'Orsogna's Management and Board of Directors. These core values were communicated, actively promoted and monitored throughout our business and in our business relationships with our suppliers and customers.
































Our Mission Statement

"With a proud history and heritage, D'Orsogna is committed to excellence in all we do, from the food we produce to our relationships with employees, customers, partners, consumers and shareholders.

We achieve this through the highest levels of Safety, Quality, Innovation, Respect and Integrity."

During the reporting period D'Orsogna continued to engage with business of goods and services that have a similar value system and business ethic, which includes respect of human rights and sustainable business practices. D'Orsogna recognises that as a large purchaser of goods and services, the values and ethical practices of its suppliers can have a significant impact on our performance and reputation within the communities in which we operate.

In order to promote and monitor ethical behaviour in our operations, during the reporting period, we continued on our journey to improve policies, procedures and processes. During this process it was recognised that a separate Supplier Code of Conduct was required and is in progress to be finalised and communicated in addition to an improved process dealing with an identified modern slavery issue.

Policies, Procedures & Processes	Undertaken
Ethical Conduct & Sourcing Policy	  
Procurement Policy <i>which currently includes supplier code of conduct</i>	  
Preferred & Approved Vendor SOP Register	  
Risk Management Policy	  
Whistle Blower Policy	  
Employee Code of Conduct	  
Employment Policy <i>which includes labour hire management</i>	  
Grievance Policy	  
Vendor Contracts renewal includes reference to ethical practices	  
Business Partner Requirements include reference to modern slavery compliance	  
Supplier Code of Conduct – Separate Code to the Procurement Policy	

 Updated	 Reviewed	 Re-communicated	 In Progress New
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C. In our internal operations

In the 2023 financial year, D’Orsogna continued to review the risks of modern slavery in our operations. The risk within our internal operations was assessed as being low.

D’Orsogna has cooperated positively in all audits of our Business including Sedex Members Ethical Trade Audit (SMETA) which was performed in August 2022 and February 2023. The audit tested the four key areas: labour standards, health & safety, environment and business ethics.

The modern slavery risk was assessed as low due to the following factors:

- Dedicated Human Resources Department led by the HR Manager who is part of the Senior Management Team.
- Human resources controls and processes in place, including:
 - Whistle Blower Policy which includes anonymous reporting to third party
 - Inductions and on-boarding of new employees. This includes providing information on employee wages, employment conditions, rights and entitlements.
 - Audit compliance in relation to ensuring our employees all have work rights, old enough to work and working at D’Orsogna Ltd at their own free will.
 - Employees have access to unions, consultation and grievance raising mechanisms.
 - Company is required to meet Compliance with Australian Employment laws and external auditing is conducted to ensure we meet compliance and employment standards.
 - Robust Safety and Health system in place to ensure the health and welfare of our employees.
 - Anonymous internal grievance reporting tool easily available via apps and surveys.

MODERN SLAVERY ACT 2018 COMPLIANCE

Risk management and due diligence processes

D'Orsogna continued its journey and recognises that through its supply chain it can be directly or indirectly exposed to the risk of modern slavery including human trafficking. In order to mitigate these risks and achieve compliance with the Act, the company has taken the following actions during the reporting period:

- Continued during the period to further develop and improve on D'Orsogna's Preferred Vendor Program which is monitored through the company's Quality Management System to manage risk within our supply chain relationships.
- Reviewed and amended key policies including the Ethical Conduct/Sourcing Policy and the Procurement Policy to improve on our risk management processes.
- Reviewed the vendor list to identify any new risks
- Reviewed all vendor and supplier related procedures to ensure consistent messaging.
- Modern Slavery Act 2018 compliance was an agenda item at both Senior Management and Board meetings.
- Provided information and training on the key policies to key stakeholders within the business.
- Transparency in relation to the country of origin of our main raw material providers including disclosure on our website.
- Investigated technology options to improve the compliance program within the business. This will be rolled out in the next reporting period to replace manual methods.

SUPPLY CHAIN

A. Analysis of supply chain to identify risk

Our supply chain relationships include suppliers/vendors from the following sectors:

- Information, technology & Communications
- Maintenance services and parts
- Security services
- Logistics
- Dry goods and packaging procurement (2)
- Raw meat procurement (1)
- Office supplies
- Personal protective clothing/protective equipment
- Medical supplies
- (1 and 2) Top supplier group

B. The process

Internal modern slavery Risks

During the reporting period we conducted an internal audit of our employment practices and grievance reports to identify any modern slavery issues within our own operations. We met all Australian laws. This was an important part of the process as we employ individuals where English is a second language and visa workers who may be deemed as vulnerable workers. During the period, we participated in SMETA audits conducted by external auditors which tested our own business practices based on the Ethical Trade Initiative (ETI) Base Code of the International Labour Organisation.

External modern slavery risks

Due to some major suppliers being located overseas we recognise that risks do exist within our supply chain.

During the reporting period, conducted the following activities:

- Conducted a review of vendors on the current preferred vendor list to identify potential modern slavery risks and updated key contact information.
- Conducted a review on actual spend for the 2024 financial year by supplier, then ranked our suppliers from highest to lowest spend.
- Re-Issued paper based questionnaires to new or proposed vendors in order to conduct a risk assessment. The process included having the supplier advise of any other third party suppliers within their supply chain. During this process, we recognised that we needed to improve in this area in order to improve our risk assessment and corrective actions processes and therefore we plan to go digital. New technology has improved risk assessment tools.
- Updated the Supplier Risk Register and Preferred Vendor Register to be current and identified the supply chain risks in regards to modern slavery.
- Monitored any news/announcements in relation to our vendors on any ethical issues being reported.
- Required improved supplier contract review process to ensure that relevant clauses with respect to human rights and relevant measures against modern slavery were included in the supplier's obligations.
- Reviewed risk assessment criteria to ensure it was current.
- On review of data for the reporting period, most of D'Orsogna's direct supply chain spend continues to be with meat suppliers, who are located in Western Europe, Australia and North America. This is followed by packaging materials spend some of which is sourced from Asia.

C. Effectiveness of actions taken

During this reporting period, our focus was to continue our journey on a better understanding of our modern slavery risks and how these risks may present in our operations and supply chains.

Our review of the current reporting period identified that we need to further improve on our review and assessment process to allow us to adequately assess the full effectiveness of the measures we have implemented and undertaken.

We are in the 4th year of the implementation of the Modern Slavery Act of 2018 and we recognise that our review and assessment process has limitations in identifying and addressing all of our modern slavery risks within our operations and across our supply chain as some of our major suppliers are located overseas. Not all suppliers provide the required information for D'Orsogna to make all of our assessments in a timely and informative manner.

We are committed to continue to improve our review and improvement process which will include investment in technology in order to improve data collection and risk assessment tools.

We believe that the involvement of our Senior Management Team and the Board of Directors is fundamental to the ultimate success in the implementation of the Modern Slavery Act of 2018 by "leading from the top down". Modern slavery risks are incorporated into our business risk matrix. These risks will be discussed and addressed at a designated Board sub-committee and at Management meetings.

The clear expectation is that each area of the business is responsible for identifying and assessing their own operations and supply chain for human rights risks and to implement appropriate controls with the support of our risk management team.

To support our teams it is planned to improve the procedures to include a specific procedure for addressing and responding to modern slavery based non compliance on where the issue has been found geographically.

RISKS OF MODERN SLAVERY PRACTICES IN D’ORSOGNA’S OPERATIONS AND SUPPLY CHAINS

A large portion of our supplier and procurement spend continues to be with suppliers based in countries, like Australia and Denmark, that have a lower risk of having modern slavery practices as identified by the Global Slavery Index (GSI).

However, there are some suppliers that fall into the higher modern slavery risk category. Whilst geography is only one factor used in assessing the overall risk of a supplier, it is an important factor. The key challenge in addressing the risks identified is the ability to source alternate suitable suppliers to be able to produce what is needed to run our operations.

The Modern Slavery program is still a work in progress as not all modern slavery risks have been eliminated.

FUTURE ACTIONS TO BE TAKEN TO ADDRESS MODERN SLAVERY RISKS

D’Orsogna is committed to continuous improvement in the area of modern slavery therefore a number of actions including training and awareness will be conducted over the next reporting period.

Actions planned

- Implementation of technology based system to improve collation of information, analytics and improve risk assessment process.
- Improve documented process on dealing with an identified Modern Slavery Issue within our operations
- Team members who deal with our suppliers will be required to complete a 6 module training program that will cover modern slavery and ethical sourcing via professional body if not yet completed.

1	<i>Engaging with the issue of modern slavery</i>
2	<i>Responsible sourcing and purchasing</i>
3	<i>Identify and manage modern slavery risks</i>
4	<i>Developing policies to manage modern slavery risks</i>
5	<i>Measuring the effectiveness of actions taken to address modern slavery</i>
6	<i>Taking the ethical implications of modern slavery risk beyond the process</i>

- Continuous review of Supplier Contracts to ensure that suppliers meet the supplier code of conduct.
- Refresher Training Program on modern slavery risks
- Continue with information collation and risk assessment process via improved system.
- Investigate the use of third parties, such as SEDEX or Modern Slavery platforms or applications, to assist with data collation and compliance with our procedures for all suppliers including those that are overseas.
- Internal worker education on key employment rights and minimum conditions.
- Continue with internal auditing processes.
- Training programs on employment related policies and procedures for our internal management team.
- Continue to participate in SMETA audits and promptly resolve issues requiring corrective actions.

REMEDIATION

Where a legitimate modern slavery concern or issue is raised, through one of our grievance mechanisms, we are committed to work with our suppliers, Government and worker representative bodies to ensure an appropriate remedy is provided.

Our grievance mechanisms

We respect the rights of individuals therefore to support this we provide a number of grievance mechanisms.

A. Whistle Blower Policy

Our Whistle Blower Policy encourages the reporting of any suspected unethical, illegal, fraudulent or undesirable conduct, including suspected adverse impacts on people, communities or the environment within our supply chain. The Whistle Blower Policy includes a website link and external hotline number managed by an external contractor, Your Call, who monitor and provide quarterly reports.

B. Internal Grievance Procedures

The company has an internal Human Resources Department and a documented grievance procedure. We communicate this grievance procedure through inductions, re-fresher inductions and visible printed copies on noticeboards and via the company intranet. The procedure includes the process of accessing union support, government bodies such as Fair Work Australia if the remedy is found to be unsatisfactory for employment related issues or Worksafe Australia in the case of safety related grievances.

This Modern Slavery Statement is prepared in accordance with the criteria set out in the Modern Slavery Act 2018 (Cth).