



MODERN SLAVERY STATEMENT 2023

A joint statement for SunPork Pty Ltd,
SunPork Fresh Foods Pty Ltd and
Swickers Kingaroy Bacon Factory Pty Ltd.



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Registered Office:

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OUR JUST CAUSE: SUNPORK GIVES MORE THAN WE TAKE.

AT SUNPORK WE HAVE A MISSION. WE GROW PASSION FOR PORK THROUGH OUR PEOPLE, OUR PROCESSES AND OUR PRODUCTS.

AT SUNPORK WE HAVE A VISION. MORE PEOPLE CONNECTED WITH SUNPORK AND OUR PRODUCTS.

CEO STATEMENT



I am pleased to present SunPork's fourth Modern Slavery Statement.

The SunPork team have a mission to grow passion for pork through our people, our processes and our products.

SunPork's ability to achieve this passion is reliant on our customers and consumers having confidence that our complete Supply Chain, both internally and externally, is socially responsible which includes eliminating risks of modern slavery.

At SunPork, one of our values is Unity – we describe this as 'Together, everyone achieves more'.

As you go through our FY23 report you will understand the progress SunPork has made towards eliminating modern slavery risks from our supply chain including our suppliers and how this value of **Unity** sets the foundation for us and our suppliers to work together to eliminate the risk of modern slavery.

Our initiatives within this report continue on with the same structure outlined in our previous report, where we develop and achieve outcomes that focus on:

1. Prevention – Actions that aim to prevent modern slavery at SunPork and in our Supply Chain.
2. Protection – Actions that aim to protect our people including at SunPork and in our Supply Chain.
3. Remedy – Actions that allow people to file grievances and participate in the process to make them right.

I am confident our action in this report continues to build on the progress SunPork has made not only within our business but also to our external Supply Chain.

SunPork believes there is nothing more important than the respect of everyone's fundamental human rights to dignity, equality and liberty.

A handwritten signature in black ink, appearing to read 'R. van Barneveld', with a large, stylized flourish above it.

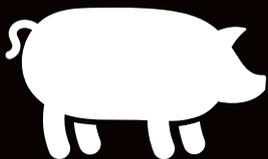
Dr Robert van Barneveld
Group CEO and Managing Director

SUNPORK AT A GLANCE

The SunPork Group is wholly Australian owned by the Queensland based Cameron, Hall and McLean families.

We produce more than 20% of Australia's fresh pork.

We operate 48 Australian farms and 16 ancillary sites in 4 states and 8 New Zealand farms.



We produce 1,100,000 pigs per year.

We have more than 52,000 sows. This means we have at least 550,000 pigs on our farms every day.



Staff 1,550+

We employ more than 1,150 staff in rural and regional communities plus another 200 in the city.



Swickers processes 1.2 million pigs per year.

This equates to 95% of all Queensland pork production.

1.

IDENTIFY THE REPORTING ENTITY

This Modern Slavery Statement ('the statement') has been developed in accordance with the Commonwealth's Modern Slavery Act 2018 for the financial year ending 30 June 2023 (FY23).

With shared supply chains, this statement has been prepared by SunPork Group and is a joint statement for three entities:

1. SunPork Pty Ltd (ACN 059 168 786) and its wholly owned and controlled subsidiaries.
2. SunPork Fresh Foods Pty Ltd (ACN 135 230 545) and its wholly owned and controlled subsidiaries.
3. Swickers Kingaroy Bacon Factory Pty Ltd (ACN 009 678 693) as a member of the SunPork Group.

Swickers Kingaroy Bacon Factory Pty Ltd does not meet the consolidated revenue requirement however, as part of the SunPork Group will report voluntarily.

This statement is intended to meet the requirements of section 16 of the Modern Slavery Act 2018 (Cth). It outlines the steps taken by SunPork Group during FY23 to minimise the risk of modern slavery occurring in our businesses and supply chains.

To find out more about the nature of our business, you can visit: sunporkgroup.com.au

This statement was approved by the Board of SunPork Group including reporting entities SunPork Pty Ltd, SunPork Fresh Foods Pty Ltd and Swickers Kingaroy Bacon Factory Pty Ltd on 14 December 2023.



2.

STRUCTURE, OPERATIONS AND SUPPLY CHAINS

SunPork Group is Australia’s largest pork producers and is 100% Australian-owned.

We produce exceptional pork products with superior genetics and sustainable farming practices to deliver only the best quality pork for Australia.

We operate 48 Australian farms and 16 ancillary sites in 4 states (Queensland, New South Wales, South Australia, Victoria) and 8 New Zealand farms on two islands. We employ over 1550+ people, with most staff employed in rural and regional communities across Australia and 2% of SunPork’s animal care staff are proudly on the autism spectrum.

We process 39% of all pigs in Australia across two abattoirs and two value-add facilities. SunPork products are produced and processed in Australia with distribution to domestic and international markets. Annually, we supply 80 million kilograms of pork, including 52 value-add products, distributed to 1,700 supermarkets. In addition, we export 10 million kilograms of pork to at least seven countries.

Through our own organisation and external supply chains, we source genetic and raw materials, components and services. Our supply chain comprises the procurement of pork production and processing inputs which are then transformed into SunPork’s three main product categories – pork, genetics and processing by-products.

In FY23, the SunPork Group interacted with more than 2,000 external vendors across our supply chain under the following categories:

- Labour and corporate services
- Animal feed and health nutrition products
- Packaging products
- Engineering, construction and fabrication services
- Maintenance spares and services
- Energy and Utilities
- Transport services
- Operations support services
- Marketing and cold-chain distribution services

Our procurement model is both centre-led and decentralised. High volume, high spend category purchases are mostly centre-led, while site-specific purchases are decentralised where subject matter experts hold responsibility for departmental purchases.



ALLIED
GRAIN SYSTEMS



ALLIED
GRAIN SYSTEMS

3.

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

We are committed to continuously improving our risk identification capability which is assessed by our Working Group members in consultation with category specialists within the business and our broader Supply Chain.

In FY23 we committed to expanding our Working Group to a cross-section of employees from our varying business units to ensure the full supply chain experience is captured. SunPork recognises that addressing risks in the supply chain requires a long-term commitment and it will continue to be an ongoing and evolving process in the years to come.

Potential Modern Slavery Risk or Potential Indicators of Modern Slavery	Sectors or Industries at Higher Risk
<p>Internal Supply Chain (Our Operations)</p> <ul style="list-style-type: none"> • Exploitation of migrant workers • Deceptive recruitment • Underpayment of wages • Excessive working hours 	<p>Internal Supply Chain (Our Operations) Functions within SunPork at higher risk:</p> <ul style="list-style-type: none"> • Labour Hire - Farms and processing facilities
<p>External Supply Chain (Our Suppliers)</p> <ul style="list-style-type: none"> • Exploitation of migrant workers • Deceptive recruitment • Underpayment of wages • Excessive working hours 	<p>External Supply Chain (Our Suppliers)</p> <ul style="list-style-type: none"> • Grain • Animal nutrition and health products • Value-add processing ingredients • Packaging • Construction • Electronics • Storage and distribution • Transport • Trade services • Labour Hire • Uniforms • PPE

4.

ACTIONS TAKEN IN FY23 TO ASSESS AND ADDRESS THOSE RISKS

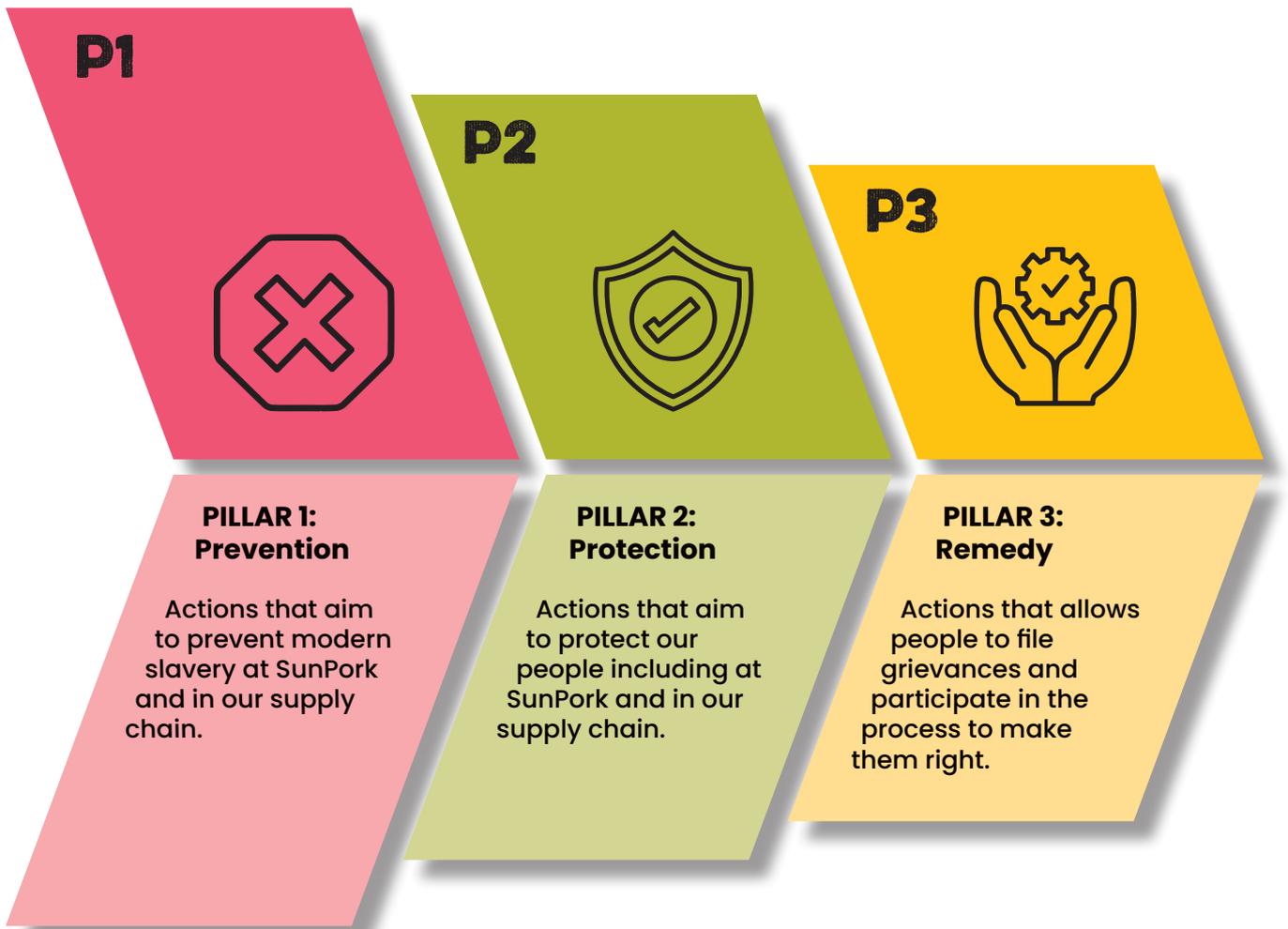
SunPork Group is a socially responsible business committed to complying with national labour standards and promoting safe and appropriate work conditions across our business and throughout our supply chains.

Whilst we are an Australian owned agriculture and fresh food entity our supply chains are global and we are committed to continuing to ensure that all reasonable action is taken to mitigate modern slavery through not just our internal but also our external supply chains.

We appreciate the magnitude of this issue and acknowledge that addressing these risks requires a long term and collaborative strategy.



All actions taken in FY23 advance one of our primary pillars of Prevention, Protection or Remedy.



In FY23 we continued to advance our protection measures to ensure all reasonable steps were taken to prevent modern slavery from entering our supply chain.

We also shifted to focus on Remedy, with the United Nations Guiding Principles as a blueprint we strived to ensure that there was an appropriate grievance mechanism and support systems in place for our employees, their families, and our broader business connections.

We acknowledge that the success of our modern slavery program will be dependent on how we measure the implementation of our planned program of work and our ability to refine our approach as and when required.

The action taken in FY23 will continue to be reviewed and built upon in the years to come as SunPork continues to strive to mitigate any adverse impacts on human rights.

ACTIONS

SUNPORK'S FY23 ACTIONS INCLUDED:

Prevention Actions

ACTION 1:

Expansion of Working Group

In FY22 SunPork formed a cross-functional Working Group to set strategic goals and to oversee identification and risk assessment initiatives. In FY23 the Working Group resolved to expand its membership to include a cross-section of employees from our varying business units so that we ensure the full supply chain, and the experience of all employees is utilised to mitigate modern slavery risks throughout our business.

ACTION 2:

Responsible Contractor Management

In FY23 SunPork implemented a contractor induction process which on request requires Contractors engaged by SunPork to demonstrate their commitment to identifying and mitigating the risk of Modern Slavery throughout their supply chain.

Where applicable Contractors are requested to provide their latest Modern Slavery Report and directed to a short online course about Modern Slavery to draw their attention to any unknown risks which may be present in their supply chain.

ACTION 3:

Labour Hire Employee Accountability Audits (Internal and External)

Our Modern Slavery elimination and mitigation practices extend to ensure our Local Labour Hire Providers are meeting the standards we require. This year we undertook an audit on all of our Local Labour Hire providers with the purpose of being able to validate that their practices in the treatment of employees meets that standard we require at SunPork.

No concerns or risk areas were identified within this process.

ACTION 4:

Human Ethics – continued participation in human rights reporting and assessments

Through members of our internal supply chain, we reported under.

(i) Sedex Members Ethical Trade Audit (SMETA)

(ii) Intertek Social Accountability Audit

which requires us to demonstrate our commitment to respecting human rights in our operations and we have successfully demonstrated compliance in Australia.

ACTION 5:

SunPork Modern Slavery Training Program – Deployment to key purchasing officers/ purchasing decision makers

As an extension of our Pilot Training Program launched last year, this year we have extended training to staff who have decision making authority in relation to placing orders and choosing suppliers with the outcome being these personnel having a greater awareness of identifying risks of Modern Slavery in our Supply Chain network.

This training was undertaken online and completed by an additional 23 employees across the SunPork Group.

Protection Actions

ACTION 6:

Employee Accommodation

SunPork operates more than 40 farm sites across regional and rural Australia in which some of these locations provide accommodation for our employees and their families.

In the previous year Procedures and Templates were established to ensure a framework that assists in the management of housing facilities.

This year this framework has been embedded further across our employee accommodation with inspections and audits to ensure that standards were maintained.

ACTION 7:

Corporate Policy Development

Following the United Nations Guiding Principles on Business and Human Rights (UNGP), SunPork continues to strengthen Group-wide internal policies and procedures. In FY23 SunPork focused on UNGP 31 to ensure there was an accessible and equitable grievance mechanism in place for all members of the SunPork Group.

In FY23 we implemented our revised *Whistle Blower Policy*. The objectives of this policy are to encourage employees to disclose details of any reportable conduct, to provide protection for employees to do so and to ensure that any disclosure is thoroughly and appropriately investigated.

Other policies reviewed and updated in FY23 include Preventing Sexual Harassment, Bullying and Discrimination Policy.

Remedy Actions

ACTION 8:

Employee Assistance Program (EAP)

In FY22 we reported on the impending launch of a SunPork Employee Assistance Program (EAP) through Converge International.

In FY23 the EAP was implemented which allows each employee access to 4 hours of short-term counselling and coaching per year to assist with dealing with any challenges, concerns or issues that may be affecting a staff member at work or at home, at no cost to the employee.

The EAP has been extended to family members of employees and is highly accessible with appointments being conducted over the phone or face to face to suit the preference of our staff and their families.

ACTION 9:

Stopline

SunPork have established a partnership with Stopline to create an avenue for anyone within the SunPork Group, our contractors, or other stakeholder to report any issue which may adversely affect SunPork or its people.

Matters which can be reported to Stopline include any breach of the Company's code of conduct and related policies, any alleged criminal offence, breach of legal obligation, unsafe behaviours and Modern Slavery breaches.

The reporting is managed by an independent consultant and the individual reporting such behaviour has the choice to remain entirely anonymous. This process is underpinned by our established Whistleblower Policy.

**SUNPORK
GROUP IS A
SOCIALY
RESPONSIBLE
BUSINESS
COMMITTED
TO COMPLYING
WITH NATIONAL
LABOUR
STANDARDS AND
PROMOTING
DECENT WORK
CONDITIONS
ACROSS OUR
BUSINESS AND
SUPPLY CHAIN.**





5.

CONSULTATIVE PROCESS ACROSS SUNPORK GROUP

As previously outlined, SunPork are developing and implementing consultative mechanisms which encourages cooperation and engagement of all our employees.

In FY23, we continued with our Employee Engagement Survey that saw the highest number of surveys completed within the group ever. As an output of this survey the leadership and their teams build action plans that address opportunity areas with the result being to increase engagement.

In addition to this, throughout FY23 there were consultative meetings that incorporated both team members and leadership that discussed and focused on people and processes, again with the intent to increase our engagement.



**WE GROW PASSION
FOR PORK THROUGH
OUR PEOPLE,
OUR PROCESSES
AND OUR PRODUCTS**





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sunporkgroup.com.au