



Modern Slavery Statement FY2025

Hellere Group Holding Limited



## Section 1: This Statement

This is Hellers Group Holdings Limited's (Hellers Group) Modern Slavery Statement for the financial period 1 July 2024 – 30 June 2025 ("the reporting period"). It is our fourth Modern Slavery Statement.

This Statement was prepared in accordance with the *Modern Slavery Act 2018 (Cth), Australia* (the Act). As Hellers Group takes a whole of organisation approach, this report identifies the steps taken by Hellers Group (Hellers Group Holdings Limited, New Zealand, and its controlled entities, including those carrying out business in Australia) to assess and address modern slavery risks in our operations and supply chain. Our structure is explained in the "About Hellers" section.

This Statement is a Joint Statement pursuant to section 14(1) of the Act, made by Hellers Group Holdings Limited on behalf of HLRS Holdco Pty Ltd, HLRS BidCo Pty Ltd and Hellers Australia Pty Limited (collectively referred to as Hellers Australia). The reporting entities covered by this Statement are:

- HLRS HoldCo Pty Ltd (holding company, ABN 32 628 433 134)
- HLRS BidCo Pty Ltd (holding company, ABN 37 628 177 266)
- Hellers Australia Pty Limited (trading company, ABN 17 627 366 750)

This Statement also covers risks and actions in relation to the New Zealand trading entity, Hellers Limited (Hellers NZ), which is not a reporting entity for the purposes of the Act. References to "our" and "we" in this Statement are references to Hellers Group, including the reporting entities (above) and Hellers NZ. The approach and associated policies and procedures for managing modern slavery risk are consistent across Hellers Group, across both Australian and New Zealand companies.

The following table sets out where key mandatory criteria of the Modern Slavery Act are addressed within this Statement.

Section	Mandatory Criteria	Page
6(1)(a)	1 Identify the reporting entity	1
16(1)(b)	2 Describe the structure, operations and supply chains of the reporting entity	3
16(1)(c)	3 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entity that the reporting entity owns or controls	6
16(1)(d)	4 Describe the actions taken by the reporting entity to assess and address modern slavery risk	12
16(1)(e)	5 Describe how the reporting entity assesses the effectiveness of such actions	18
16(1)(f)(i)	6 Describe the process of consultation with: (i) any entities that the reporting entity owns or controls	18
16(1)(g)	7 Include any other information that the reporting entity considers relevant.	N/A

## FY2025 Highlights and Chief Financial Officer's Message

As Hellers enters our fourth year of modern slavery reporting, we are pleased to set out progress made in meeting the goals set out in our 2021 Modern Slavery Action Plan. We recognise our responsibility to respect human rights and address risks of modern slavery in our business and supply chain.

Our approach to modern slavery focuses on working with our staff and our suppliers to raise awareness, assess and address risks and embed standards across our business. Our approach is guided by the International Bill of Human Rights, the International Labour Organisation's (ILO) core conventions, and the UN Guiding Principles on Business and Human Rights (UNGPs).

Hellers are committed to addressing our modern slavery impacts and risks and we have continued to take action to strengthen our approach throughout the reporting period. Highlights of our work in this reporting period include:

### Governance

- Commenced standardising our procurement practices across different functions in Australia and New Zealand
- Added modern slavery into our corporate risk register and defined risks and controls
- Conducted a review of relevant policies across the business

### Due diligence in our operations and labour hire

- Transitioned from labour hire to directly employed workers in our Jandakot site
- Significantly reduced our reliance on labour hire in Australia.
- Conducted 'SMETA' audit (which includes labour practices) at our Jandakot site and closed out non conformance actions for Jandakot and the FY24 Bendigo audit

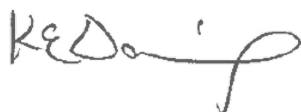
### Due diligence in our supply chain

- Developed a Supplier Code of Conduct
- Distributed 127 SAQs
- Commenced reviewing Supplier SAQ findings in to identify and understand systemic trends and issues

Further actions are set out in Section 4 of this Statement.

Going forward, we will continue to make targeted progress in policies and processes to address modern slavery risk in our operations and supply chain.

This will include refreshing our Modern Slavery Action Plan.



Kim Dorling, CFO

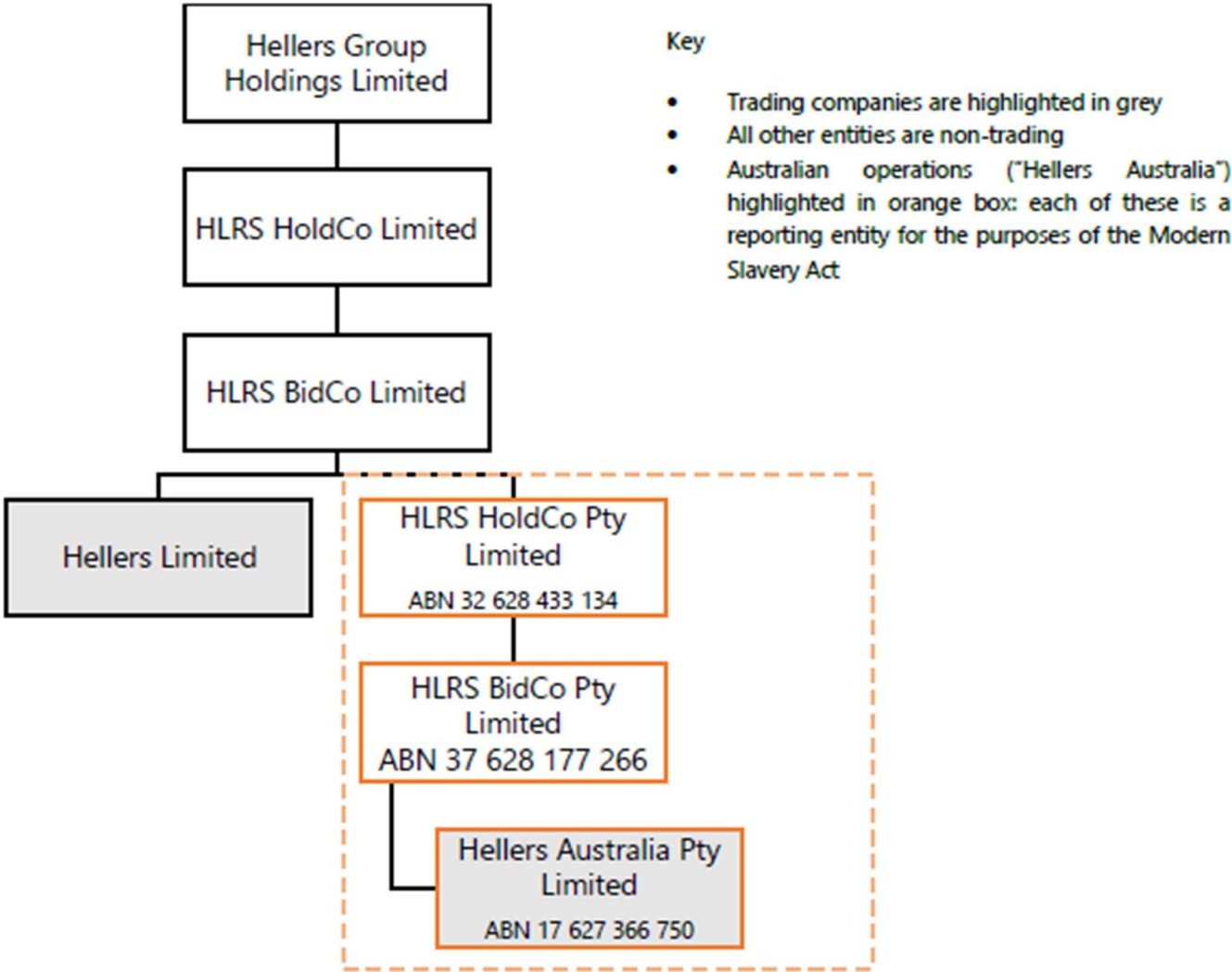
Section 2: About Hellers

Structure of Hellers Group

Hellers Limited (Hellers NZ) and Hellers Australia Pty Limited (Hellers Australia) are the trading entities of the Hellers Group Holdings Limited (Hellers Group). Hellers Limited operates in New Zealand, and Hellers Australia operates in Australia. Hellers Group is headquartered in Christchurch, New Zealand.

For the purpose of this Statement, where our structure, operations and supply chain have remained the same since the last reporting period, we have re-stated the same information in this Statement as in our previous statement.

Our business structure is set out below. **Figure 1: Structure**



## Own operations

Hellers NZ is New Zealand's leading smallgoods manufacturer producing a range of bacon, ham and smallgoods products sold to retail, foodservice, industrial, Quick Service Restaurant, and export customers. Hellers NZ has two manufacturing sites – Kaiapoi, Christchurch and Wiri, Auckland. Hellers NZ purchases meat and ingredients from local and international suppliers. In FY2025, Hellers NZ purchased NZD \$138m of meat and ingredients from 76 suppliers. We buy fit for purpose cuts of meat and process them into value added crumbed, coated, frozen, chilled and ready to eat products across ANZ. We do not undertake processing of whole birds or animals and do not cut meat into portions. We do, in our operational activity, mince, grind, chop, marinade, crumb, coat, process and cook meat.

Hellers Australia produces a range of further processed and ready to eat products from chicken and other meat products, sold to retail, foodservice and industrial customers. Hellers Australia has two manufacturing sites – Bendigo, Victoria and Jandakot, Perth. In FY2025, Hellers Australia purchased AUD \$69m of meat and ingredients from 73 local suppliers who may import components of the ingredients.

In FY2025, Hellers Group employed over 960 people across New Zealand and Australia, including direct hire permanent and casuals, and indirect hire temporary agency staff.

The table below sets out key features of our operations:

Direct employment of workers	<ul style="list-style-type: none"> <li>Hellers Group employs over 630 people in New Zealand and more than 330 in Australia, including direct hire permanent and casuals, and temporary agency staff.</li> <li>Temporary agency staff are used on an ad-hoc basis as required and are typically 0-20 in New Zealand, 5-10 in Bendigo and 0-5 in Jandakot</li> <li>In FY2025, we increased our directly engaged staff in Jandakot from 94% to 99%. In Bendigo we increased our directly engaged staff from a low of 67% to 81% as we transition away from the use of labour hire staff at all our facilities (refer to <i>Managing modern slavery risks in labour hire</i>, Section 4).</li> </ul>
The provision and delivery of products or services	<ul style="list-style-type: none"> <li>Hellers NZ manufactures and distributes bacon, ham and smallgoods in NZ.</li> <li>Hellers Australia manufactures and distributes ready to heat and ready to eat poultry and other meat products.</li> <li>Hellers Group currently has four manufacturing sites across Christchurch and Auckland, New Zealand; Jandakot, Western Australia; and Bendigo, Victoria, Australia.</li> <li>There are office-based staff working from Kaiapoi (Christchurch), Wiri (Auckland), Parnell (Auckland), and from the Bendigo and Jandakot sites.</li> </ul>
Financial Investments	<ul style="list-style-type: none"> <li>Hellers Group is structured as listed above and holds no external investments outside of the Hellers network.</li> <li>Hellers Group's largest investor is Adamantem Capital.</li> </ul>

## Supply Chain

The table below sets out key features of our supply chain.

Products provided by suppliers	<ul style="list-style-type: none"> <li>Products purchased by Hellers Group include but is not limited to: meat products (e.g. pork, poultry, beef, fish) non-meat ingredients (e.g. blends, starches, coatings, salt, oil, casings), packaging (e.g., labels, cartons, trays, film), and capital machinery (e.g. manufacturing equipment).</li> <li>Hellers Group's most significant supplier spend (in NZD) is within Australia (\$81m) and New Zealand (\$67m), with the purchase some imported goods from Asia, Europe, and North America (\$64m combined).</li> </ul>
Services provided by suppliers	<ul style="list-style-type: none"> <li>Includes freight and logistics, warehousing, professional services, cleaning services, software, waste disposal, insurance, marketing, maintenance (pest control), labour services (including temporary workers for factory and warehouse), laboratory services and utilities.</li> </ul>

The table below sets out or main procurement categories, and the locations of suppliers and key sub-suppliers for both Hellers Australia and Hellers New Zealand.

Procurement	Supplier Location	
	Hellers Australia	Heller New Zealand
Meat	Locally supplied chicken, turkey and beef.	Combination of imported and local pork, beef and lamb and local chicken, and venison.  Imported pork is sourced from Australia, Poland, Denmark, Spain, Germany, Canada, Sweden, Ireland, Netherlands and the US. Imported beef and lamb are sourced from Australia
Ingredients	All ingredients are purchased locally and are made from both local and imported ingredients.  Imported ingredients are sourced from Thailand and China.	Ingredients are sourced both locally and direct from Asia and Europe
Packaging	Sourced locally in Australia and from Asian Hazard Analysis and Critical Control Point System (HACCP)/ISO 22000 accredited suppliers.	Sourced locally and from Australia, Asia and Europe from HACCP accredited suppliers.

# Section 3: Identified modern slavery risks

## How we understand and assess modern slavery risk

Our approach to modern slavery risk is guided by the [Official Modern Slavery Act Guidance](#) and the [UN Guiding Principles on Business and Human Rights](#) (UNGPs). We are guided by the Act’s definition of “modern slavery risks” as “risk to people”, rather than a focus of “risk to business” or enterprise risk. This refers to the risk that people are being severely exploited in our business activities or relationships, including companies we are linked to by our supply chain.

We recognise that we may **cause, contribute, or be linked** to modern slavery risk as a result of our business activities and relationships. This is drawn from the UNGP’s Continuum of Involvement, which is a framework that organisations can use to assess and understand their proximity or degree of responsibility to an actual or anticipated harm. It also allows us to respond appropriately.

	Definition	Hypothetical example	What businesses should do
<b>Cause</b>	Where a business enterprise’s actions directly cause or may cause an adverse human rights impact, e.g., forced overtime or harassment at one of their facilities.	A company may purchase machinery and packaging in large quantities, the raw materials of which are extracted under conditions of slavery.	The business should take appropriate measures to cease, prevent, and remedy the cause of the impact.
<b>Contribute</b>	Where a business enterprise’s actions are one of several factors which contribute or facilitate an adverse human rights impact, e.g., systematically late payments or rush orders to suppliers which influence the supplier to withhold pay or force excessive overtime.	Due to a company’s procurement practices and delayed payments, suppliers begin withholding their workers’ wages.	Businesses should take measures to cease, prevent, and remedy, and exercise leverage to mitigate remaining impacts.
<b>Linked</b>	A business enterprise’s activities or relationships are linked to, but have not caused or contributed to, an adverse human rights impact, e.g., impacts in lower tiers of the supply chain of equipment used by the business.	A worker experiences experiencing excessive overtime and harassment at one of a company’s own facilities.	Businesses should monitor and review the impact, support remediation, and work with supply chain partners to identify causes and solutions to

To identify potential risks of modern slavery, Hellers conducts regular assessment and review of our operations and supply chains to identify actual and potential risks of modern slavery. Building on a preliminary risk assessment in 2021, in 2023 we engaged external expert human rights advisors to conduct a modern slavery risk scan covering our operations and supply chain. This risk scan found that

there were no significant changes to our supplier base and risk profile and recommended that Hellers continue to focus on the modern slavery risks previously identified in the 2021 assessment.

In the financial years 2024 and 2025, Hellers' operations, activities, and supplier relationships have remained materially the same. As such, we consider that the risks identified in 2021 and 2023 remain relevant, and we have continued to prioritise those areas of our operations and supply chain for further mitigating actions.

The risk assessment activities undertaken in 2021 and 2023 provided insight into risks of modern slavery in both our operations and supply chain. The analysis identified industries with documented inherent risks of modern slavery, based on extensive external research reports and indices including the [Global Slavery Index](#), [US State Department Trafficking in Persons Reports](#), and the [List of Goods produced by Child Labor](#). This considered the following factors:

- **Inherent risk**, which refers to the level of risk associated with a product or service, sector, or country. Inherent risk information provides insight into potential risks, but does not indicate with certainty that incidences of modern slavery have been identified in a given supply chain
- **Country risk**, an inherent risk factor which refers to the potential for human rights abuses to occur in a country; and
- **Sector risk** which similarly refers to potential for human rights abuses to occur in a particular sector or industry.
- The presence of **vulnerable workers** in the sector in which we operate or from which we source

### Figure 2: Industry risk snapshot

Modern slavery refers to extreme forms of labour exploitation. It describes situations where coercion, threats, or deception are used to exploit victims and undermine or deprive them of their freedom. Forced labour in particular is a significant problem in the Asia-Pacific area. It refers to work or service that any person is compelled to perform under the threat of any penalty and for which they have not offered themselves voluntarily. Modern slavery often goes unrecognised and unreported throughout global supply chains.

Hellers Group operates in an industry (agriculture, and specifically the meat industry) that has been found by reputable sources to have a high risk of modern slavery. These industries, including in Australia, can rely on temporary and migrant workers who are vulnerable to exploitation including unfair recruitment and labour practices. Agriculture and meat industry workers are documented as vulnerable to, among others, trafficking, debt bondage and deceptive recruitment. Some workers experience harmful or exploitative working and living conditions, intimidation, and wage theft. Additionally, the Agriculture and meat industries are reliant on migrant labour, including through programs such as the Pacific Australia Labour Mobility (PALM) scheme. Workers are vulnerable to exploitation through rogue operators participating in these programs and systemic factors that increase their vulnerability.

### Identified modern slavery risks and potential level of involvement

We have identified six significant high-risk industries across our operations and supply chains. In the table below, we set out the risk area (industry), relevant risk considerations and a brief assessment of our potential level of involvement (per the UNGPs' Continuum of Involvement, as described above).



These areas are the focus of our program of work. Our operations and supply chain risks are described in further detail later in this section.

Modern slavery and the meat sector Identified risk areas	Our potential level of involvement	Risk factors
<b>Meat processing</b>  <b>Cleaning services</b>  <b>Contracting and labour hire</b>	Cause or contribute  e.g., Hellers may inadvertently contribute to modern slavery risk for workers providing labour and services such as cleaning through hiring or payment practices. Hellers may potentially cause modern slavery if direct employees are affected.	<ul style="list-style-type: none"> <li>• Prevalence of migrant workers, a vulnerable group</li> <li>• Insecure work, day labourers, casuals, and subcontractors – indicating potential for less worker visibility and increased risk of worker exploitation and forced labour</li> <li>• Workers engaged via PALM Scheme visa programs, creating heightened vulnerability to exploitation</li> <li>• Health and safety concerns present, including poor or dangerous working conditions</li> <li>• Materials risk – manufacturing industry and geographies where manufacturing may be located has a higher risk of forced labour practices</li> </ul>
<b>Construction, repairs and maintenance</b>	Contribute or linked  e.g., Hellers may contribute to labour exploitation through engagement of third-party agencies for maintenance and repairs at our manufacturing sites.	
<b>Freight and logistics</b>	Linked e.g., Hellers may be linked to risks of modern slavery for workers providing logistic services such	<ul style="list-style-type: none"> <li>• Logistics and shipping industry are a noted area of modern slavery risk – due to presence of vulnerable workers, isolation, and inadequate health and safety standards</li> </ul>
<b>Packaging and equipment</b>	Linked e.g., Hellers may be linked to labour exploitation in the supply chain of packaging and equipment.	<ul style="list-style-type: none"> <li>• Manufacturing is a high-risk industry for modern slavery, and international manufacturing hubs have higher prevalence of forced labour practices</li> </ul>

## Modern slavery risks in our operations

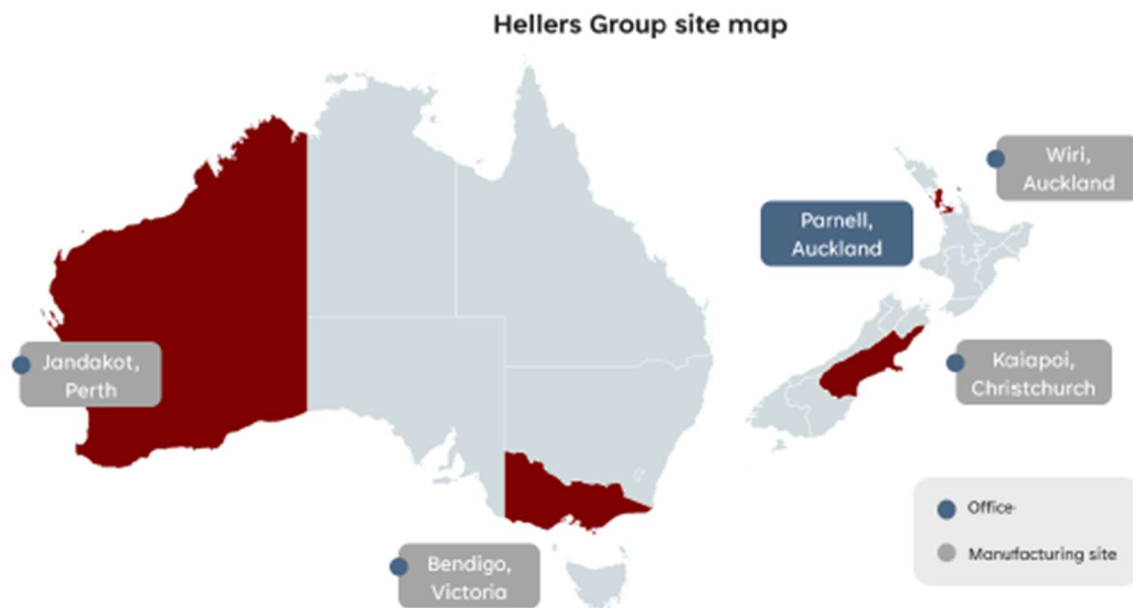
### ***Direct business operations and sector risk***

Our direct operations and business activities and relationships are in several high-risk industries for modern slavery, including agriculture, meat processing, property management services (e.g. cleaning and maintenance), and logistics and shipping. See the boxed text regarding risks in the meat sector. We also engage workers through labour hire, particularly in our meat preparation and processing activity. As noted earlier in this statement, our activity consists of preparation of purchased cuts of meat, which we turn into products. We do not process or portion whole birds or animals.

### Geographic locations

Hellers' operations are in New Zealand and Australia. Global research into the prevalence of modern slavery around the world indicates that both New Zealand and Australia have a low inherent risk of modern slavery. The most recent estimates from the Global Slavery Index show that 1.6 people per thousand are living in conditions of modern slavery (both forced labour and forced marriage) in both countries.

**Figure 3: Site map**



- In **New Zealand**, forced labour exploitation has been reported in labour intensive industries such as agriculture, dairy, horticulture, and domestic service industries. Our business relies on these industries, especially agriculture.
- In **Australia**, forced labour has been noted to occur in agriculture, domestic work, meat processing, and food services. Agriculture and meat processing are critical auxiliary sectors for our business activities. We also employ third party cleaning services.
- While Australia and New Zealand are lower risk for modern slavery, people do still live in conditions of modern slavery in both countries. In addition, as noted our business activities and relationships are in industries with higher inherent risks of labour exploitation in the Australian and New Zealand contexts, including agriculture and manufacturing. This is primarily due to the presence of migrant labour, complex subcontracting arrangements, involvement of international recruitment agencies, as well as potential risks of isolation and physically demanding work.

## Workforce

As described in Section 1, we directly employ 960 workers in Australia and New Zealand. Approximately 900 of these workers are employed at our manufacturing sites (this includes office-based staff located at the factory sites and only excludes our field sales team, merchandisers and remote workers). In the meat processing and agricultural industries in Australia and New Zealand, there are worker groups that may be vulnerable to exploitation, such as migrant workers.

## Labour hire

Hellers engages workers through labour hire agencies and subcontractors, and in the reporting period we engaged up to 50 temporary staff across our 4 manufacturing sites during times of high-volume seasonal work. Labour hire remains one of our most significant modern slavery risks. In Australia, this sector is insufficiently regulated, and the workforce is typically migrant, season, or base-skill workers who are vulnerable to exploitation by labour hire agencies. Exploitation that has been found includes deceptive recruitment, high recruitment fees, debt bondage, excessive or unpaid overtime, underpayment or withholding of wages, and hazardous living conditions. We have formal contracts with our labour hire suppliers to ensure staff are treated in accordance with laws.

Our Bendigo labour hire agency is licensed in Victoria where there is labour hire licensing.

In the reporting period, Hellers made significant progress in preventing and managing risks associated with labour hire. Refer to *Managing modern slavery risks in labour hire*, Section 4. The labour composition graph sets out our use of direct and indirect employees in FY2025.

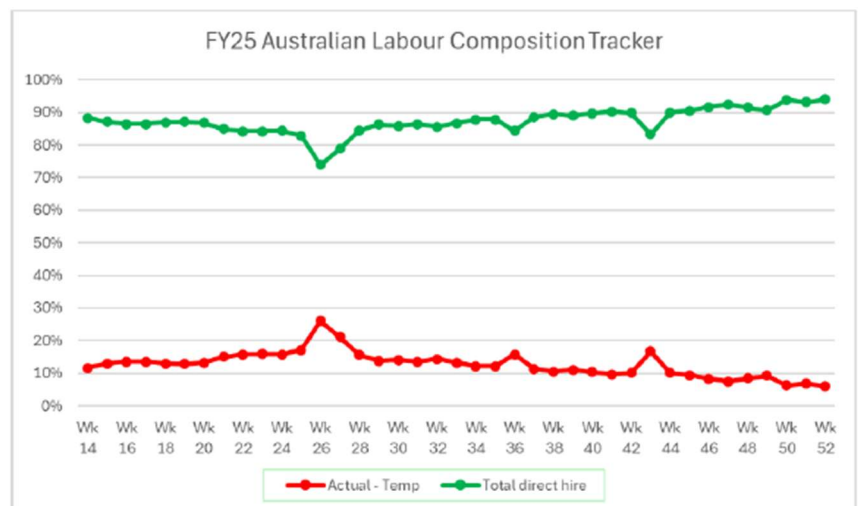


Figure 4: Labour composition

## Modern slavery risks in our supply chain

### Geographic risk

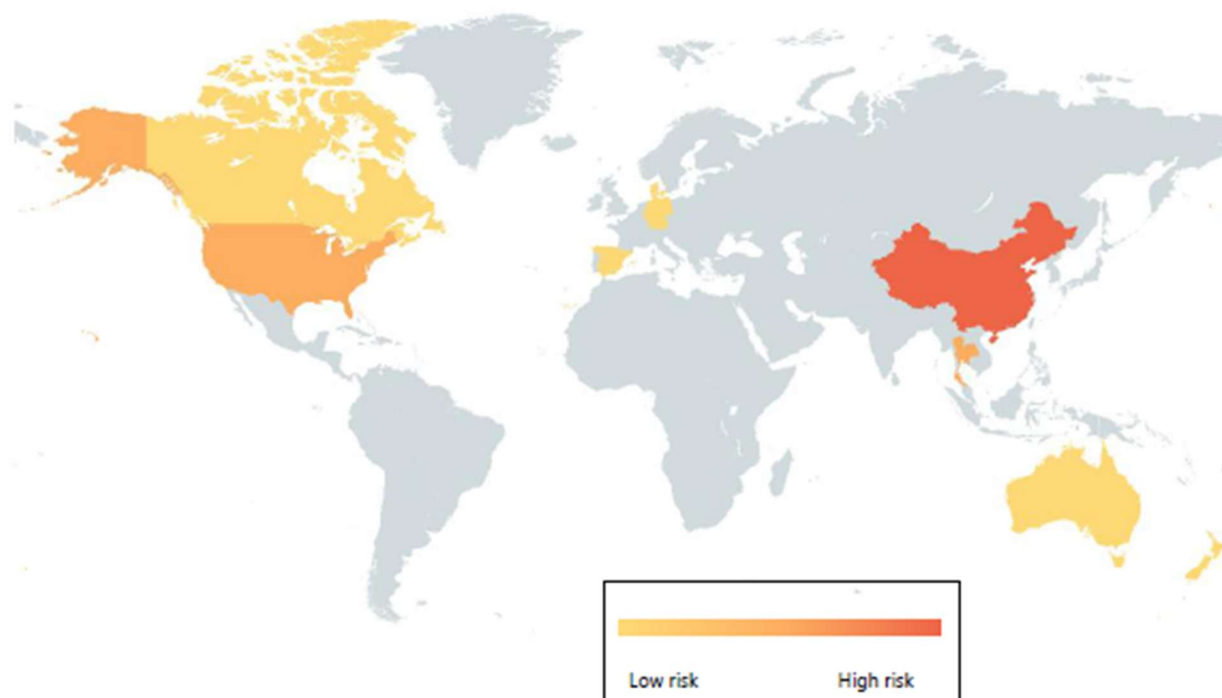
As described in Section 2, most of our procurement is with Australian and New Zealand suppliers, but we also purchase from suppliers in Asia, Europe, and North America. We recognise that our Australian and New Zealand suppliers may be distributors for goods produced in other countries, and/or have modern slavery risks in their supply chains.

Hellers purchases meat, ingredients, and packaging from local Australian and New Zealand suppliers as well as suppliers in Thailand, China, Poland, Denmark, Spain, Germany, Canada and the US. Agriculture, meat processing, and manufacturing are high-risk industries for modern slavery:

- There is a very high prevalence of forced labour in the manufacturing sector in the **Asia-Pacific region**. This has been found in both food and packaging manufacturing.
- Agriculture and meat processing have high proportions of migrant workers, and in countries with lower overall modern slavery risk such as **Poland, Denmark, and Spain**, these industries have documented cases of modern slavery.

Figure 5, below, shows the inherent geographic risk of countries some of our key suppliers are based in, and the risk of modern slavery in the specific industries we procure from.

**Figure 5, Geographic risk in supply chain countries of origin.**



### **High-risk goods and services**

As described in *Section 2*, we identified six high-risk procurement categories:

- Meat processing and ingredients;
- Packaging and equipment;
- Cleaning services;
- Contracting and labour hire;
- Construction, repairs, and maintenance; and
- Freight and logistics.

The global manufacturing industry, which produces packaging and equipment and meat processing and ingredients, has a high incidence of modern slavery and other labour exploitation practices such as deceptive recruitment, debt bondage, and in some countries child labour.

The services we procure, including cleaning; construction, repairs, and maintenance; freight and logistics; and contracting and labour hire have a high risk of modern slavery due to factors such as a high proportion of migrant and vulnerable workers, and multiple layers of subcontracting which reduce transparency and accountability.

## Section 4: Hellers' actions to assess and address modern slavery

### Summary of key actions

Hellers continues to progress against our Modern Slavery Action Plan. In the reporting period, we have:

- Added a specific modern slavery clause to cleaning contracts for our Jandakot site
- Developed and implemented a Supplier Code of Conduct which includes consideration of forced labour and modern slavery practices. It is published on our website, communicated to suppliers, and included in supplier onboarding processes
- Continued our journey in Australia to transition from labour hire to directly employed workers, preventing and managing risks associated with labour hire, significantly reducing our reliance on labour hire in Australia.
- Commenced standardising our procurement practices across different functions in Australia and New Zealand. An ANZ Supply Chain Leader was appointed with responsibility for sourcing across the business, and our tender processes across ANZ were made more consistent and included increased due diligence
- Improved our Quality Assurance through supplier acceptance criteria
- Commenced reviewing Supplier SAQ findings to identify and understand systemic trends and issues
- Added modern slavery into our corporate risk register and defined risks and controls
- Registered our New Zealand sites for SEDEX, conducted a *SMETA* audit of our Jandakot site and closed out non-conformance actions for Jandakot and the FY24 Bendigo audit.
- Integrated modern slavery as a compulsory part of annual ESG updates to the Senior Leadership Team as a KPI
- Conducted a full review and standardisation of all policies across the business

### Governance and risk management

Hellers is committed to assessing, addressing and preventing modern slavery risks in our operations and supply chains, and this commitment is reflected throughout our corporate governance structures.

- **Responsibility and oversight:** Our Chief Financial Officer has responsibility and oversight of our overall modern slavery approach.
- **Modern Slavery Board Sub-committee:** this Sub-committee meets annually to review Hellers' Modern Slavery Statement and agree on actions for the following year.
- **Board and Leadership updates:** Modern slavery is included as part of our regular business and ESG updates provided to the Board, Senior Leadership Team, and management across the

business. The Senior Leadership Team and Board discuss modern slavery risks, our actions to assess and address these risks, and updates on actions and initiatives taken during the year.

- **Capability and awareness:** Relevant leaders, including our Purchasing, Quality, and ESG Managers, and Executive teams have a strong working awareness and knowledge of Hellers' obligations to identify, address, manage, prevent, and report on modern slavery risks and impacts.

## Policies

In FY2025, all of our internal policies were reviewed by functional managers and our CEO as part of our annual policy review. A focus of this year's review was consolidation of differing policies in Australia and New Zealand, and moving forward, policies will be created for Australia and New Zealand as a whole and will be published on our intranet. We have several internal policies that support our approach to identifying and addressing modern slavery risks in our **operations**.

These policies include:

<b>Code of Conduct</b>	Our Code of Conduct outlines the expected values and behaviours of our business and employees.
<b>Modern Slavery Policy</b>	Our Modern Slavery Policy supports our commitment to contributing to ending all forms of modern slavery. This policy outlines our approach to reducing the risk of modern slavery practices within our operations and supply chain.
<b>Whistleblower Policy</b>	This policy outlines our whistleblower process and the protections provided to Whistleblowers should they raise a concern.
<b>Diversity, Inclusion and Equal Employment Opportunity Policy</b>	We are committed to an inclusive workplace that embraces and promotes diversity and inclusion. Equal employment opportunity is a fundamental principle of Hellers Group. Employment and progression is based on personal capabilities, experience, and qualifications without discrimination on the basis of every protected characteristic at law.
<b>Corporate Social Responsibility Policy</b>	This policy outlines our commitment to acting responsibly and ethically in all aspects of our business operations, including people and the environment.
<b>Supplier Code of Conduct (new in 2025)</b>	Developed and implemented in FY2025, our Supplier Code of Conduct applies all suppliers, their employees, representatives, and subcontractors. It sets out our expectations of lawful and ethical conduct, including adherence to the internationally recognised frameworks and standards for labour rights and decent work and is published on our websites.

## Due diligence and risk management actions for workers at our sites

### *Employee standards*

Our employee management and document check procedures have not changed significantly since our last statement.

- Hellers ensures all directly employed workers are provided with a written contract in English with clear terms of employment including wage rates and hours of work.
- We undertake different degrees of document checks of workers throughout the business, including proof of age and legal rights to work. We undertake these checks to confirm workers are allowed to work according to legal standards and applicable organisational policies.
- In the reporting period, we transitioned away from relying on labour hire at our Jandakot and Bendigo sites in Australia. See below.

### *Site audit*

In FY2025 Hellers registered all 4 manufacturing sites with SEDEX (Supplier Ethical Data Exchange) and completed the supplier SAQ. At this stage only our sites at Bendigo and Jandakot are audited by SMETA every two years as part of our commitment to SEDEX.

- **Bendigo:** In FY2024, a SMETA audit was conducted at our Bendigo site. Hellers had taken the recommended corrective actions identified in earlier audits and as a result all non-compliances were closed. This includes actions in relation to ensuring working hours are not excessive, establishing young labour protections, and having in place effective systems to keep up with legislative requirements.
- **Jandakot:** In January 2025, our first SMETA audit was conducted at our Jandakot site. The Bendigo team shared learnings from their experience with our Jandakot team to help prepare the Jandakot site for the audit. Jandakot passed the audit, and all non-conformances have been closed out.

## Additional controls for labour hire

Hellers has taken several steps to improve management of the risks associated with labour hire providers.

- **Reducing reliance:** Our primary strategy has been to reduce our reliance on labour hire workers, by transitioning away from the use of temporary agency workers in our sites across New Zealand and Australia. Instead of indirectly engaging workers during high-volume periods, we have sought to engage workers across our operations through direct casual employment with us. Direct employment is preferred at all our sites, and in May 2025, we employed a human resources advisor at our Bendigo site to support direct recruitment of workers.
- **Strengthening oversight:** Where we continue to engage workers through labour hire, we have taken steps to strengthen oversight and management of their working conditions at our sites.

- In Australia, we require labour hire providers to demonstrate **transparent wage payments** and deduction disclosures, appropriate wages according to the applicable award rates, and we review modern slavery and related policies as part of pre-contract screening.
- **Tracking worker types:** In the reporting period, as noted in the section on risks, we implemented a new process to track the number of permanent, casual, and temporary staff across the business to ensure we have an accurate understanding of our labour hire use. This is tied to site-specific targets to reduce the number of temporary workers.

## Due diligence and risk management for our suppliers

### ***Supplier Code of Conduct***

In FY2025, we developed a **Supplier Code of Conduct** which covers principles of good corporate governance, environmental protection, and decent work. Labour rights, child labour, freedom of association, and appropriate working hours and wages are in the scope of decent work provisions, and modern slavery of any kind is not tolerated.

The Supplier Code of Conduct was published on our website, provided directly to all existing suppliers, and will be provided to all new suppliers as part of our onboarding process.

### ***Supplier SAQ***

In FY2024, we updated our supplier self-assessment questionnaire (SAQ) to improve our understanding of our suppliers' modern slavery risks and management controls, ESG measures, and animal welfare policies (where applicable).

- The SAQ was first issued in FY2024 to existing high-risk suppliers and incorporated into our supplier onboarding processes.
- In FY2024, "red flag" indicators in SAQ responses were defined to enable us to identify poor labour practices and heightened risks of modern slavery practices or conditions that may lead to adverse human rights impacts within our supply chain. No escalations were triggered in FY2025
- In FY2025, we continued rolling out the SAQ, and as of 30 June 2025, 115 suppliers have completed and returned it to us. The suppliers were primarily from meat, ingredients, packaging, logistics and service providers.

### ***Escalation Committee***

We established an internal Escalation Committee, made up of leaders from our Quality, Procurement, Finance, and ESG teams. The Escalation Committee reviews SAQ responses that trigger a "red flag" or exceptional circumstance. In FY2025, no SAQ responses warranted an escalation and therefore the committee did not meet.



## Modern slavery training and awareness

Our Procurement and Quality teams received specific modern slavery training in FY2024 to upskill them in understanding modern slavery, how it presents in our industry, how to identify it in our supply chain, and how Hellers addresses risks through our SAQ process. In FY2024, we also undertook a campaign to raise awareness throughout the entire business about modern slavery risks and how to report.

In FY2025, we built on this by providing ESG updates to senior leaders, which were then communicated to managers and teams throughout the business. These updates include modern slavery and Hellers' progress and actions.

Modern slavery was added to our corporate risk register in the reporting period. Modern slavery was discussed throughout the business, and risk and controls were defined. The SMETA audit approach also improved capability by collating and preparing information in response to the SAQ.

## Grievance mechanisms and remedy

We are committed to investigating whistleblower reports and protecting reporters and suspected reporters from reprisal and victimisation. Outside of our external whistleblower service provided (described below), we have internal processes employees can follow to raise concerns. In FY2025, no modern slavery concerns were raised through the whistleblower or Stopline.

### ***Whistleblower Policy***

Our Whistleblower Policy outlines who can make a report and what can be reported, as well as who can receive a whistleblower disclosure. The Whistleblower Policy covers "illegal and unethical conduct" which includes concerns related to modern slavery and labour exploitation.

- Eligible reporters include: current and former employees, including apprentices and trainees; anyone working for Hellers Group under contract including contractors, subcontractors, labour hire companies, and their employees; and any organisation and its employees who have a business relationship or are otherwise associated with Hellers Group.
- People can make whistleblower disclosures to our CFO in person, via email or phone, or through our dedicated external service provider Stopline.

### ***Stopline***

Stopline provides expert forensic investigator support in taking calls and analysing disclosures. When Stopline receives a report, they provide timely reporting of incidents to dedicated representatives within Hellers. We will continue to raise awareness of our platform and process with workers and suppliers, so they know when and how to raise concerns.

- Workers can access Stopline confidentially and at any time through several channels, including a free-call number for New Zealand and Australia, a dedicated email account, and an online portal.

- Stopline also provides updates on the status of the report and any decisions made around it. Reporters can confidentially access these updates through the platform even if they decide to remain anonymous.

### ***Our commitment to remedy***

We recognise our responsibility to respect human rights and prevent, mitigate and remedy impacts that we may cause, contribute or be linked to. We are committed to working with suppliers to mitigate risks of modern slavery and address issues as they arise. In the event of non-conformance, we will work with the suppliers to remedy the harm caused to people and improve their processes. We would cease a relationship over egregious practices and willful non-compliance.

### **Our Modern Slavery Action Plan: Update and Future Commitments**

Hellers has continued to progress against our Modern Slavery Action Plan and made new commitments for the future to continue improving our approach to modern slavery risk assessment, prevention, and management. Progress against our Action Plan in FY2025 is set out in the following table:

Action	Progress
Address SMETA Corrective Action Plans at our Australia sites: Bendigo, Jandakot	Complete
Implementing new modern slavery clauses in our cleaning contracts	Complete
Roll out SAQ to all suppliers and embed as an onboarding process	Ongoing
Develop and implement a Supplier Code of Conduct	Complete
Embed responsible sourcing escalation process internally	Ongoing
Reduce reliance on labour hire workforce by transitioning to using directly employed workers in our Jandakot warehouse site	Complete
Conduct two yearly SMETA audits at our Australia sites	Ongoing
Assess Hellers' relationship to potential impacts using the UNGP Continuum of Involvement	In progress
Understand the procurement practices across different areas of business (Australia and New Zealand) for standardisation of practice across Hellers.	Complete
Review SAQ findings in a category, gather learnings and apply across other categories	
Receive and evaluate SAQ findings, and assign roles of Evaluation team for review of SAQ and Relationship Manager for escalation	Ongoing
Establish annual Senior Leadership team discussions on modern slavery and what we are doing as a business to improve and enhance practices	Complete

We have identified the following future actions to prioritise for FY2026-27.

- Improve internal awareness of modern slavery risks
- Develop improved KPIs for modern slavery reporting and review the effectiveness of our approach: Conduct internal workshop to define KPIs, data needs, components and steps
- Continue to roll out site based modern slavery due diligence measures including audits
- Review modern slavery related incident management and remediation processes
- Capacity-building program with high-risk, high-spend suppliers to target for capacity building including review of agreed KPIs (as part of broader ANZ initiative to embed supplier partnerships with agreed metrics and deliverables)
- Consider opportunities to broader industry engagement and learning on topics relevant to modern slavery

**Section 5: Reviewing the effectiveness of our actions**

As set out in the previous section, we hold ourselves to account for the implementation of our action plan and the development of new objectives and metrics. We also sought external advisory support in the preparation of this statement which included gathering insights into areas for improvement across our approach to modern slavery. As we improve our processes to identify and address modern slavery, we assess the effectiveness of our actions taken through the following measures:

Effectiveness measure	Results in FY2025
# of whistleblower reports (general)	0 received
# of suppliers issued SAQs	127
# of SAQ responses received	115
SMETA audits completed	1

In addition to quantitative metrics, we recognise the importance of learning and reflection in order to improve our approach to modern slavery. In FY2025 we have continued to implement our SAQ process to more proactively identify and manage risks and understand our risk profile. The implementation of our Supplier Code of Conduct is also a key action which forms part of our proactive risk management approach. We will continue with strengthening these approaches in the coming reporting period as a key element of continuous improvement.

**Section 6: Consultation & approval**

Our Modern Slavery Action Plan was developed with consultation from across the Hellers Group business including subject matter experts from Human Resources, Procurement, Finance and Operations. During the reporting period, we actively engaged and consulted with all companies we own or control in the development of this Statement, including those that are reporting entities for the purposes of the Act (owned and controlled entities are outlined above). We discussed details of the Act’s reporting requirements and the actions we intend to take to address these requirements and provided stakeholders with relevant materials and updates.

Our FY2025 Modern Slavery Statement was drafted externally with support from the business and the CFO. The Statement is reviewed in detail by the Modern Slavery Board sub-committee, with the final Statement approved by the Board.

This Statement was approved by the Board of Hellers Group Holdings in their capacity as principal governing body of Hellers Group Holdings Limited on 20 November 2025.

***Signature of responsible member***

A handwritten signature in blue ink, consisting of a stylized 'A' followed by a horizontal line and a large loop.

This Statement is signed by Angus Stuart as a responsible member of the Board of Hellers Group Holdings Limited, in their role as Director, as defined by the Modern Slavery Act 2018.