



Modern Slavery Statement

2022



Staughton Group: Our Commitment

This Joint Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 for the reporting period of 01 January 2022 to 31 December 2022.

Tintinallogy (Operating Holding Co) Pty Ltd, active from December 2021, is the holding company for each of the entities listed in Appendix A (Entities / Structure). Staughton Group reporting entity controls and manages these entities, all these entities are collectively known as Staughton Group.

Staughton Group values and supports the ideals of the Modern Slavery legislation, and the spirit of the law. The wellbeing of our team, and those of our strategic supply partners is important to us.

Staughton Group is committed to;

- Identify, understand, and manage our risks by ensuring all strategic supply partners are assessed against these ideals.
- Ensure to the best of our ability that our strategic partners are not associated with modern slavery practices by means of their value offering.
- Develop and promote Staughton Group governance through documented framework, training, and auditing.
- Adopt a continuous improvement approach to these commitments.

In accordance with the Act, this Modern Slavery Statement is signed and authorised by the entity's principal governing body. The undersigned is a responsible member of Tintinallogy (Operating Holding Co) Pty Ltd and associated entities and represents the principal governing body. Consultation occurred with the senior leadership management team of the entities in the preparation of this statement.

Signed by

Edward Staughton
Managing Director
Staughton Group Pty Ltd
June 2023



our values

 **PRIDE**

We love what we do

 **TENACITY**

Never give up, like a dog with a bone

 **INNOVATION**

We creatively solve problems

 **INTEGRITY**

We are honest and deliver on our promises

 **COLLABORATION**

Together we can be the best

Staughton Group: Introduction

Staughton Group specialises in high-quality food manufacturing, primarily in the pet food markets, and game meat products through the Wild Game Resources entity. Staughton Group is a fast growing, innovative regional organisation located on the beautiful Murray River, a dynamic Australian business leading the manufacturing industry.

Comprised of three key entities, and leveraging key strategic partnerships, Staughton Group provides a complete end-to-end manufacturing and logistics solution to businesses in the food ingredient and retail sectors. With experience in food ingredient processing, co-manufacturing, technology development, logistics and engineering, Staughton Group is the definitive partner for all food ingredient manufacturing requirements.

Staughton Group was shaped when one of Australia's first farming families became partners in an offal processing facility. Over 30 years, the group has grown from a meagre co-product processing plant to producing the highest quality Australian food ingredients on a large scale, now employing over 300 employees across all entities.

Through its member entities, Staughton Group strives to maintain its place as the go-to for local and multi-national businesses looking for a partner in food manufacturing.

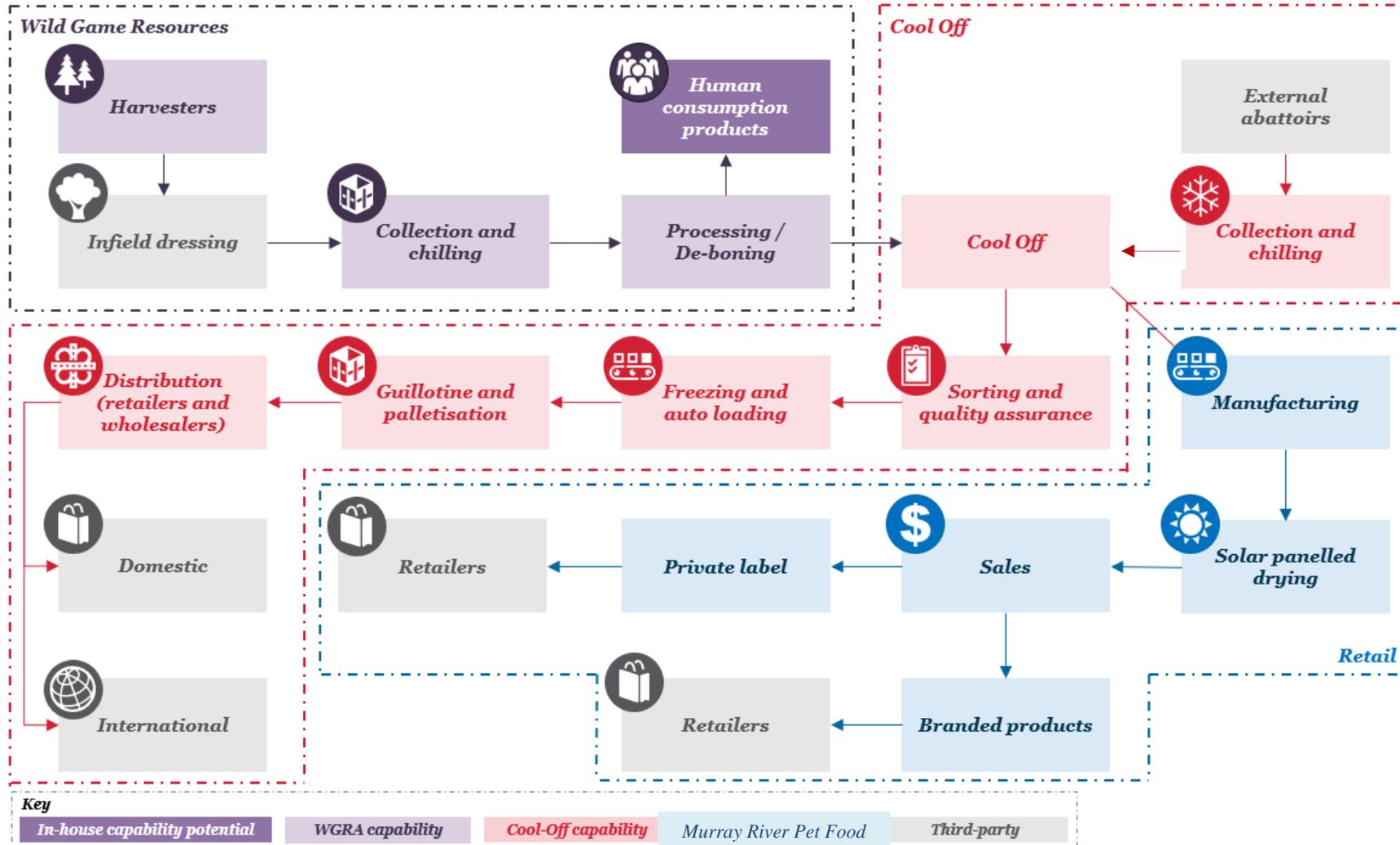


Brands



Staughton Group: Operations

Staughton Group benefits from an established and integrated end-to-end supply chain, utilising best in class technology to provide security of supply for ingredient and branded retail products.



Staughton Group: Operations



Cool Off Pty Ltd

Cool Off Pty Ltd is Australia's premier producer of pet food raw meat ingredients for pet food manufacturers with a primarily B2B focus, it was established as a collector to aggregate and freeze natural fall offal from Australian abattoirs. Cool Off has subsequently expanded operations to include premium meat powder production and mechanically deboned meat. Using the best technology and engineering, Cool Off can deliver the freshest raw meat products to pet food suppliers globally.



Wild Game Resources Australia

Wild Game Resources Australia (WGRA) was established in 1952 and was a pioneering force in the establishment of the game harvesting industry in Australia. WGRA procure and distribute Australian wild game meats including kangaroo, wild boar and venison to the domestic and export markets, growing to one of Australia's leading suppliers of game meat globally. WGRA have established strong domestic and export demand for game meat which provides an opportunity for expansion and innovation within the industry. Working closely with government bodies, export authorities and customers, we are committed to ensuring that a professional approach and high standards are maintained in the field to secure the long-term viability of the industry. Southern Game Meat entity is held by Wild Game Resources



Dried & True (Trading as Murray River Pet Food)

Using innovative air-drying technology, Murray River Pet Food manufactures dehydrated pet treats for the Australian and international markets, through both private label, co manufacturing and standalone retail branded products. With capacity to supply large quantities of premium Australian meat products, Murray River Pet Food is constantly expanding and developing new processes to ensure our products are top quality, ground-breaking and accessible to the wholesale and retail markets. Vet's All Natural entity is held by Dried & True.

Staughton Group: Supply Chains

Staughton Group engages with a wide range of strategic supply partners. This is to ensure an exemplary product customer service and product delivery. The following encompass the major procurement areas from raw material supply through to customer.

Raw Protein Co-Product Material

A significant portion of our raw protein products are manufactured from Australian human food supply co-products. This includes bovine, ovine, caprine, macropods and fish products. These co-products would otherwise be destined for waste as land fill, or through a high energy manufacturing process, to produce a meal. The up-cycling of these co-products provides our customers and the environment with a mutually valuable benefit. Game meat is collected through our accredited Australian sourced supply process.

Some ingredients may be purchased from overseas depending on Australian supply availability. Any overseas purchase is transacted through the Australian Government agency governance requirements.

Processing Supply

The processing operation engages a variety of strategic product and service providers. This includes:

- Transport and logistics
- Production inputs as ingredients and packaging
- Maintenance and engineering for plant and equipment
- Chemical and cleaning
- Team members from both direct and labour hire for processing and associated tasks
- Team members production personal requirements (e.g. PPE)

The majority of these strategic process supply providers are Australian based, however, we understand that some of these suppliers may source product from overseas.

Sales and Logistics Supply Chain

Staughton Group and its entities products can be found in many of Australia's supermarkets, pet food retailers, wholesalers, and veterinarian outlets. Our products can pass through several third party and storage (ambient and cold storage) providers. Staughton Group also exports to countries throughout America, Asia and Europe.

Service Providers

Third Party strategic suppliers also contribute to the overall business function. These include finance, marketing, co manufacturing and packing, and health providers.

Staughton Group: Risk of Modern Slavery



The Walk Free Global Slavery Index 2023 reports that Australia is a low risk with a 6.8 vulnerability to Modern Slavery index. It also states that Australia has the strongest government response to modern slavery in the Asia Pacific region, and the equal second strongest response globally. Regardless, Staughton Group will continue to be watchful in assessing all business transactions for modern slavery activity to reduce this humanitarian risk both domestically and, more importantly with international procurement and engagement.

Operations Risk

Staughton Group has two manufacturing facilities located in NSW Australia - Howlong and Walgett. Both facilities have on-site day-to-day management, and all team recruitment is through a central People and Culture resource. Staughton Group employ team members through an agency, and directly. Migrant workers at these manufacturing locations substitute labour shortages as necessary. Suppliers Approval Governance is managed through a central framework to reduce operational risk.

Sector and Industry Risk

It is recognized by Staughton Group that the pet food industry is not regulated by a government body. The industry sector is reliant on the state food authorities to ensure facility suitability for processing. Staughton Group are active members within the Pet Food Industry Association Australia (PFIAA) to ensure input and currency into industry governance.

Product and Services Risk

The pet food risks associated with the modern slavery risk are acknowledged by Staughton Group. With the sourcing of imported ingredients, and the ethical pressure of sourcing food for the human food stream.

Staughton Group, through its approved supplier program will continue to request suppliers to report on the risks of engagement in slavery activities and will adjust partnerships and commercial arrangements accordingly.

Staughton Group: Governance

Staughton Group has embraced a Global Food Initiative certification, SQF Edition 9, and the global ethical registration with SMETA (Sedex Members Ethical Trade Audit) to ensure that ethical standard is maintained and challenged throughout the organisation. Staughton Group has been members since 2019.

The SMETA four pillars audit acknowledges:

1. Labour Standards
2. Health and Safety
3. Environmental Assessment
4. Business Ethics

Staughton Group have governance policy, procedures and systems that support and mitigate the risk of slavery. They are as follows:

HR_SOP_110 Human Rights Procedure: This procedure outlines Staughton Group's approach to human rights and the standards we set for ourselves and the people with whom we work.

HR_SOP_112 Whistleblower Procedure: Ensuring that the Company has sound procedures to allow all workers and their families to identify and report genuine concerns about illegal conduct or any improper situation pertaining to the Company, without fear of reprisals.

HR_SOP_109 Code Of Conduct: The purpose of this Code is to describe the standards of behavior and conduct expected from workplace participants in their dealings with customers, suppliers, clients, team members, management and the general public.

QUAL_SOP_140 Approved Suppliers Procedure: The purpose outlines the requirements to manage suppliers and service providers for the purpose of ensuring safe and ethically sourced products for Staughton Group customers in line with Staughton Group conditions. This includes assessment of the supplier's commitment and evidence of requirements under the Modern Slavery requirements.

All these governance documents are audited and reviewed in line with both external and internal requirements. These are updated in line with, and changes to, legislative instruments.



Staughton Group: Consultation and Effectiveness



Consultation

Staughton Group Board and Executive Team is responsible for the management of all business values across all entities it controls. This provides the opportunity for engagement and feedback on the preparation of the statement for this reporting period, and improvements for future statements.

The 2022 reporting period provided the opportunity for Staughton Group to consult on internal. (e.g. Approved Supplier Assessment and Program) and a framework to best suit the Staughton Group business and entities to manage the reporting requirements throughout the period.

This will, and has, led to a greater awareness and understanding of the Staughton Group approach and actions that can be taken to manage and reduce the risk of Modern Slavery influences within the supply chain.

The Staughton Group value of Collaboration is a fundamental principle that captures the behavior to consult.

Effectiveness

During the 2021 reporting period, Staughton Group commenced the Staughton Group Modern Slavery Supplier surveys for all approved suppliers. These responses provide the ability to identify our supply chains current state and the priorities to be resourced in governance, procurement & supply chain, operations, training, grievances, and reporting.

Staughton Group will improve and apply the entity's cross functional risk matrix to establish the risk rating associated with the Modern Slavery principles, and act on these as priorities as High, Medium and Low. Reporting will then determine the effectiveness of the Staughton Group Modern Slavery Framework to the Management and Executive Teams and the entity's principal governing body.

2021 Actions Completed

Supplier Surveys

Supplier Modern Slavery surveys have been enacted to the Staughton Group approved suppliers with a 63% response rate.

Supplies Ethical Certification

Suppliers risk assessment incorporated the identification of registration with the Sedex Members Ethical Trade Audit.

Staughton Group: Validation and Improvements



Staughton Group will in the 2023 reporting period continue to strengthen the governance that supports the Modern Slavery Act 2018 requirements and the spirit of the law.

This will be evident by:

- The inclusion of a reporting escalation process and framework for modern slavery in the Supplier Code of Conduct.
- Modern Slavery survey responses will form the basis of information to prioritise through an embedded risk assessment process. This risk assessment will include:
 - Sector and Industry Risks
 - Product and Services Risks
 - Geographic Risks
 - Supply Chain Model Risks
- Training will be extended to include all new Staughton Group team members through the onboarding and induction process. Also, further training will be provided to management, procurement, and human resource personnel to ensure a greater awareness of the requirements and how Staughton Group is meeting both legal and moral obligations in relation to the Modern Slavery principles.

2021 Actions Completed

The Staughton Group Suppliers Code of Conduct was issued to all suppliers through the approved supplier framework.

The code states:

The expectation that Suppliers do not engage in the use of slavery or child labour.

Staughton Group has a zero tolerance to this activity, and it is treated as a gross human rights abuse. Staughton Group has a commitment to the requirements and spirit of the Australian Modern Slavery legislation.

Appendix A: Staughton Group Reporting Entities / Structure

Number	Staughton Group Reporting Entity	Australian Company Number
1	Tintinallogy (Operating Holding Co) PTY LTD	653 280 034
2	Cool-Off Pty Ltd	068 308 225
3	Dried and True Pty Ltd (trading as Murray River Pet Food)	142 227 398
4	Vet's All Natural Holdings Pty Ltd	113 238 252
5	Vet's All Natural Pty Ltd	095 065 302
6	Wild Game Resources Australia Pty Ltd	623 653 369
7	Southern Game Meat Pty Ltd	002 981 811
8	Wild Game Holdings Pty Ltd	623 652 344
9	Staughton Group Pty Ltd	619 746 995
