



# Craig Mostyn Group

## Modern Slavery Statement 2024-25



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## REPORTING ENTITIES

The Craig Mostyn Group is committed to limiting the risk of Modern Slavery occurring within its own business, within its supply chain or through any other business relationship.

This statement is provided by Craig Mostyn Holdings Pty Ltd (ACN 008 398 356) as a joint statement under the *Australian Modern Slavery Act 2018* [Cth] (**Modern Slavery Act**) for the financial year ending on 30 June 2024 (**FY24**). The statement relates to Craig Mostyn Holdings Pty Ltd and the following reporting entities, along with the controlled subsidiaries listed on page 3, collectively referred to as the Craig Mostyn Group:

1. Craig Mostyn Holdings Pty Ltd (ACN 008 398 356)
2. Derby Meat Processing Co Pty Ltd (ACN 008 679 016)
3. Derby Industries Pty Ltd (ACN 009 033 612)
4. Jade King Holdings Pty Ltd (ACN 611 994 917)

Craig Mostyn Group take a consolidated, whole-of-group approach to identifying and addressing risks of modern slavery. As such, this statement addresses the actions taken by all entities within the Craig Mostyn Group. Unless otherwise indicated in this statement, the terms ‘Craig Mostyn Group’, ‘the Group’, ‘our business’, ‘we’, ‘us’ and ‘our’ refer to Craig Mostyn Holdings Pty Ltd and its controlled entities collectively.

This statement has been approved by the Board of Craig Mostyn Holdings Pty Ltd and signed below by the Chair and Chief Executive Officer.



**Neil Kearney**  
Chair of the Board of Directors

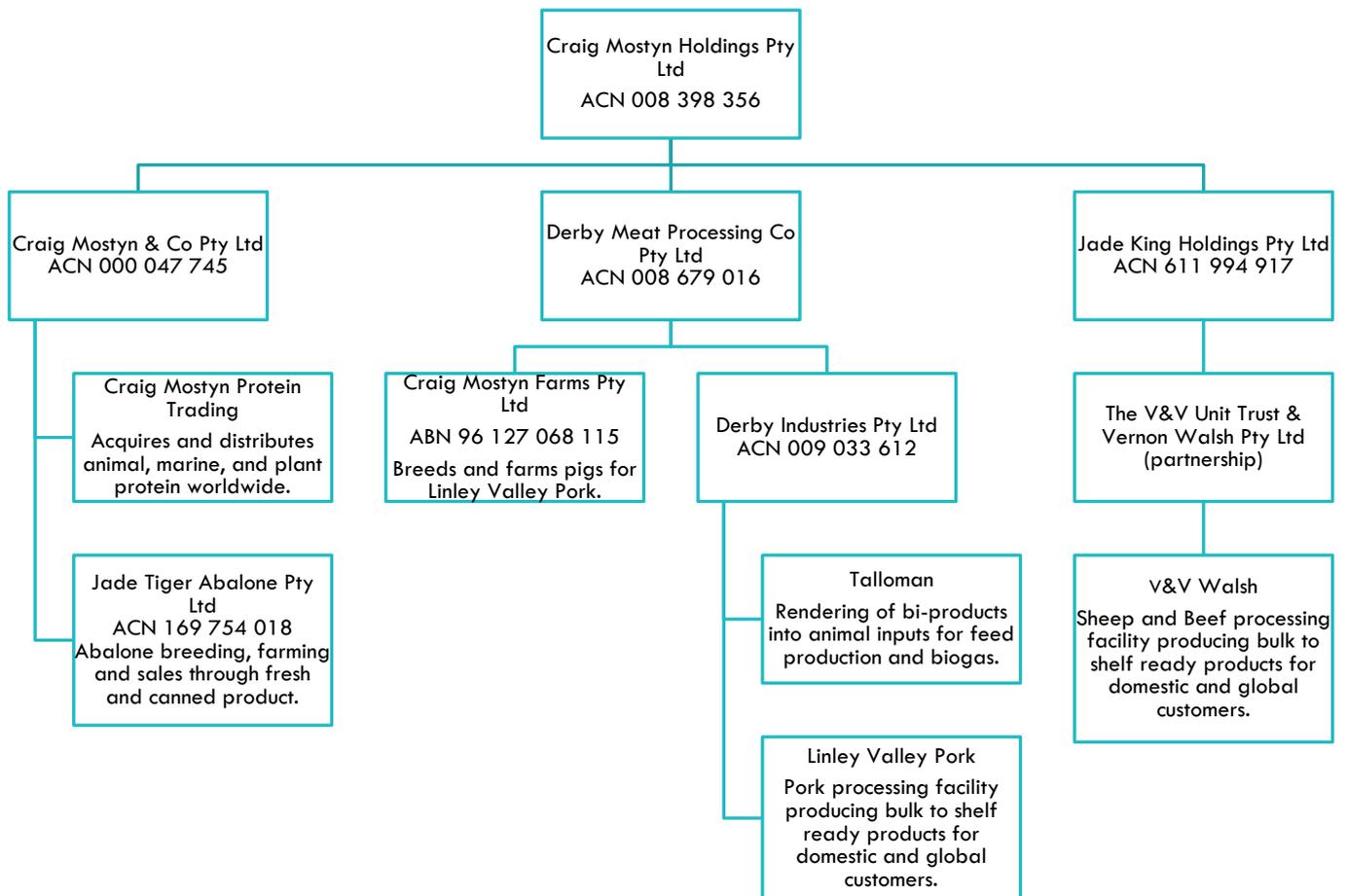


**Wayne Crofts**  
Chief Executive Officer

## OUR STRUCTURE, BUSINESS OPERATIONS AND SUPPLY CHAINS

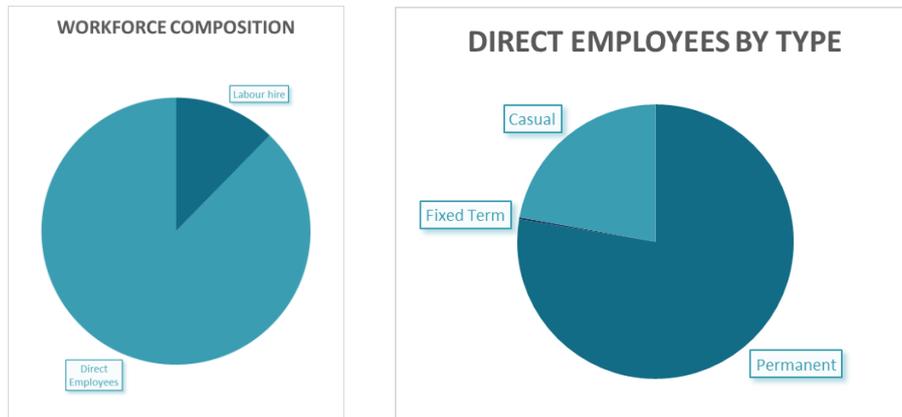
Craig Mostyn Group an Australian private food and agribusiness company with 1,300 employees. The Group services customers both domestically and overseas. We directly employ workers and operate farms and abattoirs in Western Australia for pork, lamb and beef, and abalone farms and processing facilities in Victoria.

### Our Structure



## Our People

On 30 June 2025, the group directly employed 1,300 people across our operations and a further 182 people through labour hire arrangements.



Employee Demographics	Protein Trading	Jade Tiger Abalone	Linley Valley Pork	Craig Mostyn Farms	Talloman	V&V Walsh	Craig Mostyn Group
<b>Direct Employees - Employment Type</b>							
Permanent (full-time and part-time)	8	30	340	95	61	435	<b>1009</b>
Fixed term (full-time and part-time)	1	0	1	0	0	0	<b>3</b>
Casual	1	40	90	11	9	136	<b>288</b>
Australian Employees	50%	57%	45%	36%	70%	55%	<b>52%</b>
Non-Australian Employees on Visas	50%	43%	55%	64%	30%	45%	<b>48%</b>
<b>Labour Hire Workers</b>							
Total by location	0	0	67	0	0	115	<b>182</b>

## Our Supply Chain

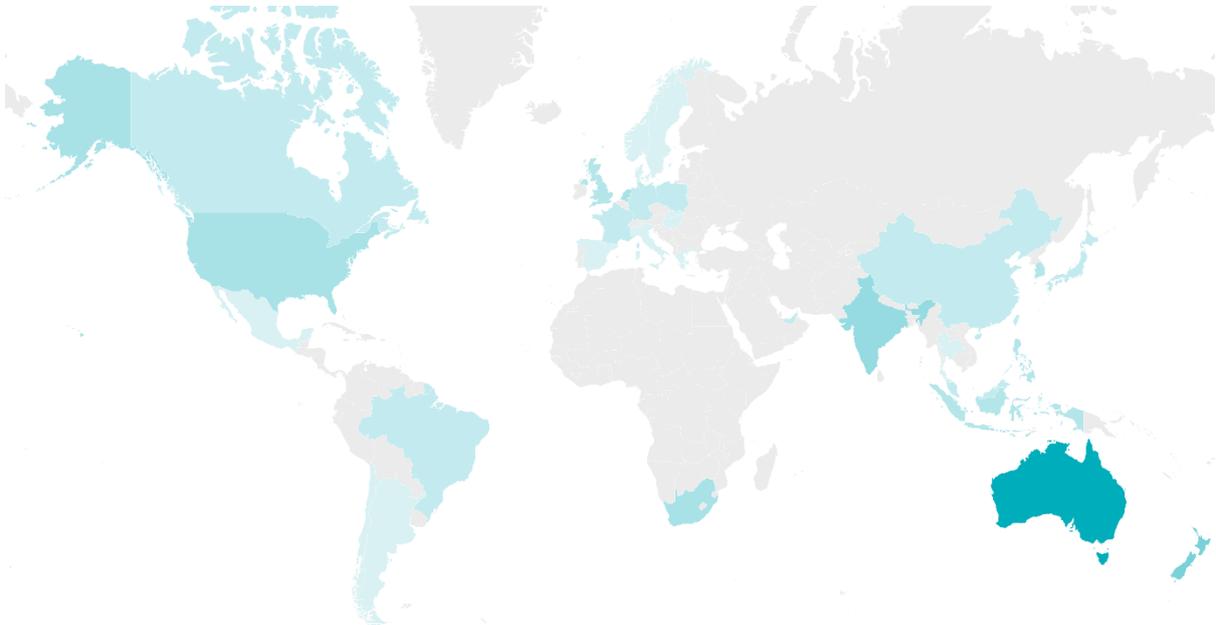
We have supplier relationships working with over 1,600 suppliers, contractors, vendors, and service providers. Where possible, Craig Mostyn Group sources goods and services locally across the agribusiness life cycle, including items such as stock, feed, personal protective equipment, packaging, and chemicals. We recognise that while these supplies may be provided by an organisation domiciled in Australia, they may be sourcing products or raw materials from other origins.

Our suppliers operate in the following sectors:

- Accommodation and Food Service Activities
- Administration and Support Services
- Agriculture, Forestry, and Fishing

- Building services contractor
- Cleaning
- Construction
- Domestic work
- Education
- Electricity, Gas, Steam and A/C supply
- Finance and Insurance
- Government administration, Defence and Social Security
- Health and Social Work
- Information and Communication
- Labour hire
- Maintenance and Repair of motor vehicles
- Manufacturing
- Mining and Quarrying
- Personal services
- Professional and Scientific Services
- Real estate
- Retail
- Security services
- Transportation and Storage
- Water supply, Sewerage and Waste Management
- Wholesale

Our suppliers operate in many locations across the world as indicated on this map. The darker the shading, the higher the number of suppliers from that geographic location:



## MODERN SLAVERY RISKS IN OUR OPERATIONS AND OUR SUPPLY CHAIN

### Risk in Our Operations

We have identified the Modern Slavery Risks arising from our own operations as listed in the table below. These risks occur in all operational sites who all rely on recruitment of international labour hired directly to operate our facilities.

Risk Area	Nature of risk
Forced or bonded labour	<ul style="list-style-type: none"> <li>Foreign employees recruited through third parties in country of origin.</li> <li>Engagement of foreign workers through labour hire providers engaging works under the Pacific Island Labour Mobility (PALM) scheme.</li> </ul>
Exploitation of migrant workers	<ul style="list-style-type: none"> <li>Foreign workers are required to work under conditions less favourable than Australian workers or outside the conditions of their visa.</li> <li>Foreign workers are subject to threats of visa cancellation.</li> </ul>
Deceptive recruitment	<ul style="list-style-type: none"> <li>Debts incurred by foreign workers during recruitment process.</li> </ul>
Underpayment of Wages	<ul style="list-style-type: none"> <li>Employee wages and entitlements are not in accordance with relevant industrial instrument or legislation.</li> <li>Labour Hire wages and entitlements are not in accordance with relevant industrial instrument or legislation.</li> </ul>
Excessive Working Hours	<ul style="list-style-type: none"> <li>Hours of work regularly exceed 60 hours per week.</li> </ul>

### Risks in Our Supply Chain

Our suppliers operate, produce, and source across several different sectors. Some of these sectors can be described as high-risk, where human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

The graphics on the following page show the high-risk sectors of operation, production, and sourcing for our suppliers. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.

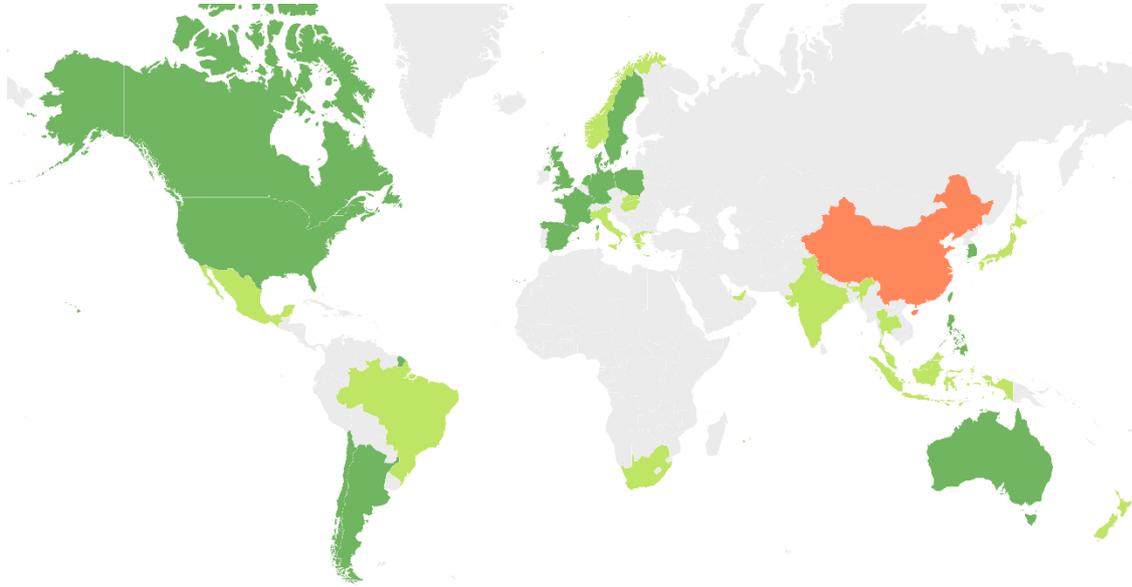
Some of our suppliers produce goods and provide services in the following high-risk sectors:

 Accommodation and Food Service Activities <b>5</b>	 Agriculture, Forestries, and Fishing <b>49</b>
 Building services contractor <b>2</b>	 Cleaning <b>4</b>
 Construction <b>6</b>	 Domestic work <b>1</b>
 Labour hire <b>2</b>	 Maintenance and Repair of motor vehicles <b>4</b>
 Manufacturing <b>28</b>	 Mining and Quarrying <b>6</b>
 Retail <b>8</b>	 Transportation and Storage <b>22</b>
 Wholesale <b>10</b>	

Some of our suppliers source goods and services in the following high-risk sectors:

 Accommodation and Food Service Activities <b>6</b>	 Agriculture, Forestries, and Fishing <b>50</b>
 Building services contractor <b>2</b>	 Cleaning <b>10</b>
 Construction <b>10</b>	 Labour hire <b>6</b>
 Maintenance and Repair of motor vehicles <b>18</b>	 Manufacturing <b>25</b>
 Mining and Quarrying <b>6</b>	 Personal services <b>1</b>
 Retail <b>3</b>	 Security services <b>1</b>
 Transportation and Storage <b>33</b>	 Wholesale <b>10</b>

Some countries or regions where our suppliers operate can be described as high-risk due to the possibility of a link to human trafficking. The geographical regions where our supply chain partners operate are shown in the map below. This map has been overlaid with the colour tier system of the Trafficking in Persons Report prepared annually by the US Department of State.



Code	Tier	Description
<span style="color: green;">■</span>	Tier 1	Country fully meets the minimum standards for the elimination of trafficking.
<span style="color: yellow;">■</span>	Tier 2	Country does not fully meet the minimum standards for the elimination of trafficking but is making significant efforts to do so.
<span style="color: red;">■</span>	Tier 3	Country does not fully meet the minimum standards for the elimination of trafficking and is not making significant efforts to do so.

There is modern slavery risk associated with sourcing the following goods and services from the countries listed below:

Australia	China	Malaysia
<ul style="list-style-type: none"> <li>• Building services contractors</li> <li>• Cleaning</li> <li>• Labour hire</li> <li>• Security services</li> </ul>	<ul style="list-style-type: none"> <li>• Electronics</li> <li>• Garments</li> <li>• Gloves</li> <li>• Textiles</li> </ul>	<ul style="list-style-type: none"> <li>• Rubber Gloves</li> </ul>

## ACTIONS TAKEN

### Policy

Craig Mostyn Group established a Modern Slavery Policy in 2020 outlining the minimum standards both CMG and its suppliers must comply with. The policy was fully reviewed in February 2025 to ensure compliance with the *Modern Slavery Act 2018* and alignment with current processes and future aspiration. The next review will occur in February 2028, when there is a change to our modern slavery risk profile, or if there are changes to relevant legislation, whichever occurs first.

### Grievance Mechanisms – Confidential Reporting

Craig Mostyn Group employees have access to confidentially report issues via telephone, email or in person through a Grievance Procedure and a Whistleblower Policy. The Whistleblower Policy includes protections for Whistleblowers and provides a Whistleblower Hotline operated by a third party to whom reports can be made anonymously.

Signage is provided at all operational sites in multiple languages to ensure employees and labour-hire workers are aware of the process to make an anonymous and confidential report.

Each whistleblower disclosure received is investigated and reported to the Chair of the Audit & Risk Management Committee. The Group's grievance procedure ensures all grievances are managed in a systematic, fair, timely and transparent manner.

No reports relating to Modern Slavery were made via either of these mechanisms in FY25.

### Training for Employees

Craig Mostyn Group provides training to all employees and long-term labour hire contracts on Modern Slavery, our Grievance Procedure and Whistleblower Policy through our induction process. As a result of an audit findings, we've expanded this training to include information on the Ethical Trade base code utilised in Sedex Member Ethical Trade Audits for all team members.

### Operational Risks and Effectiveness of Risk Controls

Approximately 80% of our direct employees and labour hire workers are engaged at Linley Valley Pork and V&V Walsh Meat Processors and Exporters. Both operations are Sedex Members and participate in the Sedex Member Ethical Trade Audit each year that includes an assessment of modern slavery risks in our operations, as well as the presence and effectiveness of risk controls.

In November 2024 Linley Valley Pork participated in a Sedex Members Ethical Trade Audit that found 10 non-compliance items in the following categories:

- 1 related to management systems and the Ethical Trade base code (communication)
- 6 related to safe working conditions (signage and general housekeeping)
- 1 related to use of child labour (policy wording)
- 1 related to provision of regular employment (audit of labour hire providers)
- 1 related to environmental controls (setting targets to reduce water and energy use)

In March 2025 V&V Walsh Meat Processors and Exporters participated in a Sedex Members Ethical Trade Audit that found 5 non-compliance items in the following categories:

- 1 related to management systems and the Ethical Trade base code (communication)
- 3 related to safe working conditions (signage and general housekeeping)
- 1 related to provision of regular employment (audit of labour hire providers)

For both sites, these findings were addressed and remediated within 90 days of each audit, with some findings requiring ongoing training and support that has been put in place via our induction programs and on-site signage in multiple languages.

### Supplier Due Diligence and Risk Assessment

Craig Mostyn Group uses the [iPRO Modern Slavery Assessment Tool](#) to assess modern slavery risks in our operations and supply chain. The risks detailed in the previous section were all identified utilising

this assessment tool. We engaged iPRO in 2024 and since then have had 186 of our suppliers complete the assessment (representing 80% of our procurement spend). Of those, 123 or 66% have completed their self-assessment in iPRO.

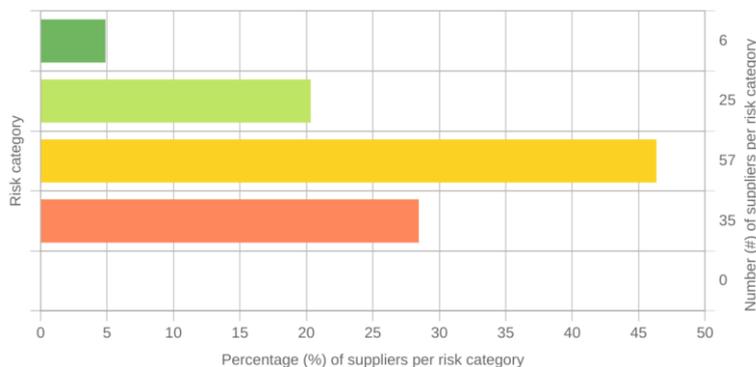
Participating suppliers are asked to complete a self-assessment questionnaire online. After each supplier submits their responses, these were assessed to determine their modern slavery risk scores and associated risk category. The tool allows us to ask suppliers to upload documentation to support their assessment responses.

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

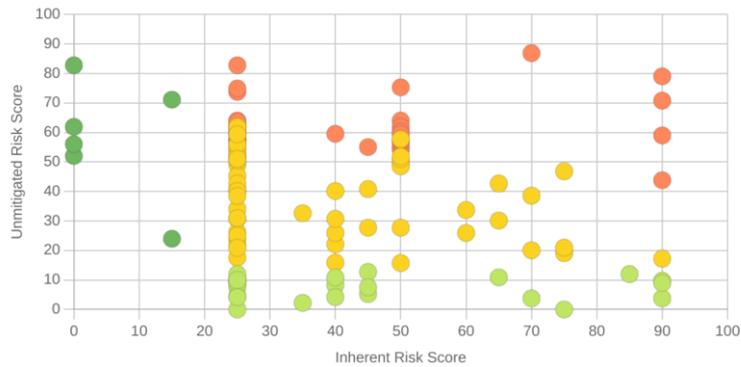
Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain. In 2023-24 Craig Mostyn Group implemented the iPRO system, to strengthen our capability to assess major and high-risk suppliers, prioritise those with significant annual spend or high-risk domiciles and provide guidance of actions to address and reduce modern slavery risks within our supply chain.

Additionally, we conduct due diligence relating to modern slavery risks by utilising the iPRO Modern Slavery Assessment Tool as part of our new supplier procurement process. As part of a new suppliers onboarding, they will complete the modern slavery assessment in addition to our other quality and compliance checks.



Risk categories	% of suppliers per risk category	# of suppliers per risk category
■ Low-Risk (No inherent risk)	4.9%	6
■ Low-Risk (Adequate risk control)	20.3%	25
■ Medium-Risk (Partial risk control)	46.3%	57
■ High-Risk (Inadequate risk control)	28.5%	35
■ High-Risk (High levels of inherent risk)	0%	0



The scatter chart above compares all assessed suppliers according to both their unmitigated risk and inherent risk scores.

We provide support to suppliers within the medium and high-risk categories, through iPRO’s resource planning tools. Each supplier is provided with a tailored action plan to provide post-assessment guidance to help mitigate identified risks.

SUPPLIER ASSESSMENTS / SUPPLIERS / TOPHAM BROTHERS  
Supplier Action Plan

The Action Plan is designed to help this supplier reduce their modern slavery risk. The actions below are based on their assessment responses, and are prioritised in order of their impact on the supplier’s unmitigated risk score.

Not yet completed actions    Completed actions

INFORMATION REQUIRED	Unmitigated risk
Supplier to assess whether they enrol workers in annual modern slavery, human trafficking and child labour risk awareness education and training <a href="#">1 Linked question</a>	7.49 unmitigated risk
Supplier to assess whether they issue a modern slavery risk compliance policy to its suppliers <a href="#">1 Linked question</a> <a href="#">Resource available</a>	6.74 unmitigated risk
Supplier to assess whether they issue a continual modern slavery risk identification and assessment process to its operations <a href="#">1 Linked question</a>	3.75 unmitigated risk
Supplier to assess whether they issue a vulnerability assessment policy <a href="#">1 Linked question</a> <a href="#">Resource available</a>	3.75 unmitigated risk
Supplier to assess whether they issue a withholding worker identity and immigration documents policy <a href="#">1 Linked question</a> <a href="#">Resource available</a>	3.00 unmitigated risk
Supplier to assess whether they issue a recruitment fees policy <a href="#">1 Linked question</a> <a href="#">Resource available</a>	3.00 unmitigated risk

CURRENT

- **High-Risk (Inadequate risk control)**  
59.41 Unmitigated risk

Reduce unmitigated risk by 0.85

NEXT TARGET

- **Medium-Risk (Partial risk control)**  
58.56 Unmitigated risk

**Reduce your risk score**  
Subscribe your suppliers to the iPRO Modern Slavery Policy Framework. Suppliers can access policy templates to customise for their own business. [Learn more](#)

Our supplier due diligence and onboarding process are in the final stages of development, with a plan to implement these in FY26.

## EFFECTIVENESS OF ACTIONS TAKEN

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Providing information on utilising grievance mechanisms in multiple language has been noted by employees, but as mentioned earlier in this statement, has not led to an increase in issues reported.

Training at the point of commencing highlights to employees both the importance of preventing modern slavery from occurring in our operations or supply chain but also ensure they are aware there is a process to make confidential and protected reports if they observe or experience actions misaligned with our intent.

The iPRO system has improved our data collection and analysis processes, and expanding coverage to all high-risk suppliers remains a priority. Our focus for the coming year is to maximise iPRO's capabilities to develop a more comprehensive, proactive risk management approach.

## CONSULTATION PROCESS

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The General Managers of each operational business unit were consulted in the risk assessment process outlined in this statement. Input was also sought from the following teams:

- Quality
- Safety
- People, Culture & Sustainability
- Procurement
- Information Technology
- Finance

## OTHER INFORMATION & LOOKING AHEAD

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In FY26, we will continue to improve the way we approach and manage Modern Slavery risks in our operations and our supply chain. A summary of the key actions planned is below:

1. Increase the number of suppliers who have completed self-assessments within the iPRO system.
2. Implement the supplier onboarding process and due diligence assessments.
3. Offboard approximately 400 inactive suppliers from our systems.
4. Review and update training programs for leaders in relation to identifying and managing Modern Slavery risks.