



Modern Slavery Statement

Bertocchi Smallgoods Pty Ltd

Reporting Period: 1st July 2025 – 31st December 2025

1. Reporting Entity

This Modern Slavery Statement is made by Bertocchi Smallgoods Pty Ltd, ABN: 58 163 884 982 in accordance with the Modern Slavery Act 2018.

This statement applies to Bertocchi Smallgoods Pty Ltd and any entities it owns or controls.

2. Structure, Operations and Supply Chains

Structure

Bertocchi Smallgoods Pty Ltd is an Australian-owned company headquartered in Thomastown, Victoria. The Company operates under a senior management structure led by the Chief Executive Officer, supported by operational, production, quality and compliance functions.

Operations

The Company manufactures and distributes smallgoods products, including ham, bacon and continental smallgoods. Its primary operations include:

- Meat processing and manufacturing
- Packaging and storage
- Distribution to retail and commercial customers

Supply Chains

Bertocchi's supply chain includes:

- Raw materials (e.g. pork and other meat products)
- Packaging materials (e.g. plastics, cartons)
- Labour hire and service providers
- Equipment and maintenance suppliers
- Logistics and transport providers

Supply chains are predominantly Australian-based, with some potential exposure to international suppliers through indirect procurement (e.g. packaging or equipment components).



3. Risks of Modern Slavery Practices

Bertocchi recognises that modern slavery risks may exist within both its operations and supply chains. Key risk areas include:

- **Upstream supply chains:** Agricultural and meat sourcing industries may involve risks such as forced labour, exploitation of migrant workers, and poor working conditions.
- **Labour hire and temporary workforce:** Use of agency workers may increase the risk of underpayment, coercion or lack of oversight.
- **Manufacturing and processing environments:** Labour-intensive processes may present risks if not appropriately managed.
- **Indirect suppliers:** Suppliers of packaging, equipment or imported goods may operate in higher-risk jurisdictions.

At this stage, Bertocchi has not identified any confirmed instances of modern slavery within its operations.

4. Actions Taken to Assess and Address Risks

Bertocchi has implemented and continues to develop processes to assess and address modern slavery risks, including:

Risk Assessment

- Conducting periodic reviews to identify areas of higher risk within operations and supply chains.
- Prioritising high-risk suppliers and activities for further assessment.

Due Diligence

- Engaging with suppliers to understand their policies and controls relating to modern slavery.
- Incorporating contractual clauses prohibiting forced labour, child labour, and human trafficking.
- Requiring suppliers to comply with applicable laws and ethical standards.

Internal Policies and Governance

The Company maintains policies that support ethical conduct and human rights, including:

- Code of Conduct
- Whistleblower Policy
- Equal Opportunity & Anti-Discrimination Policy
- Risk Management Framework

Training and Awareness

- Providing training to relevant employees and managers on modern slavery risks and responsibilities
- Promoting awareness of reporting mechanisms



Remediation

- Establishing processes to investigate any reported concerns
- Taking appropriate corrective action, which may include supplier engagement, remediation, or termination of business relationships where necessary.

5. Assessing Effectiveness

Bertocchi monitors the effectiveness of its actions through:

- Periodic Management Review processes
- Monitoring supplier compliance and engagement outcomes
- Tracking completion of training and awareness initiatives
- Reviewing any reported incidents or concerns

The Company is committed to continuously improving its approach to identifying and addressing modern slavery risks.

6. Consultation Process

Bertocchi consults internally with senior management and relevant business units, including operations, procurement, and compliance functions, in the development and implementation of this statement.

Where applicable, consultation also occurs with any entities owned or controlled by the Company to ensure alignment in managing modern slavery risks.

7. Other Relevant Information

Bertocchi Smallgoods is committed to operating with integrity and respecting human rights across all areas of its business. The Company continues to strengthen its systems, processes, and supplier engagement to mitigate modern slavery risks and promote ethical practices.

8. Approval

This Modern Slavery Statement has been approved by the Board of Directors of Bertocchi Smallgoods Pty Ltd in accordance with the requirements of the Modern Slavery Act 2018.

Approved by:

Peter Paolino
Group Chief Executive Officer

Date: 04/05/2026