



Modern Slavery Statement
Annual Report 2024
Australian Country Choice

AUSTRALIAN COUNTRY CHOICE GROUP

**Australia's largest
family-owned vertically integrated
cattle and beef supply chain**

1,300+ staff

300,000 cattle capacity

42 properties totaling 1.75 million ha

320,000 head annual processing capacity



**We feed the world
with safe, sustainable
and wholesome
protein**

Australian Country Choice – Modern Slavery Annual Statement

This statement is issued pursuant to s14 of the Modern Slavery Act 2018 (Cth) (the Act) and sets out the actions taken by Australian Country Choice Holdings Pty Ltd and the ACC Group to address modern slavery risks in our business and supply chains for the financial year ended 30 June 2024.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

The ACC Group is Australia's largest family-owned and operated vertically integrated cattle and beef supply chain organisation. It comprises a whole of chain operation including seedstock production, cattle breeding, backgrounding, farming and lot-feeding through to beef primary processing and multi-specie further processing, retail packing and distribution.

Our group of companies is dedicated to best-practice supply of high quality meat products to domestic and export markets.

The ACC Group specialise in producing grain-finished cattle and beef and we have diversified our supply chain to include producing high-quality, long-fed cattle to further service the demands of customers in the premium beef market.

The ACC Group corporate headquarters are located at Cannon Hill, Brisbane. We have a dedicated meat processing facility and 42 rural assets comprising 1.75 million hectares of pastoral, grazing and farming land that can accommodate up to 300,000 cattle. All our sites are located in Queensland.

Our workforce comprises more than 1,300 employees in Queensland, complemented by contractors and agents who provide support services. Our direct employees are engaged either by contract or under enterprise agreements. We currently have six collective industrial instruments implemented across the ACC Group.

ACC Group utilises a significant number of suppliers for a range of goods and services, from waste management to power supply, transportation, corporate attire and labour hire. Supplier services are used across the whole of business operations to varying degrees, including corporate office services, land, animal and production management activities.

During the FY2024 year, we engaged with more than 2,200 suppliers, predominantly located in Australia. Like many employer sectors, agriculture and food manufacturing has had to cope with constrained labour availability and challenging market impacts on the business.

ACC obtains confirmation from external labour hire entities as to their compliance with ACC's vendor Code of Conduct which embodies, amongst other things, obligations relating to eliminating modern slavery. These providers have been able to source Pacific workers for ACC under the Pacific Labour Scheme (PLS). ACC is proud to be able to offer opportunities to PLS workers to develop skills, earn income to support their families and communities both in Australia and their home countries.

We recognise that the diversity of our operational locations, products, customers and the regulatory systems associated with our supply chain can potentially expose the Group to a myriad of risks. We apply a systematic, best-endeavours approach to our risk disciplines, including in our procurement practices and engagement with suppliers, which we know is an essential element in progressing the global eradication of modern slavery and human trafficking.

POLICIES AND GOVERNANCE

ACC Group has a corporate governance framework in place. Underpinning this framework are the Group's suite of policies, several of which are relevant to modern slavery. These include

- Code of Conduct
- Procurement Policy
- Standard Supplier Terms and Conditions
- Anti-bribery and Corruption Policy,
- Whistleblower Policy
- Yong People in the Workplace Policy
- Ethical Sourcing and Modern Slavery Policy.

The Compliance and sustainability statement is published on the ACC Group website, which also contains more detail on our approach to corporate governance and ethical operations.

The Group's executive team, reporting through the Chief Executive Officer, is accountable for the development and implementation of our broader human rights program, including modern slavery initiatives. Accountability for addressing modern slavery risk is cross-functional and our internal business units work together at a Group level and across our entities to embed our initiatives and supporting processes. In recognition of the complexity of this global issue, the ACC Group continues to grow and develop the capabilities of our people in relation to modern slavery risk management, including seeking external expertise and input for guidance on our approach.

ACC maintains a multi-faceted approach to training delivery, including online and face-to-face training, along with distributing policy handbooks to ensure comprehensive training for new employees regarding modern slavery risks, identification and reporting requirements.

Continuous Improvement Actions

We continue to communicate our expectations to suppliers through our annual reviews and contract tenders. We source conformation from suppliers on their governance and practices in regards to modern slavery utilising questionnaires as standard inclusions within our supplier terms and conditions of engagement. We continue to implement our Supplier Code of Conduct ("Code"), which Suppliers are required to acknowledge. This Code embodies obligations to protect human rights, environmental and animal welfare compliance. It details expectations relating to the ethical behaviour of our suppliers and obliges suppliers to ensure the Code is applicable throughout their supply chain.

RISK ASSESSMENT AND MITIGATION

ACC Group has in place an enterprise risk management approach that is aligned to the Australian Standard for risk management, AS ISO 31000:2018.

The approach is strategic and covers the totality of ACC Group operations, including its supply chain, and captures activities including:

- Risk identification (what are our risks);

- Risk analysis (source, nature, type/category of our risks);
- Risk evaluation (how significant is the risk – what is the impact to us);
- Risk treatment (what are our policies, procedures and processes to mitigate).

The risk framework is developed using a collaborative engagement process to ensure the voice of the business is represented. Where appropriate we also take into account third-party inputs as part of the process to understand our risks, assess those impacts and design the tools and mechanisms to manage those risks. Monthly Executive meetings review high risk areas and associated action plans together with policy review and updates.

For ACC Group, modern slavery risk is addressed through a number of areas and mitigated accordingly – for example, child labour is contemplated in our human resources risk category and we have procedures in place for recruitment that address factors such as identity, background and reference checking and right to work screening.

The mitigation tools are documented, and each business area has in place training that is relevant for their risks, including process mapping, policy and procedures.

For specific areas of our business operations and supply chain, there are additional assurance metrics in place – as an example, our meat-processing facilities and production are required to conform to a range of standards and certifications which are subject to additional external assurance activities.

Employee Wellbeing

Our commitment to the wellbeing of employees was recognised by state and national safety awards acknowledging our commitment to our employee, customer and supplier safety. Third-party confidential support is offered through an Employee Assistance Program and mental health training is in the process of delivery. Our onsite Wellbeing Centre provides an opportunity for our staff to take some ‘time out’ in a quiet room for reflection. ACC have engaged in third party programs to facilitate onsite confidential counselling services.

DUE DILIGENCE AND SUPPLY CHAIN ASSURANCE

Due Diligence

ACC Group engages with suppliers for a wide range of services and has in place a long standing practice of undertaking due diligence on prospective and existing suppliers to ensure we are doing business with like minded organisations.

Key suppliers remain subject to a screening process through tendering of supply and once those services are being provided, we continue to monitor performance, delivery of contract commitments and quality of that delivery through in-person engagement.

Supply Chain Assurance

Part of our approach to managing supplier relationships is the ongoing management of the contracts we have in place. We have a dedicated ‘owner’ for each supplier who is the lead relationship manager and has accountability for day-to-day management of that relationship, identifying any issues, resolving and remediating operational issues and raising any concerns that might occur about the supplier, their practices and/or the services being provided.

Additionally, we have standard terms for suppliers that require ongoing reporting as to their performance to the terms of the contract and authorise site inspections and access to their

external audit firm and relevant regulatory authorities to discuss any issues, concerns about matters of relevance that might impact our relationship, including modern slavery risk (resulting from the obligations arising under the Supplier Code of Conduct).

Grievance and Remediation

We have established procedures and mechanisms where employees and third parties, including suppliers, can raise concerns about unethical or illegal conduct, including in relation to modern slavery.

Employees can report through their direct line manager, to our Human Resources unit or to our Chief People & Compliance Officer. Our people and third parties can maintain anonymity and report issues through our Whistleblower procedures, via phone or email.

MEASURING EFFECTIVENESS

Globally, we acknowledge there is an increasing level of effort being made to understand and value human rights, however there is no current mechanism or international standard available to measure the impact of modern slavery. This poses a challenge for us in having a credible means of determining the effectiveness of the measures we take to manage our modern slavery risk.

We rely on guidance provided from the Australian Government Department of Home Affairs, which utilises resources available from each of the United Nations (UN Guiding Principles on Business and Human Rights) and the Organisation for Economic Cooperation and Development (OECD Guidelines for Multinational Enterprises) as the foundation for our approach to managing modern slavery risk.

The risk of modern slavery to the ACC Group operations and supply chain is considered within a broader risk management approach, that framework is based on the current Australian and international standard, AS ISO 31000:2018

Risk Management Guidelines

Within our supply chain processes, we have certain mechanisms that provide us with the capability to assist in tracking the effectiveness of our program. As an example, if one of our suppliers were the subject of an ethical audit and action plans to mitigate issues were in place, we could work with that supplier to ensure they have taken the required steps to address those issues as part of the standard terms of contracting with that supplier.

We also have a range of internal policies and procedures that we utilise every day in our own business operations, which are subject to assurance and monitoring activities, both internally and from our external specialists. Part of the internal mechanisms in place is the periodic review and assessment of those policies, procedures and processes to ensure they are current, relevant and deliver the expected outcomes.

We also undertake numerous internal and external audits some of which include the Sedex SMETA business audit, McDonalds approved supplier audit, as well as other customer audits to ensure our people and processes are compliant with modern slavery guidelines amongst other good business practices.

STAKEHOLDER AND INDUSTRY ENGAGEMENT AND COLLABORATION

At ACC, we know that stakeholder engagement and collaboration are key to successfully delivering our strategic priorities, and that they capture a wide scope of interests ranging from

our own people to external groups, including our suppliers, the communities in which we operate and relevant government agencies. Collectively these stakeholders can give effect to change in how we manage modern slavery risk.

We will undertake our best endeavours to work collaboratively with government and business in eradicating modern slavery. We recognise this needs a coordinated approach in addressing our operations and those of our supply chains. We achieve this through industry consultation across peer businesses and engagement with industry representative bodies.

TRAINING AND CAPABILITY BUILDING

ACC Group is committed to ensuring our people are provided with access to and training in all of the core policies, principles, brand values and conduct expectations that underpin our business.

Training and awareness are key controls in addressing the risks posed by modern slavery. We recognise the need to ensure that we build the capabilities of directors, executives and employees to understand why this is important and how we are approaching managing the risk.

ACC Group has continued to build on its learning and development capability regarding modern slavery risks posed to our business operations and supply chains. This has included embedding this training in leadership development programs in conjunction with a multi-faceted approach to staff knowledge development through various learning mediums.



ACC Group continues to develop this specific training for our employees by investing in technology that allows us to provide training in various formats that are culturally specific to our diverse workforce.

We are committed to the ongoing delivery of initiatives and partnering with our stakeholders to eradicate modern slavery.

This Annual Statement was approved by the principal governing body of Australian Country Choice Group on 25 January 2025.

Signed

A handwritten signature in black ink, appearing to read 'Trevor Lee'.

Trevor Lee
Director

