



MODERN SLAVERY ACT COMPLIANCE STATEMENT

Greenham Group of Companies includes:

- HWG Holdings Pty Ltd
- HW Greenham & Sons Pty Ltd
- Greenham Tasmania Pty Ltd
- Greenham Gippsland Pty Ltd
- Greenham Pastoral Tasmania Pty Ltd

Identify the reporting entity

The Head Office of the Greenham Group of Companies is located at 222 Lorimer St., Port Melbourne, Victoria, 3207.

This statement sets out the Greenham Group of private companies (HWG) actions to understand all potential modern slavery risks related to its business activities and to put in place steps that are aimed at ensuring there is no slavery, forced and bonded labour or human trafficking in its business and supply chains.

HWG, including its associated and subsidiary companies, recognises that it has a responsibility under the Modern Slavery Act 2018, and is committed to preventing slavery, forced and bonded labour or human trafficking in its business activities and to ensure, as far as reasonably possible, that our supply chains are free from slavery, forced and bonded labour or human trafficking.

HWG has reviewed the Global Slavery Index to identify areas within its operations require greater scrutiny.

Describe the reporting entity's structure, operations and supply chains

HWG is a leading processor of beef and producer of beef products to both international and domestic customers. HWG has beef processing operations in Victoria (2) and Tasmania and a Head Office and distribution centre in Victoria, and our reporting supply chains are predominately based within Australia.

Describe the risks of modern slavery

HWG will introduce an annual program reviewing all internal processes and major supply chains to assess the risk and likelihood of slavery, forced and bonded labour or human trafficking impacting the business.

The meat processing industry has been identified as an 'at risk' industry, by the Global Slavery Index, with regards to contributing to slavery practices through bonded employment arrangements, forced labour and poor employment / wage rates applied. As a result, HWG will take a proactive approach to ensure the risk exposure to contractors and HWG employees is eliminated through an annual review and audit process.

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The agriculture sector has been identified as an 'at risk' sector, by the Global Slavery Index, with regards to contributing to slavery practices through child labour, forced labour and poor housing conditions. As a result, HWG will take proactive approach to ensure the risk exposure to contractors and HWG employees is eliminated through an annual review and audit process.

HWG will undertake due diligence when considering taking on new suppliers, and review our existing suppliers on a periodic basis. Our due diligence and reviews include:

- Reviewing our existing supply chain to assess particular product or geographic risks of slavery, forced and bonded labour or human trafficking.
- Evaluating the slavery, forced and bonded labour or human trafficking risks of each new supplier.
- Conducting supplier audits and seeking supplier self-audits which include slavery, forced and bonded labour or human trafficking requirements.
- Preparedness to invoke sanctions where suppliers fail to improve their performance with an action plan or seriously violate our own supplier code of conduct, including the termination of the business relationship in the most extreme of cases.

Describe the actions taken

HWG will undertake an annual review of all labour hire suppliers to ensure employment practices and wage rates paid meet minimum legal requirements and that no labour hire contractors are employed under any bonded arrangement.

HWG will seek modern slavery statements from all major suppliers and seek their compliance with the Modern Slavery Act 2018.

HWG has introduced a HWG Code of Conduct and a HWG Child Labour Policy to ensure compliance within its own operations.

HWG has introduced an HWG Values statement, namely:

- Integrity – we are ethical, transparent and inclusive in all dealing with suppliers and customers;
- People – we value our employees and work together to better our industry;
- Safety – we provide a safe and healthy workplace for all our staff, contractors and visitors;
- Ideas – we embrace innovation and are driven by an improvement culture
- Community – we are ardent supporters of local communities and organisations, particularly in rural areas.

In support of our initiatives to identify and eliminate slavery, forced and bonded labour or human trafficking.

Describe how effective the actions taken are

Through this process HWG have identified areas of improvement for labour hire companies operating within HWG and have eliminated all bonded arrangements that have been in operation.

HWG will continue to review and monitor its own performance against these standards.

HWG will seek assurances from major suppliers that they will comply with child labour legislation and not engage any forced child labour in the HWG supply chain.

HWG will utilise the services of third party auditors to annually review current HR and employment practices to ensure minimum acceptable standards are maintained in regards to Modern Slavery Act 2018. (e.g. Sedex)

Describe the process of consultation

HWG will consult directly with all major suppliers and those suppliers who are assessed as 'at risk', seeking their commitment in writing to complying with the Modern Slavery Act 2018 and seeking their voluntary compliance to HWG standards in these areas.

HWG will consult directly with all employees in relation to the expectation of all employees and leaders with regard to preventing slavery, forced and bonded labour or human trafficking within the HWG supply chain.

Provide any other relevant material

Policies

HWG has a number of policies that support our approach to the identification of modern slavery risks and the steps taken to prevent slavery, forced and bonded labour or human trafficking in our operations:

- HW Greenham Code of Conduct (incorporating business ethics and whistleblower procedures)
- HW Greenham Child Labour Policy (incorporating child labour and child work practices)
- HW Greenham Equal Employment Opportunity and Anti Bullying Policy (incorporating discrimination, harassment and sexual harassment procedures)
- HW Greenham Mission and Values (see below)

Due Diligence / Raising Awareness

As well as training all leaders and our employees, HWG has raised awareness of modern slavery issues by circulating regular information to employees, including:

- Basic principles of the Modern Slavery Act,
- How employers / employees can identify and prevent slavery, forced and bonded labour or human trafficking,
- What employees can do to identify potential slavery or human rights issues with relevant parties within HWG and where can we obtain external assistance when needed.

Signed by Joint Managing Directors:



Grant Ryan
Managing Director



Peter W Greenham
Managing Director

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