# MODERN SLAVERY STATEMENT 2024

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# 1. IDENTIFY THE REPORTING ENTITY

BE Campbell Pty Ltd (ABN 97 164 598 120) as trustee for BE Campbell Unit Trust is an Australian family owned and operated company based in New South Wales (NSW). BEC processes and distributes fresh Australian meat and meat products, specialising in pork cuts. The company employs approximately 600 staff, selling its products to multiple sales channels including supermarkets, retail butchers and other food service providers.

This Modern Slavery Statement ('the statement') has been developed in accordance with the Commonwealth's Modern Slavery Act 2018 for the calendar year ending 31 December 2024.

This statement is intended to meet the requirements of section 16 of the Modern Slavery Act 2018 (Cth) and outlines the steps taken by BE Campbell during 2024 to seek to minimise the risk of modern slavery occurring in our businesses and supply chains.

This Statement has been approved by the principle governing body, the Board of Directors of BE Campbell Pty Ltd on 24th June 2025.

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Chairman BE Campbell

BE CAMPBELL

# 2. STRUCTURE, OPERATIONS & SUPPLY CHAIN

BE Campbell's operations are located in Sydney Australia and consist of two production plants, a fleet of transport vehicles, a Head Office site and the workers it directly employees.

The company's supply chains include Australian farms that produce livestock, Australian abattoirs that provide slaughter services, and transport providers that deliver both raw materials to BE Campbell and later finished goods to end customers.

Other goods that are procured include ingredients, packaging, personal equipment and clothing, and machinery required in the production process. Additionally, BE Campbell's supply chain extends to services that contribute to its operations such as cleaning, contractors, security and labour hire services.

## PIG GROWING

Pig production takes place on farms located across Australia with primary inputs being grain, feed supplements as well as medications

## PIG SLAUGHTER

Live pigs are transported to one of 7 export accredited abattoirs across the country to be slaughtered. Slaughter facilities are similar to our production plants with significant labour involved and machinery required. Some additional meat is sourced from 3rd parties in Australia.

## PIG PROCESSING

BE Campbell Pty Ltd operates in the processing segment of the industry which is the deboning of chilled pig carcasses and further processing into value added meat products for distribution to a wide range of customers across different sales channels. Other than manual labour, other inputs include PPE, equipment such as gloves and knives, machinery and cleaning services. Contingency labour is also used to supplement a permanent workforce.

## DISTRIBUTION

Finished goods are loaded onto a company owned fleet od trucks manned by permanent employees for delivery to end customers.

## SALES CHANNELS

Delivery takes place to a range of customers across different channels, for on sale to consumers of for processing

## 3. RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN

BE Campbell have undertaken a review of potential risk of modern slavery practices across our operations and supply chains using a Risk Management Framework supplemented with publicly available risk indicators.

1. Internal Labour Practices: Underpayment of wages and excessive working hours.
2. Contingent Labour Hire: The Labour Hire industry brings a level of inherent risk associated with incidences of underpayment of wages and exploitation of migrant workers.
3. Overseas labour: Sourcing labour from Southeast Asian countries brings the risk of workers being indebted to current employers for the opportunity to work in Australia.
4. Imported goods: BE Campbell imports some products that are utilised in the production process such as PPE, consumables, and electronics from countries with varying risk levels. In addition, there are some (non-pork) food products that BE Campbell imports and sells as part of a basket of goods to foodservice customers.
5. Other Supply Chain risks: Throughout the supply chain there are operations such as farms and processing facilities that we utilize. These operations would have some risk attached to them with regards to migrant workers, deceptive recruitment, excessive working hours.

## 4. ACTIONS TAKEN IN 2023 TO ASSESS AND ADDRESS RISKS

BE Campbell focus during 2023 was to strengthen the governance and risk management framework of potential Modern Slavery risks in our Operations and Supply Chain. Actions undertaken include:

- Achieved 90% supplier participation in our modern slavery screening and risk assessment questionnaire through ongoing enhancements to our Supplier Management system.
- Conducted monthly audits of all labour hire agencies utilised across all sites to ensure compliance with obligations in relation to pay rates, pay documentation, superannuation, and forced labour practices.
- Interview staff from labour hire companies to verify employment and payment practices.
- Due diligence with overseas recruitment agents, full payment of recruitment trip to countries to source labour, supply of own skills assessor, and support for worker visa costs.
- Payroll staff located on site for designated days per week for staff to access and ask questions specific to their pay.
- Completed the SEDEX Ethical Audit which demonstrates our commitment to ethical business and employment practices against the global ethical standards aligned to the ILO.

## 5. HOW WE ASSESS OUR EFFECTIVENESS

BE Campbell measures our effectiveness in mitigating modern slavery in our operations and across our supply chain through the following ways:

- Develop actions to strengthen our approach to Modern Slavery risks.
- Drive meaningful engagement with our supply chain partners to bring them on the journey and ensure full understanding of our commitments.
- Regular meeting of our modern slavery working group to effectively oversee the implementation of agreed action plan.
- Report regularly to the BE Campbell Board of Directors and Senior management
- Participate in the SEDEX Ethical Audit Program

### MODERN SLAVERY WORKING GROUP

Led by BEC Chief Sales and Marketing Officer in conjunction with a cross functional team including Human Resources and Supply Chain.

### EXECUTIVE LEADERSHIP TEAM

ELT consisting of Managing Director, COO, CFO, CSCO, CHRO and CSMO oversee the Working Group and approve process implementation.

### BOARD OF DIRECTORS

Approval and sign off on BE Campbell Modern Slavery Statement.

## 6. CONSULTATIVE PROCESS ACROSS BEC

We do not own or control any other entities and therefore this criteria is not applicable.

BE CAMPBELL
Enriching lives through wholesome food.