

A man wearing a dark cap and a blue apron over a light-colored shirt is smiling and standing in a large pigpen. He is surrounded by many white piglets. The background shows the metal structure of the farm building.

**BE CAMPBELL**

**MODERN SLAVERY  
STATEMENT 2021**

*Enriching lives through wholesome food.*

# CONTENTS

1. IDENTIFY THE REPORTING ENTITY
2. STRUCTURE, OPERATIONS & SUPPLY CHAIN
3. RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN
4. ACTIONS TAKEN IN FY2021 TO ASSESS AND ADDRESS THOSE RISKS
5. HOW WE ASSESS OUR EFFECTIVENESS
6. CONSULTATIVE PROCESS



## 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 2021.

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 FY21 to seek to minimise the risk of modern slavery occurring in our businesses and supply chains.

This Statement has been approved by the Board of BE Campbell.

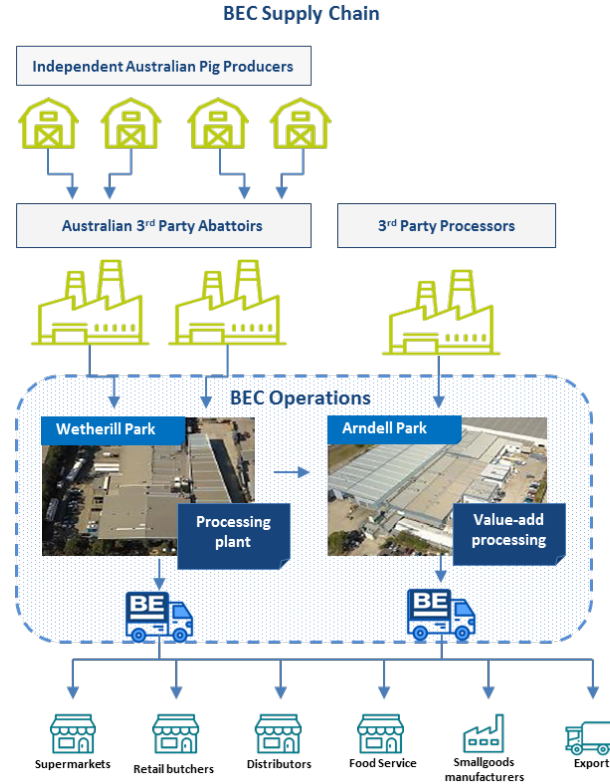
Ted Campbell  
Managing Director

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

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 3<sup>rd</sup> parties in Australia.

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.

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

Delivery takes place to a range of customers across different channels, for on sale to consumers or for further 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. **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.
4. **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 FY2021 TO ASSESS AND ADDRESS RISKS

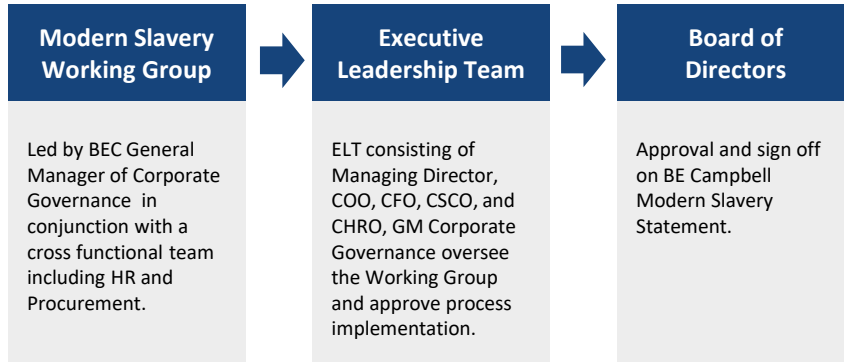
In 2021 BE Campbell continued to build out its governance structure and risk management framework surround Modern Slavery risks in our Operations and Supply Chain. Actions we undertook include:

- Launched our overarching Sustainability Strategy, '**A Better Tomorrow**', focusing on four key areas: BEC Family, Partners, Community and Environment. Strategy strengthens our approach to modern slavery as well as general employee health and wellbeing.
- Continued Modern Slavery Training sessions and in progress of developing an online module as part of our BEC Academy learning and development software.
- Implementing a Supplier Management Module on Donesafe Software enabling us to effectively populate and track all vendor information, details, insurance certificates and compliance obligations including modern slavery declarations.
- Participated in Human Rights Reporting and Assessments by being audited and reporting under SEDEX Members Ethical Trade Audit Report which requires us to demonstrate our commitment to respecting human rights and ethical business practices.
- Conducted an annual review of positions within the organization that are effected by the introduction of annualised wage arrangements. In conjunction with Australian Business Lawyers, the internal compliance check ensured that our salaries are compliant with relevant awards and industrial instruments.

## 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
- Quarterly 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



## 6. CONSULTATIVE PROCESS ACROSS BEC

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

**BE CAMPBELL**

*Quality Australian Meat Family Owned Since 1969*