



**MODERN SLAVERY STATEMENT
FY2025**

TABLE OF CONTENTS

- 5 About this Statement
- 6 Inghams' Operations and Supply Chains
- 12 Description of Modern Slavery Risks in our Operations and Supply Chains
- 16 Governance Framework
- 24 Assessing our Effectiveness
- 25 Any Other Relevant Information



Inghams upholds high standards of conduct and welcomes feedback to improve our due diligence practices within our operations and supply chains. If you have concerns about modern slavery, potential human rights issues or unethical behaviour in our operations or supply chain, we encourage you to contact us to raise your concern anonymously through our third-party provider, Citation HR.

Australia

1300 130 423
inghams@hrassured.com.au

New Zealand

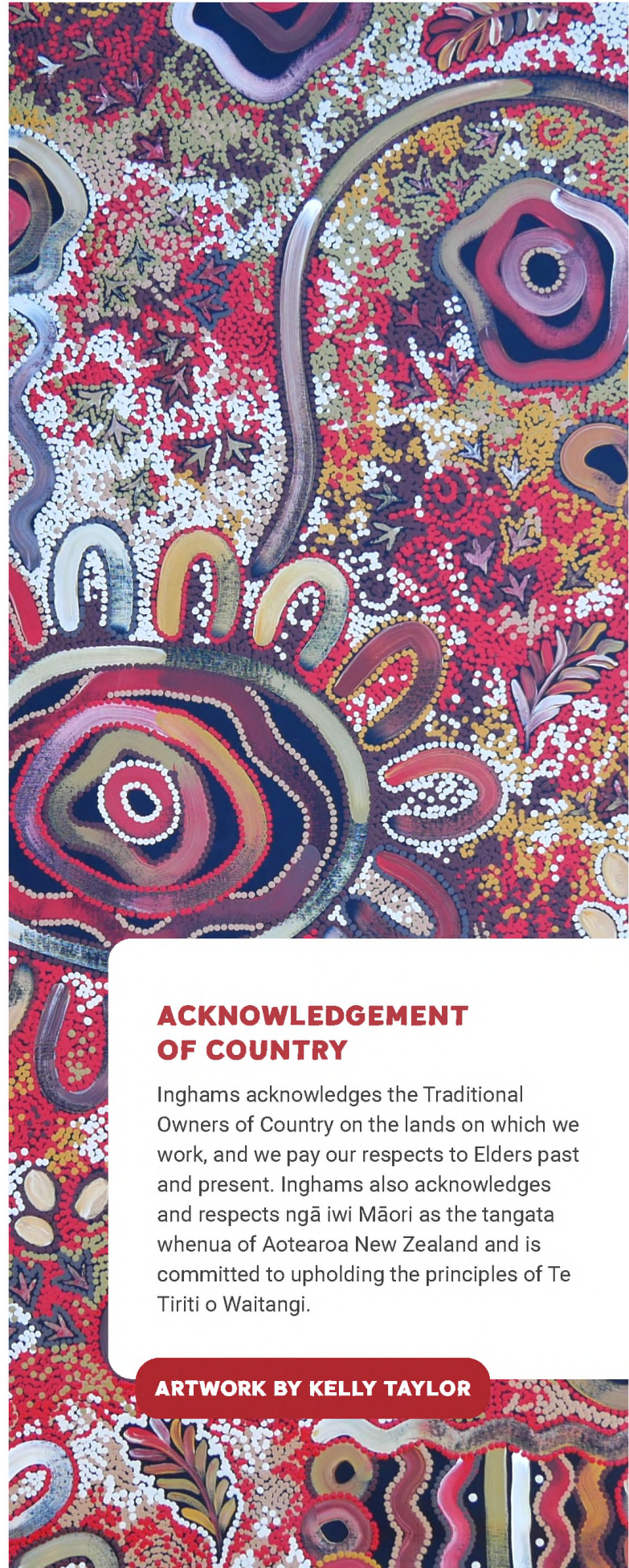
0800 003 795
inghams@hrassured.co.nz

CONSULTATION

This Statement has been developed through targeted consultation with Inghams' Reporting Entities (see Table 1) and other selected subsidiaries and operating companies across Australia and New Zealand.

Members of Inghams Modern Slavery Working Group (comprised of representatives from Sustainability, Legal, Procurement, People and Performance, and Risk functions) from across Inghams and its Reporting Entities engaged with the relevant business units and the Inghams' Board of Directors on key topics including our obligations in accordance with the *Modern Slavery Act 2018* (Cth), progress against key actions throughout the reporting period and to seek feedback on the matters contained within this Statement. Whilst not a Reporting Entity, representatives from Bostock Brothers Limited ('BBL') New Zealand were consulted in relation to the matters outline in this Statement given its acquisition in FY25.

Inghams' Executive Leadership Team also reviewed the final Statement prior to Board approval and publication.



ACKNOWLEDGEMENT OF COUNTRY

Inghams acknowledges the Traditional Owners of Country on the lands on which we work, and we pay our respects to Elders past and present. Inghams also acknowledges and respects ngā iwi Māori as the tangata whenua of Aotearoa New Zealand and is committed to upholding the principles of Te Tiriti o Waitangi.

ARTWORK BY KELLY TAYLOR

INTRODUCTION FROM CHIEF EXECUTIVE OFFICER AND MANAGING DIRECTOR



Inghams is committed to respecting human rights, including the right to freedom from modern slavery. We recognise that the responsibility to identify, address, and prevent human rights and modern slavery risks extends across our operations and supply chain. Whilst no instances of modern slavery were identified in FY25, we acknowledge that the absence of reports or identified cases of modern slavery does not remove the risks. During this reporting period, we strengthened our approach to managing potential risks by formalising our supplier due diligence framework, enhancing visa and working rights verification across our workforce, and updating supplier pre-qualification requirements.

We remain committed to improving our risk assessment and training processes to ensure that modern slavery awareness and prevention are embedded across all areas of our business. Our values of Care, Courage, Curiosity and Commitment guide our actions and underpin the ethical and professional behaviours we expect from our people, partners and suppliers.

This Statement is made pursuant to Australia's *Modern Slavery Act 2018* (Cth) and was approved by the Board of Inghams Group Limited on 10 December 2025, on behalf of all controlled entities covered by this Statement.

A handwritten signature in black ink, appearing to read 'Ed Alexander'.

Ed Alexander

Chief Executive Officer and Managing Director
Inghams Group Limited

1. ABOUT THIS STATEMENT

This Modern Slavery Statement ('Statement') is made in accordance with the *Modern Slavery Act 2018* (Cth) ('the Act') and describes the steps taken by Inghams and its reporting entities during the financial year ended 28 June 2025 to mitigate the risk of modern slavery in their operations and supply chains across Australia and New Zealand. This is a joint Statement made in accordance with section 14 of the Act by Inghams Group Limited (hereafter 'Inghams Group') and covers its subsidiaries as set out in Table 1 (each a 'Reporting Entity' in accordance with section 5 of the Act).

Whilst not all companies within the Inghams Group are Reporting Entities, Inghams takes a consolidated, whole-of-group approach to its obligations to identifying and addressing human rights risks, including modern slavery. Accordingly, this Statement addresses the actions taken by all entities within the Inghams Group, unless otherwise indicated.

This Statement is available on our website (www.inghams.com.au) and has been submitted to the Australian Government online central register.

This Statement forms part of our overall corporate governance and sustainability reporting. More information about our approach can be found in our 2030 Sustainability Leadership Roadmap, Sustainability highlights and Sustainability Data Book on our website.

1.1 IDENTIFICATION OF THE REPORTING ENTITY

Inghams Group is an Australian publicly listed company on the Australian Securities Exchange (ASX Code: ING), headquartered at Level 4, 1 Julius Avenue, North Ryde, NSW 2113, Australia. Inghams Group is the parent company of several wholly owned subsidiaries located across Australia and New Zealand with reporting entities set out in Table 1.

1.2 APPROVAL BY PRINCIPAL GOVERNING BODY

This Statement was approved by the Inghams Group Limited Board on 10 December 2025, including the Chief Executive Officer and Managing Director and Chief Financial and Commercial Officer who also hold Directorships of each of the wholly owned subsidiaries listed in Table 1.

The Chief Executive Officer and Managing Director, the Chief Financial and Commercial Officer, and the Executive Leadership Team are responsible for managing each of the Inghams Reporting Entities and have been consulted on and have considered and approved this Statement.

CONTACT

Investor queries: investorrelations@inghams.com.au
 Modern Slavery Statement or Sustainability queries: sustainability@inghams.com.au

Table 1 Reporting Entities – Inghams Group Limited Modern Slavery Statement

Reporting Entity	ACN	Location
1. Inghams Group Limited	ACN 162 709 506	*Australia
2. Ingham Holdings II Pty Limited	ACN 162 709 579	*Australia
3. Ingham Holdings III Pty Limited	ACN 162 709 659	*Australia
4. Adams Bidco Pty Limited	ACN 162 707 904	*Australia
5. Ingham Enterprises Pty Limited	ACN 130 793 609	*Australia
6. Inghams Enterprises Pty. Limited	ACN 008 447 345	*Australia
7. Inghams Enterprises (NZ) Pty Limited	ACN 003 853 558	**New Zealand / Australia

* All operations in Australia. Registered office and Level 4 / 1 Julius Avenue, North Ryde, Sydney NSW 2113, Australia.

** Australian incorporated entity with operations in New Zealand. Registered Office at 624 Waiheke Road, RD1, Waitoa, 3380, New Zealand.



WE SELL OUR POULTRY PRODUCTS TO RETAIL CUSTOMERS, QUICK SERVICE RESTAURANTS, FOODSERVICE DISTRIBUTORS, WHOLESALE AND EXPORT CHANNELS.

2. INGHAMS' OPERATIONS AND SUPPLY CHAINS

2.1 COMPANY OVERVIEW

As a large integrated poultry producer across Australia and New Zealand, we're committed to our purpose of providing deliciously good food in the best way and our ambition to be our customers' first choice for poultry.

Our products include chicken, turkey and plant-based protein products, and we're one of the largest producers of stockfeed in Australia.

We rely on a network of approximately 8,000 employees across Australia and New Zealand who work together to deliver the best quality food and service to our customers across retail, quick service restaurants, foodservice distributors, wholesale and export channels.

Our commitment to being 'Always Good' is backed by our sustainability and animal health and welfare leadership as the first poultry producer to have 100% of our free range and barn raised broiler farms RSPCA Approved in Australia and SPCA Certified in New Zealand.

Inghams' approach to identifying, managing and mitigating risks of modern slavery in our operations and supply chain is informed by our values - care, courage, commitment and curiosity. Inghams bring these values to life through our commitment to be a **good place to work**.



**LARGE INTEGRATED POULTRY
PRODUCER ACROSS AUSTRALIA
AND NEW ZEALAND**



**GEOGRAPHICALLY
DIVERSE NETWORK**



**LISTED ON THE
ASX IN 2016**



**WE EMPLOY
APPROXIMATELY 8,000 PEOPLE**



FACILITIES/FARMS



Farms



Further
Processing



Protein
Conversion Plant



Primary
Processing



Hatcheries



Warehouse
and Distribution



Feedmills

2.2 OUR OPERATIONS

Our geographically diversified network of facilities and farms across Australia and New Zealand is designed to optimise national supply chains, minimise agricultural and biosecurity risks and provide flexibility and resilience to deliver continuity of supply to customers.

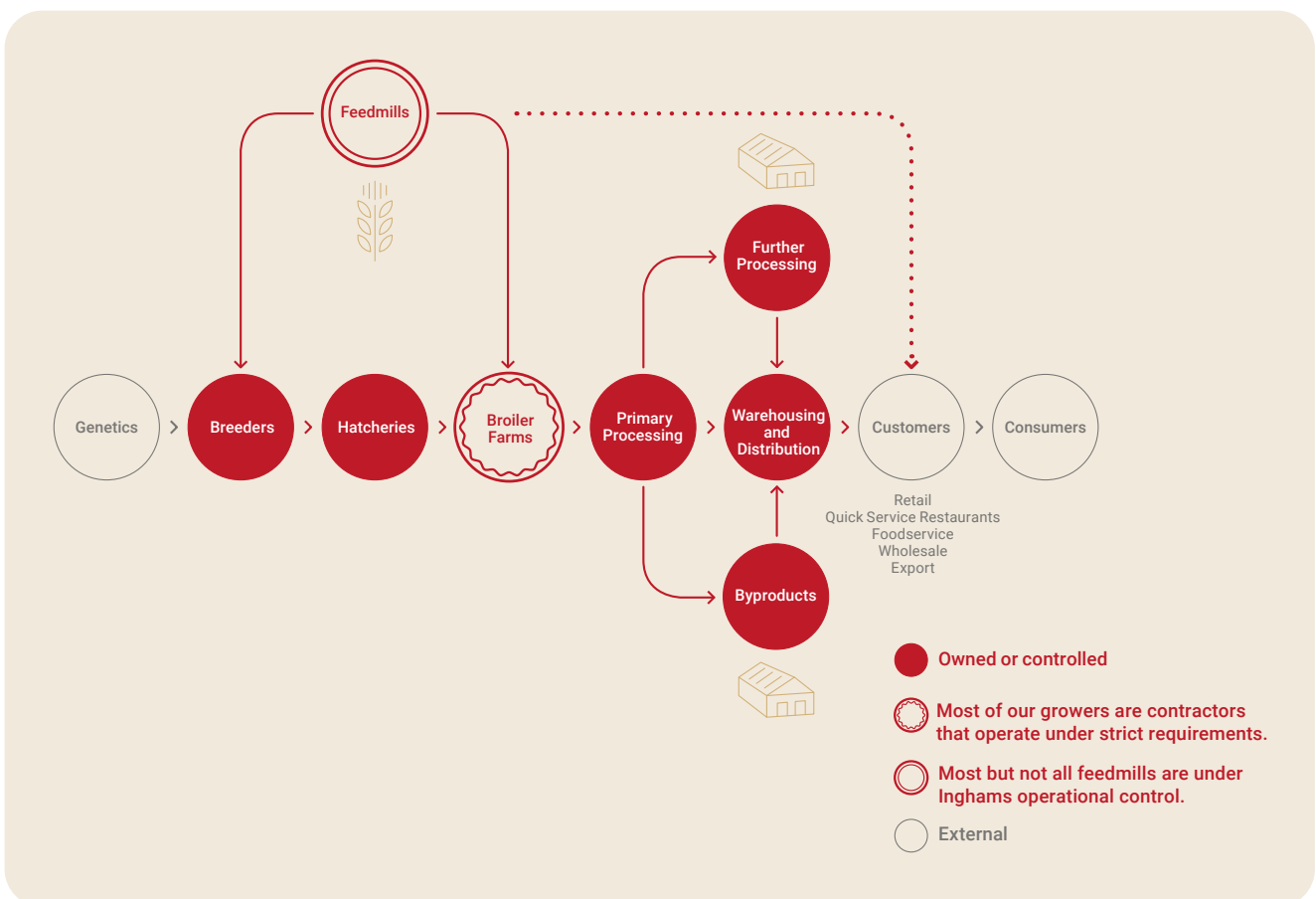
Our scale and operations span the entire value chain from farming to processing and distribution. Our poultry supply chains are vertically integrated within the business.

Our key operations are:

Farming	Includes breeder farms for fertile egg production as well as hatcheries and broiler farms (independent contractors) for the growing of meat chickens.
Feed Milling	Production of stockfeed, the majority of which is for internal use in Inghams poultry business, with sales to other customers in the poultry, pork and dairy sectors.
Poultry Processing	Primary and further processing of chickens and turkeys into products for sale to major retail customers, quick service restaurants, food service and wholesale customers.
Distribution	Warehousing and distribution of poultry products to customers.

A key part of our value chain is the network of broiler farms that grow our birds. These growers are contractors that operate in accordance with strict guidance, including animal health and welfare, feed regime and worker condition requirements.

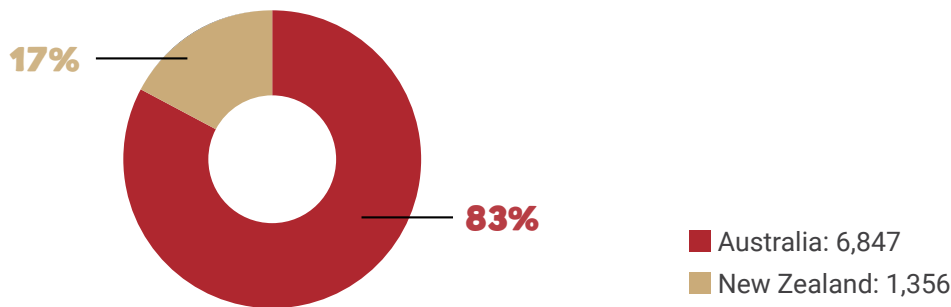
Our website (www.inghams.com.au) provides information on our company, purpose and products. Additional information about our operations and products in New Zealand can be found at www.inghams.co.nz and www.waitoafreerange.co.nz.



2.3 OUR EMPLOYEES

The distribution of Inghams employees across Australia and New Zealand is shown in Figure 1.

Figure 1: Distribution of Employees by Country¹



¹ Data effective 30 June 2025

A snapshot of our workforce by function and employment type is shown in Table 2. The employment type is included as this may be an indicator of the level of vulnerability of the employees.

Table 2: Workforce by Function and Employment Type

Function / Employment Type	Full Time	Part Time	Casual	% Under Enterprise Bargaining Agreement (EBA)
Agribusiness	174	5	20	78%
Farming	460	34	410	89%
Primary processing	3,499	180	898	96%
Further processing	784	91	200	95%
Supply chain	672	38	282	94%
Sales and marketing	140	0	0	10%
Corporate support	296	15	5	2%

A snapshot of our workforce by function and employment type is shown in Figures 2 and 3. The employment type is included as this may be an indicator of the level of vulnerability of the employees.

Figure 2: Gender Representation - Total Workforce

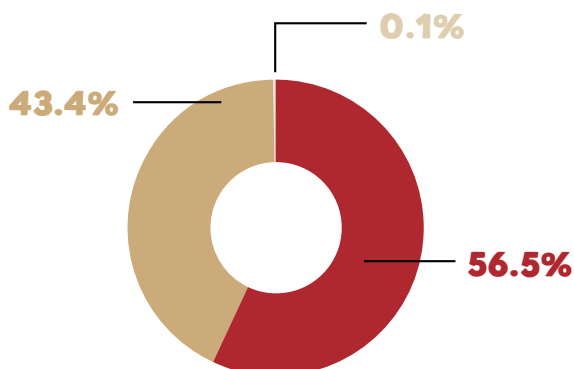
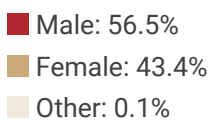
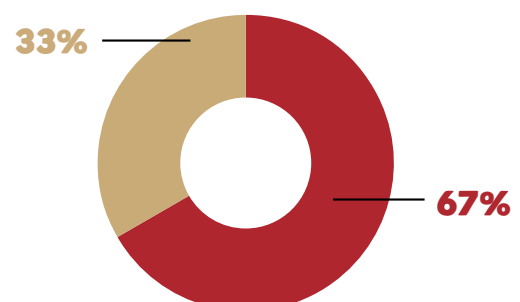
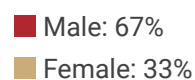


Figure 3: Gender Representation in Management (Organisational Leadership Team)



2.4 OUR SUPPLY CHAINS

Inghams Direct (Tier 1) Suppliers

In FY25, Inghams sourced goods and services from approximately 4,600 direct suppliers (Tier 1²). Of these, approximately 1,200 are suppliers with more than A\$100,000 in spend.

The majority of Tier 1 suppliers are based in Australia and New Zealand, with less than 1% located in other regions such as America, Europe, Asia and Africa.³

Figure 4: Inghams FY25 Tier 1 Spend by Country (%)

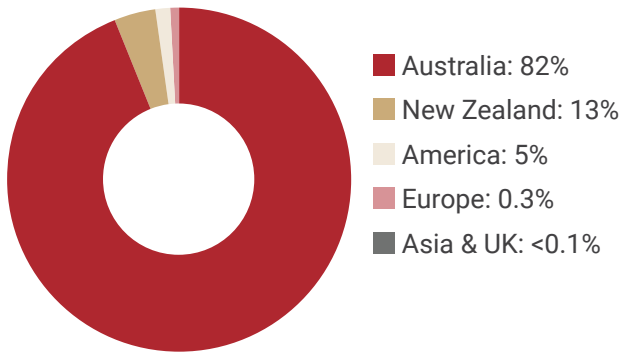
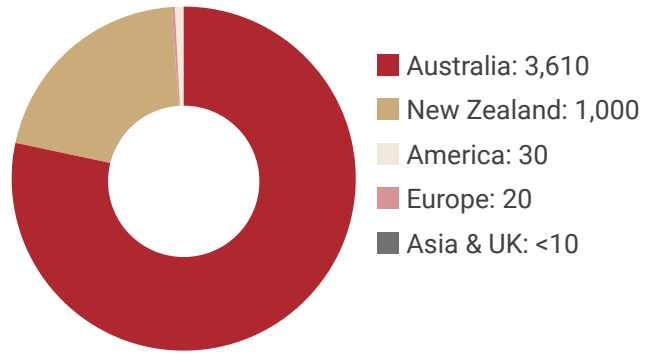
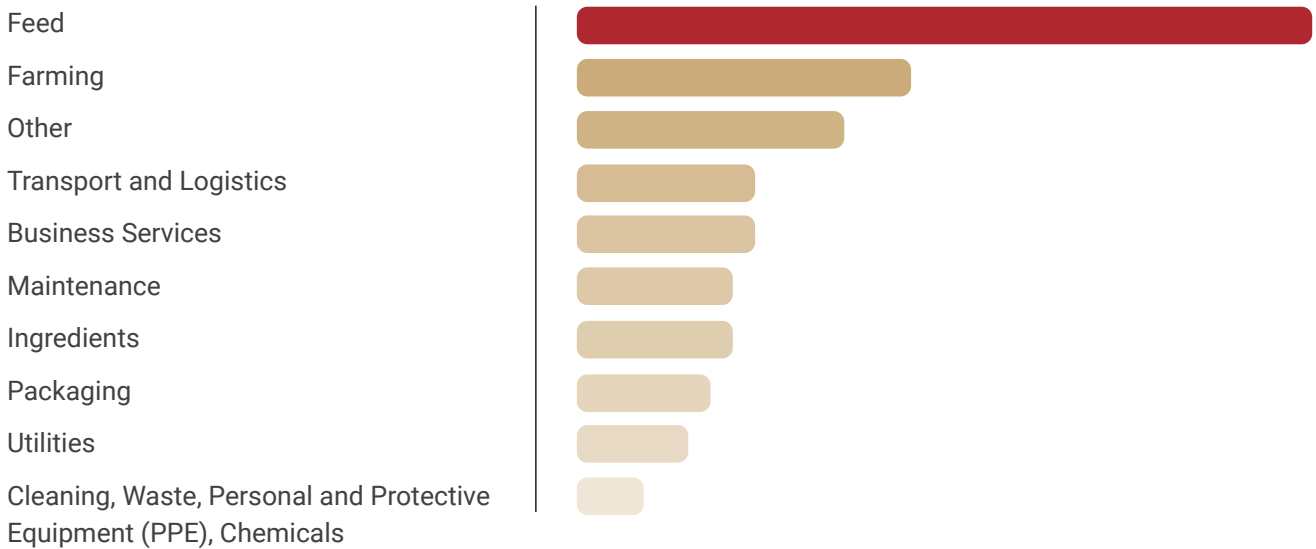


Figure 5: Inghams FY25 Tier 1 Number of Suppliers⁴ by Country



A summary of Inghams' FY25 Tier 1 spend by category is outlined in Figure 6.

Figure 6: Inghams Direct Spend (Tier 1) Top 10 by Category FY25



² Tier 1 Suppliers: These are direct suppliers of the final product or service.
 Tier 2 suppliers: These are suppliers or subcontractors to Tier 1 suppliers.
 Tier 3 suppliers: These are suppliers or subcontractors to Tier 2 suppliers.

³ The Tier 1 country data has been collected from Inghams payment platform, based on the currency in which payments are made.

⁴ Rounded to nearest 10 as at end FY25

Inghams Indirect (Tier 2) Suppliers

Inghams acknowledges that modern slavery risks often sit within multi-tiered global supply chains and as such, we continue to develop greater visibility into our Tier 2 supply chain through investments in supply chain assessment technology and targeted supplier engagement frameworks.

While most of our Tier 1 suppliers are based in Australia and New Zealand, we acknowledge their role as essential partners in leveraging the global market through the sourcing of goods and services from suppliers overseas. Of our Tier 2 supplier base over which we have visibility, the majority are based in Australia, the USA, the United Kingdom, India and China, with the remainder spread across Asia, South America, Europe and Canada. Our Tier 2 suppliers are largely based in software and IT, professional, scientific and technical services, chemical manufacturing, non-durable goods, food manufacturing, publishing, and computer and electronic product manufacturing.

Figure 7: Number of Tier 2 Vendors by Country⁵

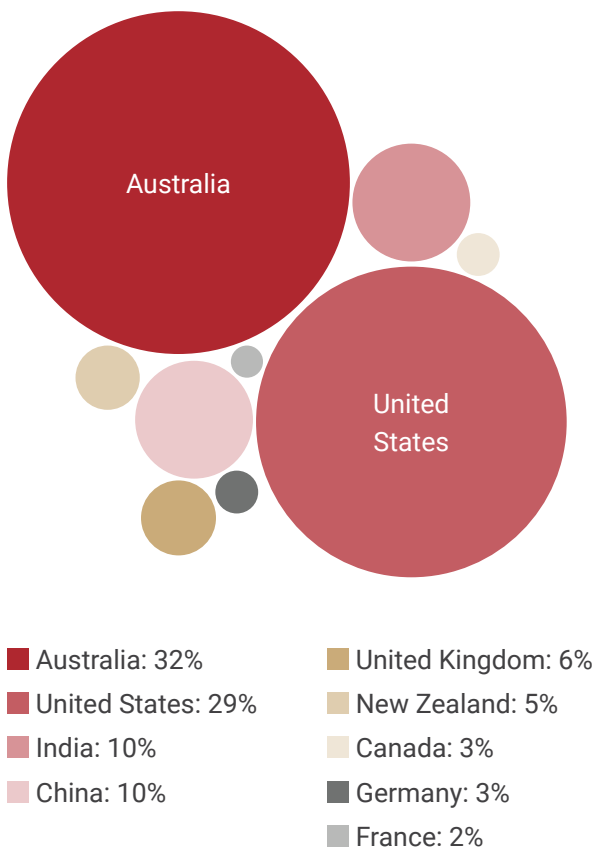
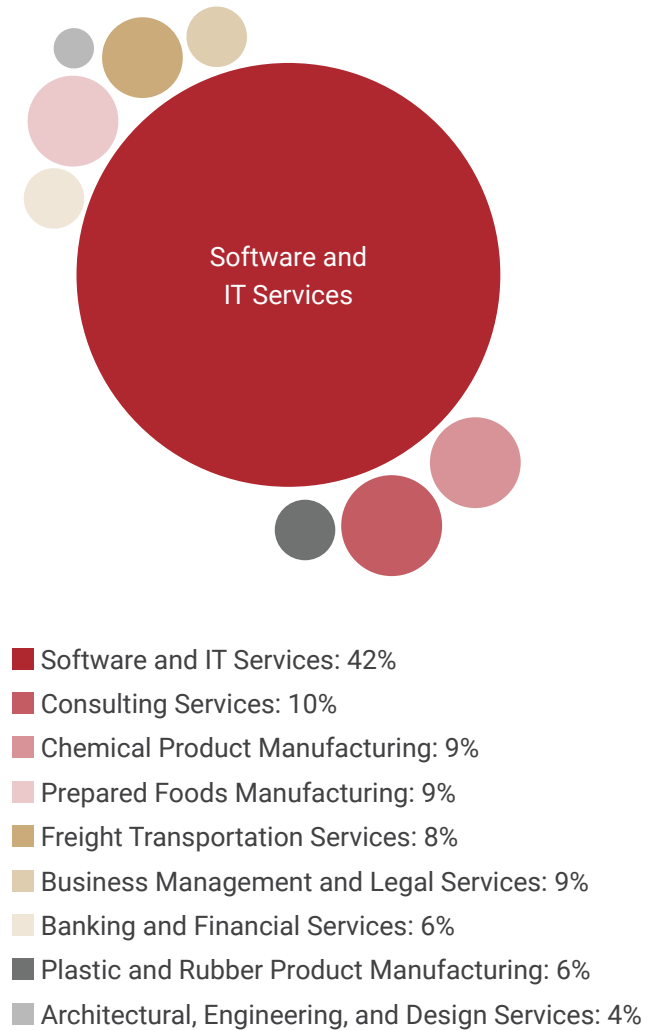


Figure 8: The Concentration of Tier 2 Suppliers by Industry⁶



⁵ Tier 2 vendors have been identified through data analysis described in section 3.1. Where Tier 2 vendors were listed as unknown country, these are not reported.
⁶ Tier 2 suppliers have been identified through data analysis described in section 3.1. Where Tier 2 suppliers were categorised as 'unknown', these have not been reported.

3. DESCRIPTION OF MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

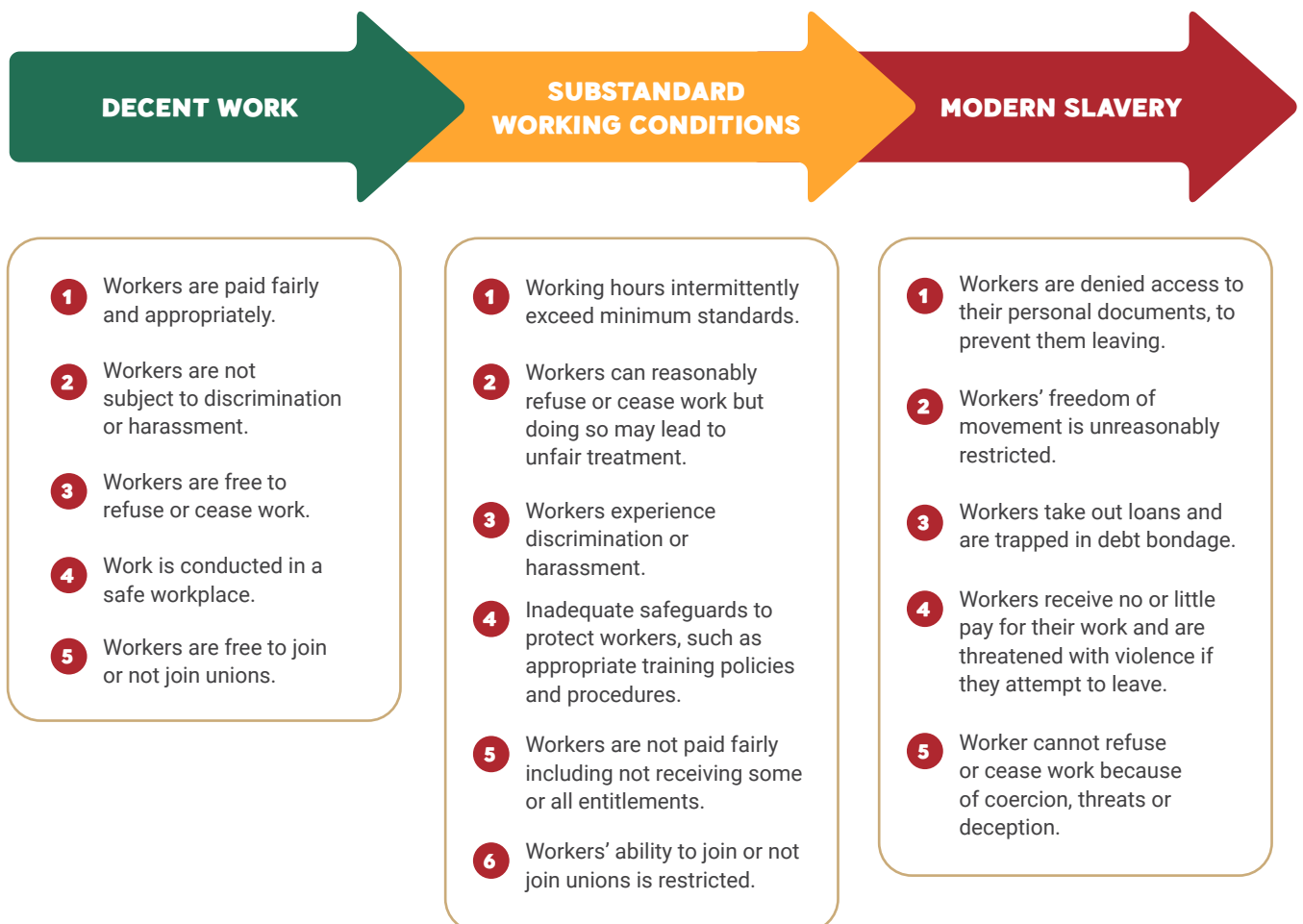
3.1 RISK ASSESSMENT APPROACH

The Spectrum of Exploitation

Modern slavery is a term that describes a wide spectrum of situations involving various forms of exploitative practices. The *Modern Slavery Act 2018* (Cth) defines modern slavery as exploitative practices such as trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Modern slavery occurs at the most serious end of the labour exploitation continuum and is often preceded or accompanied by substandard working conditions. It is important to understand that these practices exist on a continuum and may manifest in varied forms and levels of seriousness across the supply chain, as shown in Table 3 'Spectrum of Exploitation' below.

Table 3: Inghams is Committed to Supporting Workers' Rights Across the Spectrum of Exploitation



7 Commonwealth Modern Slavery Action 2018 Guidance for Reporting Entities May 2023

Risk Assessment Process

We assess inherent modern slavery risks within our operations and supply chain through a structured, four-step process. This approach draws on recognised global data sources, technology platforms and internal insights to identify where people may be most vulnerable to exploitation.

STEP 1	IDENTIFY SECTOR AND GEOGRAPHIC RISK	We review credible databases and indexes to understand where modern slavery risks are more likely to occur based on geography and industry. These include the Global Slavery Index (GSI), Global Rights Index, the US Department of Labor’s List of Goods Produced by Child and Forced Labour, and the International Labour Organization (ILO) indicators. These sources help us identify countries, sectors and commodities with elevated inherent risks.
STEP 2	ASSESS OUR SUPPLY CHAIN EXPOSURE	We use Supply Chain Resilience platform Interos to assess our Tier 1 and Tier 2 suppliers through targeted mapping of exposure to modern slavery. Indicators considered include weak governance, political instability and labour-rights protections. The Interos technology provides us with enhanced visibility across our extended supply chain and supports our prioritisation of higher-risk suppliers categories.
STEP 3	LEVERAGE OUR INTERNAL INSIGHTS	We integrate findings from supplier audits, risk assessments, whistleblower reports, and customer feedback to identify areas where vulnerabilities may exist within our operations and supply chain. Labour-intensive and subcontracted categories, seasonal or migrant workforces, and suppliers operating in higher-risk regions are prioritised for review and engagement.
STEP 4	DETERMINE OUR RELATIONSHIP TO RISK	In line with the UN Guiding Principles on Business and Human Rights (UNGPs), we apply the UNGPs guidance ⁸ to assess whether we may cause, contribute to, or be directly linked to modern slavery through our business activities and relationships. This assessment informs how we prioritise suppliers for engagement, capacity-building and audit, and guides our remediation and continuous-improvement activities. For example, labour hire companies have been prioritised for independent audits given their engagement to supplement labour in our operations.

We apply the following definitions, in line with the UNGPs continuum of involvement to understand our potential relationship to our inherent risks:

Cause	A business may cause modern slavery when its activities (including omissions) directly result in modern slavery occurring. For example, by failing to pay or provide appropriate safety protection for our employees.
Contribute	A business may contribute to modern slavery when its actions (or omissions) increase the likelihood of modern slavery occurring, even if the harm was carried out by a third party. For example, where labour hire companies that work within our operations cause the harm but are engaged directly by Inghams’.
Directly Linked	A business could be directly linked to modern slavery where it has a business relationship with an entity that causes or contributes to modern slavery. For example, through the purchase of goods or services manufactured within our extended supply chain in a high-risk jurisdiction, but over which Inghams has limited visibility or control.

⁸ In our key risk areas we have sought to define our relationship to risk against the UNGP continuum of “Cause”, “Contribute”, “Directly Linked”

3.2 RISKS IN OUR OPERATIONS

We consider the risk of modern slavery within our direct operations to be low as our operations are concentrated in Australia and New Zealand, where robust employment laws and regulatory oversight provide strong safeguards against modern slavery. The majority of our workforce is directly employed, with 96% of Australian employees covered by an Enterprise Bargaining Agreements (EBAs) approved by the Fair Work Commission (FWC). These agreements provide wages and conditions above the legal minimum, including provisions for leave, overtime, and redundancy.

In New Zealand, collective employment agreements approved by the relevant trade unions set out minimum entitlements for wages, hours of work, leave, and other benefits. Where employees are not covered by collective agreements, they are engaged under the relevant award on above-award wages (Australia) or individual employment agreements or common law contracts, as appropriate to their role (New Zealand).

All employment practices comply with the National Employment Standards in Australia and the Employment Relations Act in New Zealand and are supported by internal policies providing additional benefits such as paid parental leave.

Comprehensive recruitment and rostering controls further mitigate risk, including mandatory visa and working rights verification and system integrations that prevent employees being rostered outside their visa conditions. These measures ensure our people are employed lawfully, ethically, and in accordance with applicable local standards.

Supplementary Labour Hire in our Operations

We recognise, however that our engagement of labour hire firms in Australia to provide supplementary, indirect labour in areas such as cleaning, security, transport, and farming operations is where modern slavery risks are most likely to occur. Although labour hire makes up between just 2-4% of the Inghams Australian direct workforce, we recognise the heightened risk associated with this particular business model. To address this, we include specific requirements within our supplier contracts for suppliers to take reasonable steps to ensure that there is no modern slavery in their supply chain, cooperate with periodic audits and notify Inghams immediately if they become aware of any actual or suspected instances of modern slavery in their operations or supply chain. During FY25, we continued to strengthen the governance and compliance requirements of labour hire providers, including reviewing our preferred supplier list and re-contracting with selected suppliers post tender evaluation process.

3.3 RISKS IN OUR SUPPLY CHAINS

Whilst Inghams sources products and services from predominantly Australian and New Zealand suppliers that range from small independent farmers to large multi-national corporations, we are aware that many of these suppliers source goods and services from overseas, multi-tiered supply chains exposed to modern slavery risks. For example, although our procurement includes significant spend on soy meal and major plant and equipment purchased from Australian based suppliers, we are aware that these products are sourced from overseas.



Table 4 below summarises the priority risk categories identified through our inherent risk identification processes within our supply chain, risk indicators and our potential relationship to the risk⁸.

Table 4: Inghams Priority Risk Areas

Risk Area	Specific Modern Slavery Risks	Potential Risk Categories Identified by Published Sources	Key Risk Factors	Our Potential Relationship to the Risk
Labour and service providers in our Australian & New Zealand supply chains	<ul style="list-style-type: none"> • Exploitation of temporary or migrant workers in contract farming, processing or logistics roles • Underpayment, excessive hours or debt bondage in outsourced labour-hire or cleaning services • Recruitment through unlicensed or informal labour-hire channels • Coercion or restriction of movement for visa-dependent workers 	<ul style="list-style-type: none"> • Cleaning and laundry services⁹ • Labour hire¹⁰ • Security¹⁶ • Contracted Broiler farms¹¹ • Maintenance services¹² • Transport 	<ul style="list-style-type: none"> • Reliance on lower skilled labour/low barrier to entry of work • Reliance on temporary or migrant workers • High levels of subcontracting 	Contribute or Directly linked
Sourcing of raw material ingredients for feed and products	<ul style="list-style-type: none"> • Forced or child labour in the cultivation or processing of soy, palm derivatives or grain by-products in high-risk jurisdictions • Exploitation in fishing or aquaculture feed supply chains • Forced labour or trafficking in international shipping or port services • Poor / unsafe working conditions in ingredient processing industries 	<p>Risk ingredients may include:</p> <ul style="list-style-type: none"> • Soy meal and other feed ingredients sourced from overseas²⁰ • International shipping¹³ • Other chicken feed ingredients from Australia¹⁴ • Sourcing of ingredients for our products, such as flavourings or salt¹⁵ 	<ul style="list-style-type: none"> • Reliance on lower skilled labour • Potential links to higher-risk geographies • Complex and fast-moving supply chains • Use of third-party recruitment • International shipping has risk factors including isolation of workers 	Directly linked
Sourcing of goods not for resale but for use in operations	<ul style="list-style-type: none"> • Forced or child labour in garment and textile manufacturing for uniforms • Exploitative labour or unsafe conditions in PPE, electronics or chemical supply chains • Trafficking or forced labour (including state-sponsored forced labour) in the production of solar panels, components or raw materials (e.g. polysilicon) • Debt bondage or trafficking in freight or packaging supply chains (pallets, plastics) 	<ul style="list-style-type: none"> • Uniforms¹⁶ • Personal Protective Equipment (PPE)¹⁷ • Information Technology hardware and solar panels¹⁸ • Chemicals • Pallets¹⁹ 	<ul style="list-style-type: none"> • Reliance on temporary or migrant workers • Potential links to high-risk geographies • Complex and fast-moving supply chains • Use of third party recruitment 	Directly linked

⁹ Australian Human Rights commission: Cleaning and laundry services are considered high risk due to both high number of past violations. Global Slavery Index (Australia): Cleaning is listed as a high-risk industry in Australia

¹⁰ KPMG: Labour hire and security has a history of exploitative labour practices

¹¹ Global Slavery Index (Australia): due to Global Slavery Index noting agriculture as a risk industry for forced labour

¹² Australian Institute for Criminology: Maintenance services are linked to construction which has been identified as a risk sector. Australian Human Rights Commission: Property, Construction and Modern Slavery (2020)

¹³ Guide to Minimising Modern Slavery Risk in Shipping Supply Chains- Mekong Club, 2023

¹⁴ Global Slavery Index, ILO Agriculture sector is considered a risk industry in Australia and globally

¹⁵ Global Slavery Index, List of Goods Produced by Child Labor or Forced Labor, US Dept. of Labor (2024)

¹⁶ Global Slavery Index

¹⁷ Business and Human Rights Resource Centre 2018

¹⁸ List of Goods Produced by Child Labor or Forced Labor, US Dept. of Labor (2024). Over-Exposed: Uyghur Region Exposure Assessment for Solar Panels July 2023 Sheffield Hallam University

¹⁹ The location of timber sourced for pallets can include countries at risk of modern slavery https://www.brambles.com/Content/cms/pdf/2024_Brambles_Modern_Slavery_Statement_2024.pdf

4. GOVERNANCE FRAMEWORK

Our work to prevent and address modern slavery risks is supported by a commitment to strong governance practices. The governance structure outlined below supports all entities owned and controlled by the Group and covered by this Statement.



INGHAMS BOARD

Provides strategic direction and oversees effective management and performance at Inghams.
Approves Inghams' Modern Slavery Statement.

RISK AND SUSTAINABILITY COMMITTEE (RSC)

The RSC supports the Board to oversee the implementation and effectiveness of Inghams' risk, compliance and safety frameworks. The Inghams Board delegates authority to the RSC to support and advise in the oversight of risk, compliance and safety matters, including our approach to modern slavery and human rights issues.

PEOPLE AND REMUNERATION COMMITTEE (PRC)

The PRC supports the Board to develop policies and governance to support our people. The Inghams Board delegates authority to the PRC to develop and review people and remuneration approaches, policies and systems of work for the Group with respect to legal and regulatory compliance, and appropriate ethical standards, as they relate to people.

EXECUTIVE LEADERSHIP TEAM (ELT)

The ELT is responsible for the management of Inghams and executing strategic objectives. The ELT Risk, Assurance and Compliance (RAC) Committee oversees Inghams' core corporate functions including risk, compliance, safety, sustainability, ESG and procurement. The RAC has oversight of any actions to assess and manage modern slavery and human rights issues.

MODERN SLAVERY WORKING GROUP (MSWG)

The MSWG is a cross-functional and multi-jurisdictional group including representatives from the business units of Procurement, People and Performance, Legal, Risk, and Sustainability who are responsible for developing and implementing policies, practices and reporting on modern slavery across our operations and supply chain. The working group meets quarterly.

Progress of our modern slavery activities is reported when required to the RSC.

FUNCTIONS AND OPERATIONS

General Managers of operations and functions are responsible for implementing the Modern Slavery commitments in their business area.

PROCUREMENT TEAM

The Procurement team reports to the Chief Financial & Commercial Officer and coordinates the MSWG and Statement.

SITE LEVEL

Site management and employees are responsible for implementing strategies, policies and commitments relating to Modern Slavery.

4.1 POLICIES AND PROCEDURES

The policies listed below function to support workers in our operations and codify our position on responsible sourcing. Our policies are hosted on a web platform which allows them to be translated into the key languages spoken by our people.

Policies	Link to Modern Slavery and Decent Work
Code of Conduct	Outlines expected employee behaviour and business conduct, including legal compliance and ethical standards.
Social Accountability Policy	Ensures socially responsible business practices, prohibiting forced labour, child labour, corruption, bullying, harassment, and discrimination. It commits Inghams to be an equal opportunity employer, adopting practices to ensure that we operate in a way that promotes social standards that support our people, the environment and the community.
Recruitment and Selection Policy	Outlines a merit-based approach to recruitment and promotions and outlines recruitment standards that are consistent, appropriate and free from discrimination or bias.
Child Labour Policy	Prohibits child labour in all operations across Australia and New Zealand. The employment of any person under the age of 18 years also requires approval from senior leadership, including consideration of safe work practices and facilitating participation in education.
Domestic and Family Violence Leave Policy	Provides support and leave for employees affected by domestic or family violence.
Discrimination, Harassment and Bullying Policy	Commits to a fair and respectful workplace, free from discrimination, harassment, sexual harassment and bullying.
Inclusion, Equity and Diversity Policy	Commits to equality, providing a place of work that recognises an inclusive and diverse environment, and demonstrates our commitment to a fair place to work that upholds human rights.
Grievance Procedure	Provides a process for employees to address concerns about unfair or disrespectful treatment. It explains the informal and formal processes to resolve a grievance and clarifies leaders' responsibility to act upon grievances and to support our people.
Whistleblower Policy	Encourages reporting of misconduct including breaches of legislation, criminal activity and unethical behaviour. Reporting can be anonymous to an externally and independently managed hotline.
Work Health, Safety and Injury Management Policy	Commits to providing a safe, healthy workplace, safe equipment, safe systems and training to undertake safe behaviours. Inghams recognises its duty of care to ensure the health, safety, and welfare of employees and all others impacted by our operations. This includes the management of psychosocial risks.
Purchasing and Procurement Policy	Outlines procurement and purchasing practices, including supplier code of conduct and whistleblower policy.
Supplier Code of Conduct	Details social, environmental, and ethical requirements for suppliers. Our Code of Conduct covers, but is not limited to, labour practices, human rights, business integrity and environment. All new suppliers with a projected spend greater than \$250,000 per annum are requested to sign up to the Inghams' Supplier Code of Conduct including the Modern Slavery Supplier Commitments.

4.2 A GOOD PLACE TO WORK: RECRUITMENT AND WORKING CONDITIONS.

Inghams' recruitment and working conditions are driven by our values and our commitment to ensure that Inghams is a good place to work.

Recruitment

Inghams' recruitment team is managed centrally to ensure standard procedures and employment contracts are employed across Australia and New Zealand. We conduct work rights and visa status checks prior to employment which includes verification with the Department of Home Affairs for Australian employees who are not citizens or permanent residents. In New Zealand visas are sighted.

In FY24, Inghams implemented a new system to validate employee's right to work and visa status. This process confirms working rights for all new employees prior to employment as well as performing ongoing checks for existing workers to ensure compliance. The visa verification system is integrated to our time and attendance system meaning employees can only be rostered in accordance with their visa conditions.

Freedom of Association and Collective Bargaining

Inghams has 34 enterprise agreements (EA) in Australia and five collective agreements (CA) in New Zealand, covering most of our operations. Of these agreements, all five in New Zealand and 29 in Australia have one or more unions attached as a party to the agreement. Employees have the freedom to join, or not join, a union. Where an employee elects to do so, employees may request payment of fees as a payroll deduction for union membership.

Living Income and Payment System Controls

Employees are engaged on the industry award relevant to their occupation, or an EA or CA. Hourly rates are reviewed during our annual wage review process (for employees covered by an award), or on the anniversary of the relevant agreement. The pay rates in awards are fixed by the Fair Work Commission (FWC) in Australia, and those in EAs are reviewed by the FWC upon lodgement to ensure they are better than the relevant reference award in the absence of an EA. All employees are paid electronically via direct debit in accordance with an electronic time and attendance system. We have a range of internal controls in place to prevent and detect underpayment risks, including system access and processing controls, timesheet and spot checks, segregation of duties, and regular internal reviews and audits.





4.3 CAPABILITY AND AWARENESS

Inghams provides various training programs, aimed at fostering a safe and supportive workplace. These programs promote our values, which align with our commitment to human rights, including modern slavery. These existing initiatives are foundational in building a workforce that is conscious of risks such as exploitation and unethical practices. In FY26, we will explore the introduction of modern slavery training to further strengthen our ability to identify and mitigate modern slavery risks within our operations and supply chain.

Whistleblower Training

During FY25, Inghams continued to promote its whistleblower policy through refresher training and toolbox talks, promotion of training materials and online educational videos and frontline leader training programs.

Health Safety and Wellbeing Training

During FY24, we implemented safety programs focusing on care, psychological safety and breaking complacency. Through our wellbeing program, we upskilled select people as accredited Mental Health First Aiders at 75% of our sites and piloted a psychosocial safety program in New Zealand.

Staff Development

As part of our journey to foster an inclusive and constructive culture, we have continued to invest in training programs focused on helping our people to bring their best selves to work and to develop their career potential. These training programs were noted within external Sedex Members Ethical Trade Audit (SMETA) audits as good practice examples of workforce development.

CASE STUDY: BUILDING GOVERNANCE CAPABILITY THROUGH MODERN SLAVERY TRAINING

In FY25, Inghams delivered a pilot Modern Slavery Training and Workshop for members of the Modern Slavery Working Group, facilitated by Edge Impact.

The session brought together representatives from procurement, sustainability, risk and operations to deepen shared understanding of Inghams' human rights commitments and clarify the group's role in overseeing modern slavery governance. The workshop supported participants to define how responsibilities are distributed across functions, identify the resources needed for effective implementation, and prioritise capability building across the broader business.

As a result, the Working Group strengthened alignment between business units, enhanced visibility of emerging risks in agricultural supply chains, and established a roadmap for expanding awareness and governance training in FY26.

4.4 GRIEVANCE AND REMEDIATION APPROACH

Operations: Whistleblower and Prevention of Bullying, Harassment and Discrimination

We understand and are committed to our responsibility to address grievances promptly and effectively via our Grievance Procedure and Whistleblower processes.

Our Grievance Procedure provides a process for our employees to address concerns about unfair or disrespectful treatment. It explains the informal and formal processes to resolve a grievance and clarifies leader's responsibility to act upon grievances and to support our people.

We encourage the use of our whistleblower systems to report grievances related to potential instances of modern slavery. Our Whistleblower Policy encourages reporting of misconduct including breaches of legislation, criminal activity and unethical behaviour through an externally and independently managed hotline. Reporting can be anonymous and can be accessed on our website.

FY25 Performance

Our performance in FY25 is outlined below.

- Internally reported matters including bullying, harassment, inappropriate behaviour, sexual harassment, discrimination or other misconduct saw an increase in FY25 reflecting improved reporting culture and continued psychosocial safety.
- None of the reported matters amounted to misconduct as defined in the Corporations Act or Modern Slavery Act.
- Across FY25, four complaints were made via the whistleblower process, continuing a decreasing trend.

During FY26, we aim to implement a phased roll out of a self-reporting regime where suppliers are required to report to Inghams on material matters that have been identified such as modern slavery.

Supply Chain

It is noted that no instances of modern slavery have been identified in our supply chains. Our supply chain remediation approach continues to evolve.

Where risks or actual non-compliance of other workplace relations matters are identified, we seek to work with those suppliers to rectify the issues and to improve their processes. Depending on the nature and severity of the non-compliance as outlined in Table 3 'Spectrum of Exploitation', and the supplier's willingness to engage in remedial action, we firstly seek to work with the supplier to pursue remedial action with consideration for affected parties.

This approach has been demonstrated in the remediation actions undertaken to address risks identified in the Supplier Audits conducted in FY25. Refer section 4.7.

4.5 PARTNERSHIPS

We understand that effective modern slavery risk management requires ongoing and collaborative stakeholder engagement. We engage with our supply chain partners, labour providers, customers, external experts and industry bodies and other enforcement bodies as required to continuously improve our approach to identifying and managing modern slavery risk.

To support our modern slavery approach, we also work with third-party experts, including:

SEDEX (Supplier Ethical Data Exchange)	As members of SEDEX, we work with our customers to undertake SMETA (Sedex Members Ethical Trade Audit) audits of our sites and facilities.
AUS-MEAT	A leading agribusiness auditor we engage to carry out independent audits.
Third Party Legal	Conducts supplier services audits covering employee working rights and entitlements that meet National Employment Standards, Fair Work Act and SMETA requirements.
Interos	Provides modern slavery supply chain risk insights and analysis through its technology platform to assist in the identification and management of modern slavery risks within our supply chain.
Edge Impact	Expert sustainability consultancy engaged to support the review of our Modern Slavery Statement and provide feedback on suggested areas of improvement.

4.6 RESPONSIBLE SOURCING

Actions to address modern slavery risks in our supply chain continue to evolve. Inghams' actions to ensure supplier due diligence are outlined below.

In line with our values of care and commitment, we aim to ensure that the ethical standards that apply within our own operations extend to our supply chains through targeted responsible sourcing practices.

Supplier Code of Conduct

Our Supplier Code of Conduct details the social, environmental, and ethical expectations of our suppliers and includes requirements across labour practices, human rights, business integrity and the environment, including modern slavery commitments in accordance with the *Modern Slavery Act 2018* (Cth). All new suppliers are requested to accept the Inghams' Supplier Code of Conduct as part of the onboarding and contract renewal process.

Improving Supplier Management Systems

In FY25, Inghams finalised the implementation of a supplier management system to support our supplier due diligence processes. The new system introduces a requirement for new suppliers to sign our Supplier Code of Conduct and complete our modern slavery risk assessment as part of onboarding, with suppliers deemed high risk required to complete a targeted modern slavery screening questionnaire. Any suppliers identified as high risk are then flagged for follow up with formal action plans, including the completion of supplier or category specific questionnaires. We intend to capture our existing supplier base progressively as part of the contract renewal process.

Contracts and Agreements

Our standard supply contract used for procurement of goods and/or services, includes modern slavery clauses that outline our expectations of our suppliers.

In addition, we are progressively implementing our new growing agreements that require assurances from growers in relation to working rights, including cooperating with an Inghams' or a nominated third party workplace audit covering working rights and modern slavery expectations.

For contracts related to the purchase of grain both in Australia and overseas, we include modern slavery clauses as prescribed by the Grain Trade Australia Trade rules.

4.7 AUDIT

Audits

We use a combination of internal and external audit processes to assess and strengthen our approach to managing modern slavery risks. Our internal audit function undertakes periodic reviews of governance controls, which can include those related to labour practices and ethical conduct across our operations.

Externally, we participate in the Sedex Members Ethical Trade Audit (SMETA) program through our membership of Sedex (Supplier Ethical Data Exchange). SMETA is an internationally recognised social auditing methodology that evaluates workplace standards, including labour conditions, health and safety, environmental performance, and business ethics. It is designed to identify and address issues such as unsafe working conditions, excessive hours, discrimination, low pay, and forced labour.

We undergo independent third-party SMETA audits across our primary and further processing sites and share the results with our customers to demonstrate transparency and continuous improvement.

In addition, we undertake separate labour and sustainability audits on behalf of major customers, to provide further assurance that ethical and lawful employment practices are upheld throughout our operations and supply chain.

Supplier Audits

We also conduct targeted audits in labour-intensive and higher-risk supplier categories to better understand and address working conditions within our supply chain. These audits are selected through our Supplier Social Accountability Audit Framework which defines how suppliers are prioritised and assessed.

Our approach is based on a principle of 'trust but verify' which means we work collaboratively with suppliers to identify and resolve non-conformances, support continuous improvement, and protect workers' rights and welfare, rather than taking immediate punitive measures.

Audits are undertaken by an external employment law firm using the SMETA criteria, which assess key labour standards including workplace management, child and forced labour, and hours of work. Findings are used to drive corrective actions and strengthen supplier practices over time.

FY25 Performance

During FY25, SMETA audits took place at four of our sites including select labour hire or third-party providers. Whilst the audits did not identify any instances of modern slavery, they did reveal minor non-conformances with a labour hire service agreement and a lack of a living wage benchmark analysis. Where risks or actual non-compliances were identified, we worked and continue to work with the relevant suppliers to rectify and improve their processes. The audit also identified good processes related to our diversity, reward and recognition programs and safe hygienic working conditions.

FY25 Audit outcomes

During FY25, we continued our program of proactive audits of third-party labour suppliers in higher risk industries to identify serious non-compliance, potential non-compliance or potential improvements to attain best practice. Four audits were completed in FY25 across our transport and broiler farming operations. Potential non-compliances with labour standards were identified (including potential breaches of employment record and payslip requirements), as detailed in Table 5 below. The audits completed during FY25 did not identify any instances of modern slavery. All identified risks or observations were resolved to a satisfactory level in conjunction with the relevant supplier.

Table 5: FY25 Social Accountability Supplier Audit Outcomes²⁰

Category of Risk Observation:	Category 1: Risk of serious non-compliance with labour standards identified in the audit	Category 2: Risk of potential non-compliance with labour standards identified in the audit	Category 3: Compliant and/or Recommendations	Status of Risk
Supplier Category				
Grower 1	No	Clarification and further information sought.	No	Addressed and completed
Grower 2	No	Clarification and further information sought.	No	Addressed and completed
Transport 1	Clarification and further information sought	Yes	No	Addressed and completed
Transport 2	No	Clarification and further information sought	No	Addressed and completed

²⁰ Definitions of Audit Categories:

Category 1: Serious Non-Compliance risk: matters identified in the review as non-compliant. Issues in this category carry the highest degree of risk to Inghams.

Category 2: These matters are not necessarily a breach of any legal or regulatory obligation but represent a category of potential non-compliance which should also be reviewed and addressed where necessary

Category 3: We provide some recommendations that in our view would be a benefit to Inghams if implemented.

5. ASSESSING OUR EFFECTIVENESS

Inghams is committed to continuously improving how we assess the effectiveness of our actions in addressing modern slavery risks. We understand this requires a multi-pronged approach of qualitative and quantitative methods as well as a multi-tiered governance structure. The governance structure set out in section 4 effectively manages risks in our operations through policies, grievance mechanisms, and whistleblower processes.

We recognise the need for ongoing improvements in identifying and mitigating risks within our supply chain. We are committed to supplier due diligence in high-risk industries and will introduce additional key performance indicators to measure progress in future years.

Table 6: Update on Key Progress

Area	Progress in FY25
Policies and procedures	Introduced requirement for all new vendors on our new procurement platform to agree to our Supplier Code of Conduct as a condition of onboarding.
Capability and awareness	Rolled out Modern Slavery awareness training to members of our Modern Slavery Working Group and key business stakeholders that operate within or adjacent to higher risk areas identified.
Audit and risk assessments	Completed four audits, as outlined in section 4.7. The observations raised have been addressed and we are working with the suppliers to resolve outstanding issues. Risk assessments now completed for all new vendors as part of supplier onboarding.



6. ANY OTHER RELEVANT INFORMATION

6.1 INCLUSION, EQUITY AND DIVERSITY

Our strong focus on inclusion, equity, and diversity underpins our commitment to a fair and respectful workplace and strengthens our efforts to identify and address modern slavery risks. We recognise that inequality, discrimination and lack of representation can heighten vulnerability to exploitation. By fostering an inclusive culture that promotes equal opportunity, representation and respect, we are taking action to identify and address these vulnerabilities and build safe, dignified workplaces that respect human rights across our operations and supply chain.

Our Inclusion, Equity and Diversity (IED) Policy outlines our commitment to equality and providing a workplace that recognises an inclusive and diverse environment. Our IED policies and practices demonstrate our commitment to a fair place to work and commitment to human rights.

In FY25, 70% of our sites recognised diversity days, and we expanded our Parental Leave Policy to give primary carers up to 12 weeks leave after six months' employment. Coverage now includes surrogacy, guardianship and First Nations care such as Kinship Care in Australia and Whāngai in New Zealand.

Gender

Gender inequality is a recognised driver of vulnerability to modern slavery. In FY25, Inghams submitted its Workplace Gender Equality Report (WGEA) and reported a 0.5% increase in our gender pay gap from 9.6% to 10.1% below the WGEA national benchmark of 21.8%. We understand this reflects gender imbalance in senior leadership, where women comprise 43% of our Board, 25% of the Executive Leadership Team, and 33% of the 59 members of the Organisational Leadership Team. We launched Infinity, a women's development network designed to support our women-in-leadership target of 40% through mentoring and succession planning.



Ethnicity

To ensure fair access to information and reduce communication barriers that can increase exploitation risks, all People and Performance policies are available in the top 10 languages spoken across our business, with multilingual video tutorials for some Finance and Technology policies. We've also transitioned to a new internal communications platform with built-in translation functionality to improve access to information and rights awareness for culturally and linguistically diverse employees.

First Nations Engagement

We advanced our Reflect Reconciliation Action Plan (RAP) by embedding First Nations inclusion in recruitment and learning programs, benchmarking First Nations employment, and integrating diversity data into our new supplier system. We supported equitable participation, including culturally significant events and celebrations across National Reconciliation Week and NAIDOC Week in Australia, and Matariki in New Zealand.

LGBTQ+

Leveraging our membership with ACON (the AIDS Council of NSW), we established confidential contacts, updated our parental leave policy, and promoted monthly online training and annual events to support inclusivity. We also participated as a panellist in the Western Sydney Summit, chaired by Pride in Diversity, to share our initiatives promoting LGBTQ+ awareness. These initiatives help reduce risks of discrimination and isolation which are known indicators of increased vulnerability to exploitation.



Inghams upholds high standards of conduct and welcomes feedback to improve our due diligence practices within our operations and supply chains. If you have concerns about modern slavery, potential human rights issues or unethical behaviour in our operations or supply chain, we encourage you to contact us to raise your concern anonymously through our third party provider, Citation HR.

Australia

1300 130 423
inghamshrassured.com.au

New Zealand

0800 003 795
inghamshrassured.co.nz

ingham.com.au