

**MODERN SLAVERY STATEMENT  
2024**

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This statement sets out what we have done to identify, manage and mitigate risks of modern slavery in our operations and supply chain.

INGHAMS GROUP LIMITED  
ACN 162 709 506  
("Inghams" or "Company")

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# INTRODUCTION FROM CHIEF EXECUTIVE OFFICER AND MANAGING DIRECTOR



Inghams is committed to respecting human rights, including the right to freedom from modern slavery, and works to identify and address any human rights and modern slavery risks that may be identified throughout our supply chain. No instances of modern slavery were identified in FY24.

Inghams has policies and processes in place to ensure that we comply with all relevant regulations and standards and upholds all relevant labour rights.

The 2030 Inghams Sustainability Leadership Roadmap includes Modern Slavery and Human Rights as one of the key material topics.

Inghams' values of care, courage, curiosity and commitment support ethical and professional conduct and behaviours within our business, and we expect these same high standards from our people, partners and suppliers.

This Statement is made pursuant to Australia's Modern Slavery Act 2018 and was approved by the Inghams Group Limited Board on 26 November 2024 on behalf of all reporting entities covered by this Statement.

A handwritten signature in black ink, appearing to read 'Andrew Reeves'.

**Andrew Reeves**  
Chief Executive Officer and Managing Director  
Inghams Group Limited



## 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. Aboriginal and Torres Strait Islander peoples have nurtured the waters, the skies and lands for hundreds of thousands of years and will continue to do so as their culture, traditions and customs will live on for time immemorial.

Inghams also acknowledges and respects Nga Iwi Māori as the Tangata Whenua of Aotearoa New Zealand and is committed to upholding the principles of the Te Tiriti O Waitangi.

ARTWORK BY KELLY TAYLOR

# 1. ABOUT THIS STATEMENT

Inghams' Modern Slavery Statement ("Statement") is made in accordance with Section 14 of the Modern Slavery Act 2018 (Cth) and describes the steps taken by Inghams during the financial year ended 29 June 2024 to mitigate the risk of modern slavery in the Group's businesses and supply chains in both its Australian and New Zealand operations.

Inghams' Modern Slavery Statement is available on our website ([inghams.com.au](http://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 Inghams' 2030 Sustainability Leadership Roadmap, Sustainability Report and Sustainability Data Book is available on Inghams' website.

## 1.1 IDENTIFICATION OF THE REPORTING ENTITY

This Statement is a joint statement made by Inghams Group Limited (ASX: ING) and on behalf of those subsidiaries which are Reporting Entities, as set out in Box 1 (each a "Reporting Entity"). This Statement has been prepared in consultation with each Reporting Entity covered by the Statement in the manner referred to in section 1.2 and 1.3 of this Statement. These entities have been included as they are wholly owned subsidiaries within the Inghams Group, of which Inghams Group Limited is the ultimate parent entity and undertake a range of functions including managing sales and operations, procurement and employment.

For each Reporting Entity, the Statement is approved by Inghams Group Limited, as the ultimate parent entity which directly or indirectly controls each Reporting Entity covered by the Statement. With regards to Inghams Group Limited, the Statement is approved by its Board of Directors.

## 1.2 CONSULTATION WITH INGHAMS' REPORTING ENTITIES

To develop this joint Modern Slavery Statement, we consulted with Inghams' Reporting Entities (detailed in Box 1 below) via representatives in Inghams' Modern Slavery Working Group (MSWG).

The MSWG included employees from the Sustainability, Legal, Procurement and Supply Chain, People and Performance, Compliance, and Risk functions across Inghams and its Reporting Entities in Australia and New Zealand. The MSWG membership includes the Company Secretary, who is the company secretary of all the entities listed in Box 1.

Our approach includes engagement with relevant business units, the Executive Leadership Team (ELT) and the Board. The engagement sought to provide an overview of the Act's obligations, outline the actions planned to address these requirements, including any relevant updates; and sought feedback on the matters contained in the Modern Slavery Statement.

The Chief Executive Officer and Managing Director of Inghams Group Limited and the Chief Financial Officer of Inghams Group Limited are directors and/or other officers of each of the Inghams Reporting Entities. As such, consultation with the ELT involves consultation with directors and/or other officers from all the Reporting Entities. The company secretary is common across all the entities, and contributed to, and reviewed the final Statement. Wherever possible, policies and procedures were applied consistently across all Reporting Entities, with specific accommodations made for any unique New Zealand requirements.

## 1.3 APPROVAL BY PRINCIPAL GOVERNING BODY

This Modern Slavery Statement was approved by the Inghams Group Limited Board on 26 November 2024.

Each of the Inghams Reporting Entities is a wholly owned subsidiary of Inghams Group Limited.

The Chief Executive Officer and Managing Director of Inghams Group Limited and the Chief Financial Officer of Inghams Group Limited are Directors and/or other officers of each of the Inghams' Reporting Entities. The Chief Executive Officer and Managing Director, the Chief Financial 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](mailto:investorrelations@inghams.com.au)  
Modern Slavery Statement or Sustainability queries: [sustainability@inghams.com.au](mailto: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.

## 2. INGHAMS' OPERATIONS AND SUPPLY CHAINS

### 2.1 COMPANY OVERVIEW

Inghams is the largest integrated poultry producer across Australia and New Zealand.

We supply chicken, turkey and plant-based protein products to retail customers, quick service restaurants, foodservice distributors, and wholesale and export channels. We are also one of the largest producers of stockfeed in Australia.

Inghams' approach to identify, manage and mitigate risks of modern slavery in our operations and supply chain is informed by our values of care, courage, commitment and curiosity. Inghams brings these values to life through our commitment to be a good place to work.

**GEOGRAPHICALLY DIVERSE NETWORK.**

**WE EMPLOY APPROXIMATELY 8,000 PEOPLE.**

**LISTED ON THE ASX IN 2016.**



## 2.2 OUR OPERATIONS

Our geographically diversified network 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.

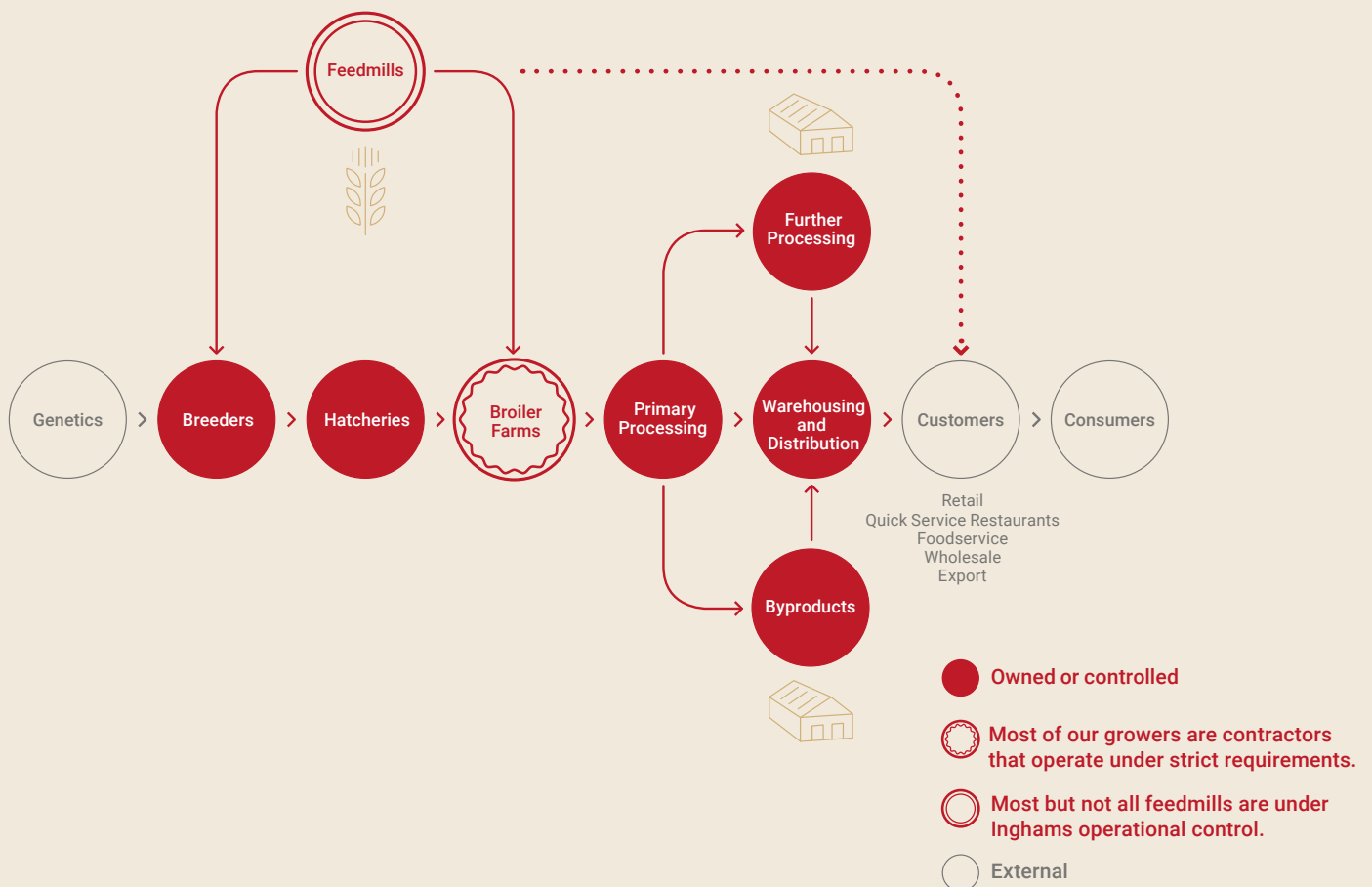
Our scale and operations span the entire value chain from farming to processing and distribution. Our poultry supply chains are vertically integrated within the business.

Our website – [inghams.com.au](http://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 [inghams.co.nz](http://inghams.co.nz) and [waitoafreerange.co.nz](http://waitoafreerange.co.nz)

### Our key operations are:

- **Farming:** includes breeder farms for fertile egg production as well as hatcheries and broiler farms.
- **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.

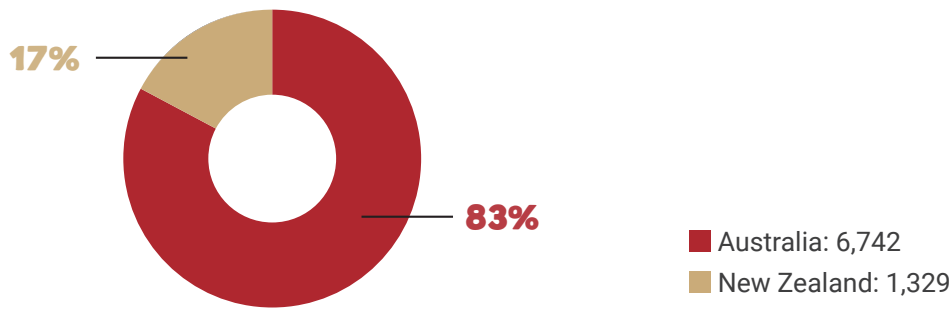
A key part of our value chain is the network of broiler farms that grow our birds. These growers are contractors that operate under strict guidelines, including animal health and welfare, feed regime and worker condition requirements.



## 2.3 OUR EMPLOYEES

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

**Figure 1: Distribution of Employees by Country<sup>1</sup>**



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

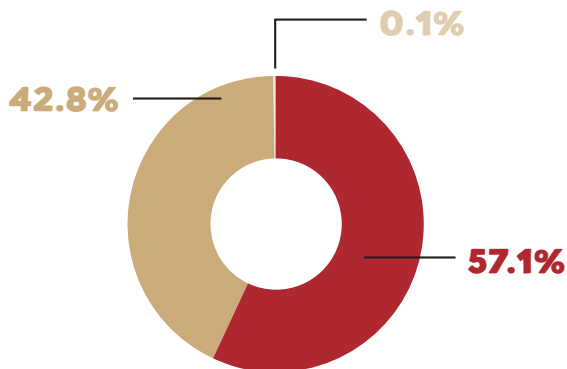
**Table 2: Team by Function and Employment Type**

Function / Employment type	Full time	Part time	Casual	% under EBA
Agribusiness	178	8	14	77%
Farming	470	41	402	88%
Primary processing	3,490	210	792	96%
Further processing	721	101	186	93%
Supply chain	668	49	292	93%
Sales and marketing	129	3	3	32%
Corporate support	315	15	5	1%

Our gender diversity is demonstrated through the statistics below.

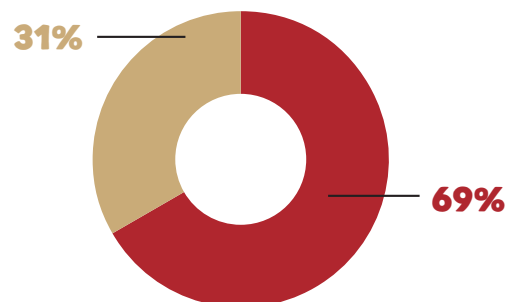
**Figure 2: Gender Representation - Total Workforce**

■ Male: 57.1%  
 ■ Female: 42.8%  
 ■ Other: 0.1%



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

■ Male: 69%  
 ■ Female: 31%



<sup>1</sup> Data effective 30 June 2024.



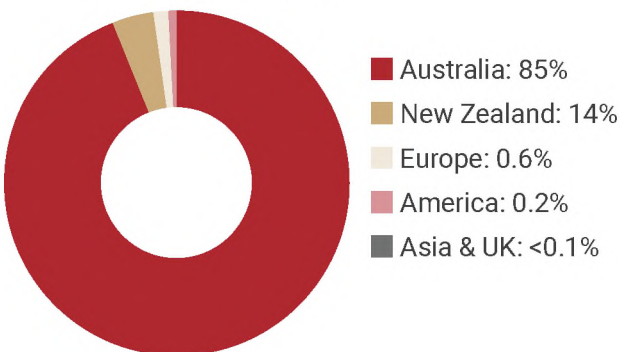
## 2.4 OUR SUPPLY CHAINS

### Inghams direct (Tier 1) suppliers

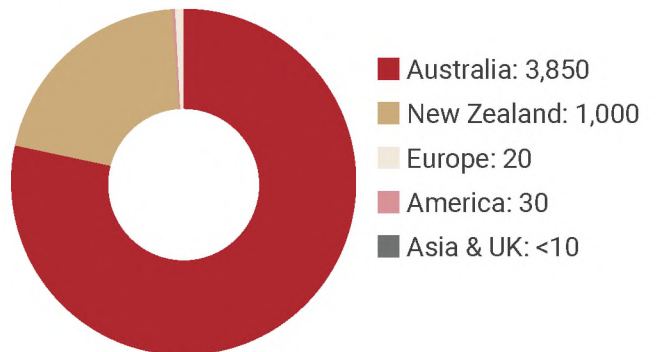
In FY24, Inghams sourced goods and services from approximately 4,900 direct suppliers (Tier 1<sup>2</sup>), which includes low spend and one-time suppliers. Of these, approximately 1,300 are suppliers with more than \$100,000 in spend.

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<sup>3</sup>. Tier 1 providers are key partners in leveraging the global market. Inghams is seeking to develop greater visibility within Tier 2 spend through investments in technology and supplier management frameworks.

**Figure 4: Inghams FY24 Tier 1 Spend by Country (%)**



**Figure 5: Inghams FY24 Tier 1 Number of Suppliers<sup>4</sup> by Country**



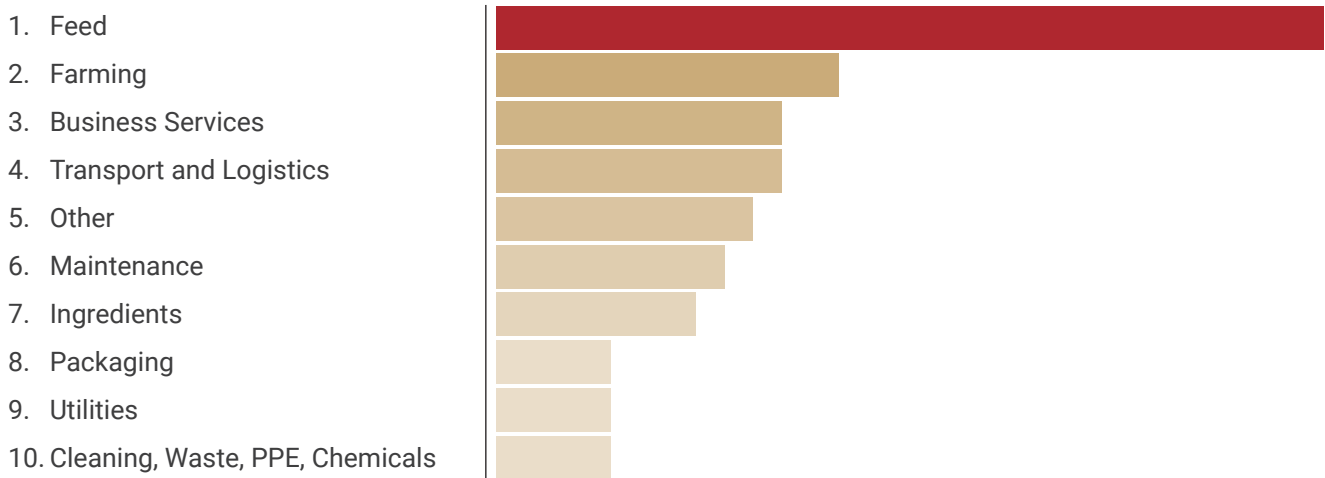
<sup>2</sup> Tier 1 Suppliers: These are direct suppliers of the final product or service. Tier 2 suppliers: These are suppliers or subcontractors for our tier 1 suppliers. Tier 3 suppliers: These are suppliers or subcontractors for our Tier 2 suppliers.

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

<sup>4</sup> Rounded to nearest 10 as at end FY24.

A summary of Inghams' FY24 Tier 1 spend by category is outlined in the figure below.

**Inghams Direct Spend (Tier 1) top 10 by category  
FY24 Key Spend Areas**

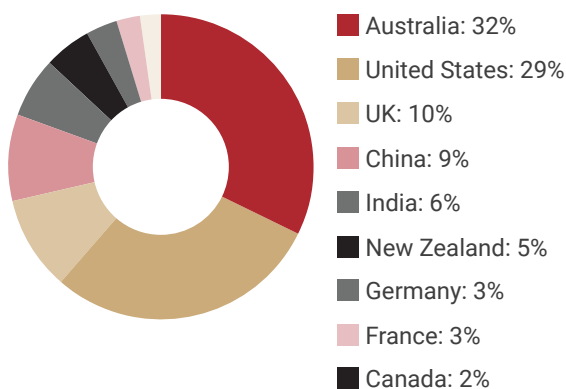


**Inghams indirect (Tier 2) suppliers**

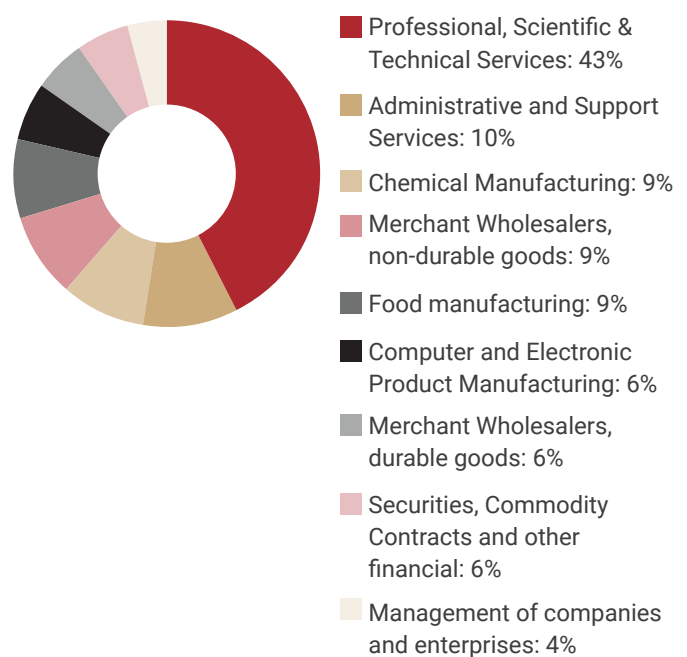
While most of our direct (Tier 1) suppliers are based in Australia and New Zealand, these suppliers can source goods from overseas. For our top 1,100 suppliers, we have identified where our Tier 2 suppliers (suppliers or subcontractors to our Tier 1 suppliers) are located through analysis via our supplier insight software, Interos, as outlined in section 3.1. A detailed description of how these suppliers were identified is discussed in section 3.

The majority of Tier 2 suppliers are based in Australia, USA, UK and China. The remainder of Tier 2 suppliers are spread across Asia, South America, Europe and Canada. This group of suppliers covers industries such as 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 Country<sup>5</sup>**



**Figure 8: Number of Tier 2 Vendors by Industry<sup>6</sup>**



<sup>5</sup> 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.

<sup>6</sup> Tier 2 vendors have been identified through data analysis described in section 3.1. Where Tier 2 vendors were listed as unknown category, these are not reported.

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

This section describes the risks of modern slavery practices in Inghams’ operations and supply chains.

## 3.1 RISK ASSESSMENT APPROACH

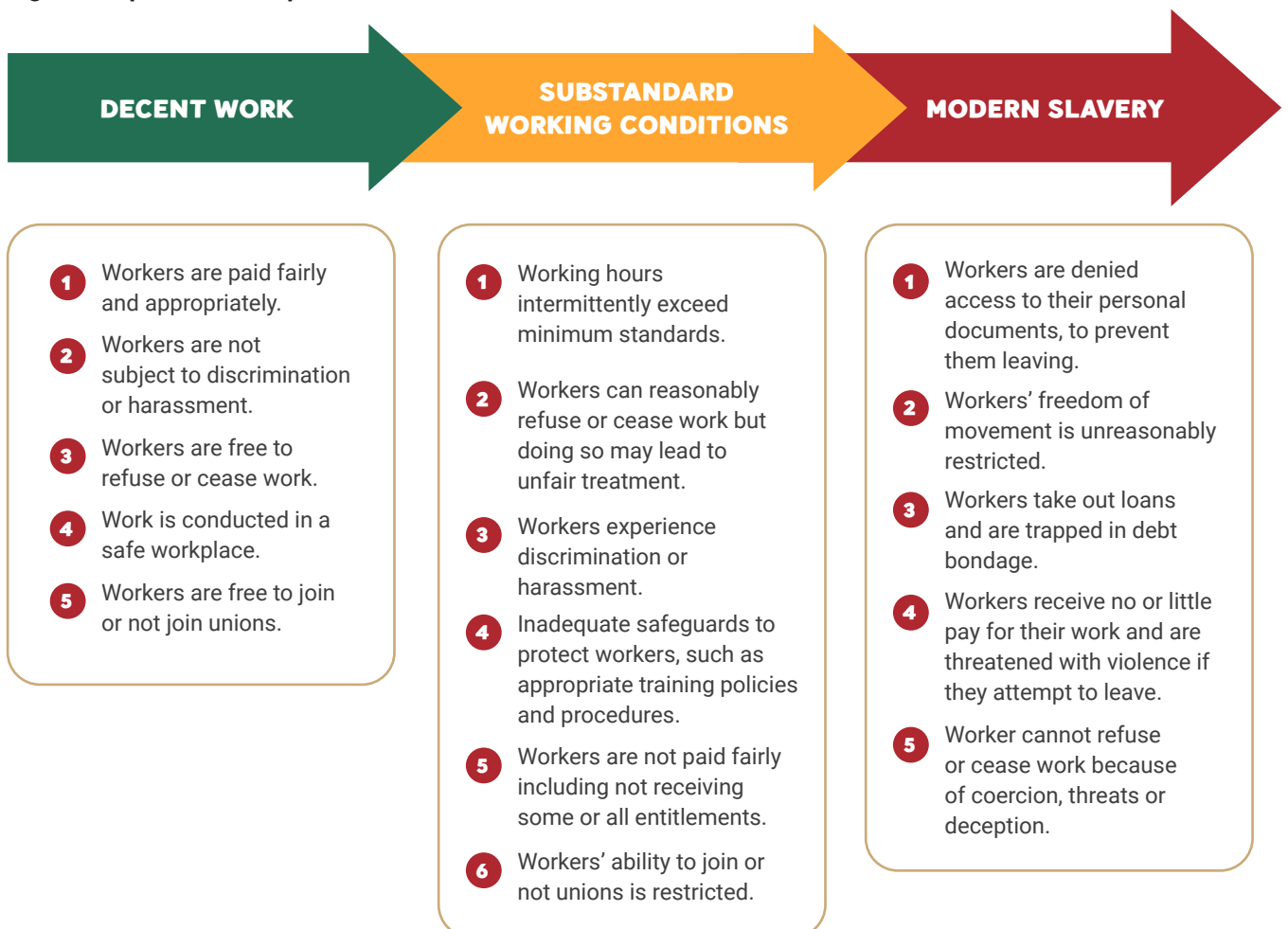
Inghams may be exposed to a range of potential modern slavery risks. We focus on identifying and understanding these risks, including assessing how they could occur in our operations and supply chain, and the ways that our actions may shape the risk. Our approach to assessing our modern slavery risks in our operations and supply chain is outlined below.

### Definitions of decent work to modern slavery

Modern slavery describes situations of serious exploitation. The Australian Modern Slavery Act 2018 defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour (children are subjected to slavery or similar practices or engaged in hazardous work)<sup>7</sup>.

Modern slavery occurs at the most serious end of the labour exploitation continuum. The boundaries are not clear, which means it can be challenging to understand whether a particular situation of exploitation meets the threshold for modern slavery. The ‘Spectrum of Exploitation’ in Figure 9 below shows that exploitation may manifest in various forms and levels of seriousness across the supply chain.

Figure 9: Spectrum of Exploitation



<sup>7</sup> 7 Commonwealth Modern Slavery Action 2018 Guidance for Reporting Entities May 2023.

### Our approach at Inghams

Inghams takes an integrated approach to ensuring decent work practices, identifying risks of substandard working conditions, as well as addressing risks of modern slavery. The risk assessment and controls are undertaken as one program. If an issue is found, our response is in line with the level of seriousness of the issue identified, as outlined in Figure 9: Spectrum of Exploitation.

### Risk assessment process

Our approach to the assessment of modern slavery risks in our operations and supply chain is described below. Our professional judgment, informed by these sources, allows us to evaluate risk levels across our supply chain and operations. We recognise the need for a more formal process as we further develop our approach to modern slavery.

#### **Consider public information sources and databases**

In assessing the risks of modern slavery within our operations and supply chains, we leverage insights from external sources as outlined in Table 3 below. These sources provide valuable information on known risk factors in the agriculture and food processing sector. These public sources outline identified modern slavery risks including country specific risks and industry/sector risks.

**Table 3: Public Sources of Information Considered**

Source
Interos Supply Chain Resilience Database
Global Slavery Index (GSI) <sup>8</sup>
Global Rights Index <sup>9</sup>
US Department of Labor, List of Goods Produced by Child Labor or Forced Labor, 2024 <sup>10</sup>
International Labour Organization industry ratings from the Global Estimates of Modern Slavery <sup>11</sup>

8. Global Slavery Index, WalkFree (2023).

9. Global Rights Index, International Trade Union Confederation (2024).

10. List of Goods Produced by Child Labor or Forced Labor, US Dept. of Labor (2024).

11. <https://www.ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage>.

**Consider potential risk factors that may be related to a product or service**

In considering risks in our supply chain, Inghams considers the likelihood of known risk factors based on published sources for modern slavery (see Table 3), which include:

- Reliance on temporary or migrant workers
- High levels of subcontracting
- Links to high-risk geographies
- Reliance on lower skilled labour
- Absence of grievance mechanisms
- Dangerous / substandard conditions
- Complex and fast-moving supply chains
- Use of third-party recruitment, and
- Isolation of workers.

**Consider internal information about our operations and supply chain**

The following information relating to our operations and supply chain help us consider where risk factors may be present:

- Information from audits, internal complaints or whistleblower information
- Feedback from customers
- Scale of spend within categories or geographies, and
- Outcomes of audits undertaken in collaboration with our customers or internally.



**Consider supply chain data analysis**

We use data analysis to assess modern slavery risks in both Tier 1 and Tier 2 of our supply chain, focusing on geographical and sector vulnerabilities that increase the risk of exploitation for workers.

To enhance the identification of potential modern slavery risks within our supply chain, we engaged third-party experts Illion and Interos. Illion supports this process through data enrichment services that help identify the parent entities and identifies key risk factors related to worker vulnerabilities, such as economic instability. Interos applies artificial intelligence to analyse these risk factors, identifying suppliers in our Tier 2 supply chain that may be linked to modern slavery risks.

The risk factor categories assessed by Interos are:

- Environmental, social, and governance (ESG) risk, such as human rights risks related to labour practices, working conditions, and environmental impacts
- Geopolitical risks, such as political instability and weak rule of law, which can lead to unregulated labour practices
- Financial health of suppliers, which may indicate a higher reliance on exploitative labour to remain competitive
- Cyber risk, focusing on how technological infrastructure and supply chain disruptions could impact vulnerable workers
- Restrictions risk, such as defence and commerce, and
- Operational risks related to disruptions, such as natural disasters or pandemics, that heighten the vulnerability of workers to exploitation.

The outcome of our data enrichment activity provided us with a list of suppliers classified based on the Australian and New Zealand Standard Industrial Classification (ANZSIC) and the North American Industry Classification System (NAICS). We have used these classifications to validate and update our internal category records, which are linked to assigned category managers.

For the purposes of modern slavery risk analysis, we used a two-step approach and focused on Tier 2 suppliers. The process firstly identifies countries that are at risk of modern slavery, followed by identification of industries that are at risk of forced labour. These scores are used to identify which Tier 2 suppliers are potentially at risk of modern slavery, and in turn how they relate back to our Tier 1 suppliers.

### Assess our potential level of involvement

Once potential areas have been identified, Inghams' level of potential involvement is considered to support decisions on priority areas for focus. The following definitions of involvement used by Inghams are in line with the guidance provided by the UN Guiding principles on Business and Human Rights (UNGPs)<sup>12</sup>:

- **Cause:** A business may cause modern slavery when its activities (including omissions) directly result in modern slavery occurring
- **Contribute:** A business may contribute to modern slavery when its actions (or omissions) increase the likelihood of modern slavery occurring, even if the business did not engage in modern slavery practices itself, and
- **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, labour hire companies that work within Inghams' operations have been prioritised for independent audits as Inghams has a closer relationship to these suppliers. If issues were found, Inghams could potentially be considered in the above definitions to contribute to any labour issues.



<sup>12</sup> [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf).

### 3.2 RISKS IN OUR OPERATIONS

Inghams' operations and each Reporting Entity are considered to have a low risk of modern slavery practices due to the governance and controls in our operations outlined below.

- **Geography:** Inghams and the Reporting Entities have no operations outside of Australia and New Zealand.
- **Direct Employment:** The vast majority of Inghams employees at its own operations are directly employed. In this regard, the risk of modern slavery is considered low. Inghams strives to establish workplace relations that are fair, constructive and collaborative.
- **Enterprise Bargaining Agreements:** Collectively negotiated agreements cover 88% of our people in operations across Australia and New Zealand. In Australia, these agreements are approved by the Fair Work Commission to ensure that employees are better off overall compared to the applicable minimum terms of modern awards. In New Zealand, these agreements are approved and signed by the relevant trade union. These collectively negotiated agreements stipulate minimum conditions for wages, hours of work, overtime conditions, additional remuneration, leave entitlements and redundancy benefits. Where the relevant employees are not covered by collectively negotiated agreements, in Australia they are typically employed under the terms of modern awards, on above-award wages, and in New Zealand they are employed under the terms of individual employment agreements. For more senior positions, these are commonly engaged under the terms of common law contracts.
- **Compliance with Australian and New Zealand employment law:** All Australian employees remain subject to the minimum conditions in the National Employment Standards and New Zealand employees remain subject to the minimum conditions of the Employment Relations Act. These minimum conditions are supported by a range of policies providing additional benefits, such as paid parental leave. Inghams' employment practices comply with all local laws in Australia or New Zealand (as relevant).

- **Recruitment Governance:** Our recruitment process is guided by our Recruitment and Selection Policy. Employment decisions for Inghams' owned operations are based on the principle of merit, with no instances of forced labour.
- **Right to work governance:** All employees must demonstrate their legal right to work in Australia. We also use a visa verification system to support ease of collection, validation and tracking of working rights on an ongoing basis. The visa verification system is integrated to our time and attendance system meaning employees can only be rostered in accordance with their visa conditions.

#### Supplementary labour hire

Inghams engages labour hire firms in Australia to provide supplementary labour in its operations. The most likely risks of modern slavery within Inghams' operational activities correspond to indirect workers engaged through outsourced services. Outsourced services that provide supplementary labour include labour hire, cleaning, security, transport, and farming operations.

Our reliance on labour hire providers remains low with over 90% of our people employed directly by Inghams. Our contracts with labour hire providers require that they take reasonable steps to ensure that there is no modern slavery in their supply chain, make themselves available for periodic audits as well as notify Inghams immediately if they become aware of any actual or suspected modern slavery in the supply chain associated with the contract. During FY25, we are continuing to strengthen the governance and compliance associated with the engagement of labour hire providers, including reviewing our preferred supplier list and re-contracting with selected suppliers post tender evaluation process. Our actions to assess and address these risks are outlined in section 4.

### 3.3 RISKS IN OUR SUPPLY CHAINS

Inghams sources products and services from suppliers ranging from small independent farmers to large multi-nationals, predominantly sourcing from Australia and New Zealand.

Inghams maintains a high ethical standard across our own operations. In line with our values of care and commitment, it is our aim to ensure that the ethical standards that apply within our own sites are also adhered to in our supply chains. The identification of risk within our supply chains is a key initial step to understanding what is required and prioritising subsequent actions.

While Inghams sources goods and services predominantly from Tier 1 suppliers located in Australia and New Zealand, there are inherent risks further along the supply chains in Tier 2 and Tier 3 suppliers (suppliers or subcontractors to our Tier 2 suppliers). 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.

The identified potential risk supply categories based on our risk assessment approach are outlined in Table 4.

**Table 4: Inghams Priority Risk Areas**

Risk Area	Potential risk categories identified by published sources	Key Risk Factors	Our potential relationship to the risk <sup>13</sup>
Labour and service providers in our Australian & New Zealand supply chains	<ul style="list-style-type: none"> <li>• Cleaning and laundry services<sup>14</sup></li> <li>• Labour hire<sup>15</sup></li> <li>• Security<sup>19</sup></li> <li>• Contracted Broiler farms<sup>16</sup></li> <li>• Maintenance services<sup>17</sup></li> <li>• Transport</li> </ul>	<ul style="list-style-type: none"> <li>• Reliance on lower skilled labour/ low barrier to entry of work</li> <li>• Reliance on temporary or migrant workers</li> <li>• High levels of subcontracting.</li> </ul>	Contribute or Directly linked
Sourcing of raw material ingredients for feed and products	<p>Risk ingredients may include:</p> <ul style="list-style-type: none"> <li>• Soy meal and other feed ingredients sourced from overseas<sup>23</sup></li> <li>• International shipping<sup>18</sup></li> <li>• Other chicken feed ingredients from Australia<sup>19</sup></li> <li>• Sourcing of ingredients for our products, such as flavourings or salt<sup>20</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Reliance on lower skilled labour</li> <li>• Potential links to higher risk geographies</li> <li>• Complex and fast-moving supply chains</li> <li>• Use of third-party recruitment</li> <li>• International shipping has risk factors including isolation of workers</li> </ul>	Directly linked
Sourcing of goods not for resale but for use in operations	<ul style="list-style-type: none"> <li>• Uniforms<sup>21</sup></li> <li>• Personal Protective Equipment (PPE)<sup>22</sup></li> <li>• Information Technology hardware and solar panels<sup>23</sup></li> <li>• Chemicals</li> <li>• Pallets<sup>24</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Reliance on temporary or migrant workers</li> <li>• Potential links to high-risk geographies</li> <li>• Complex and fast-moving supply chains</li> <li>• Use of third party recruitment</li> </ul>	Directly linked

13. In our key risk areas we have sought to define our relationship to risk against the UNGP continuum of "Cause", "Contribute", "Directly Linked".

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

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

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

17. 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).

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

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

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

21. Global Slavery Index.

22. Business and Human Rights Resource Centre 2018.

23. 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.

24. The location of timber sourced for pallets can include countries at risk of modern slavery [https://www.brambles.com/Content/cms/pdf/2023/Brambles\\_Modern\\_Slavery\\_Statement\\_FY23.pdf](https://www.brambles.com/Content/cms/pdf/2023/Brambles_Modern_Slavery_Statement_FY23.pdf).

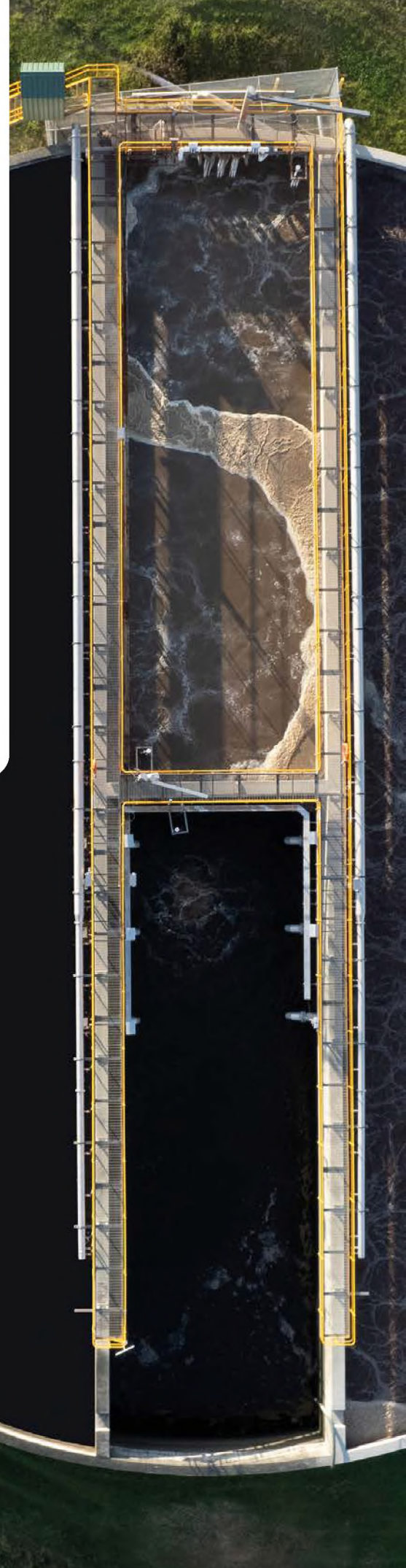
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## 4. DESCRIPTION OF ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

This section outlines actions taken by Inghams to assess and address risks identified in our operations and supply chain, including due diligence to identify, prevent and mitigate any risks and any remediation processes.

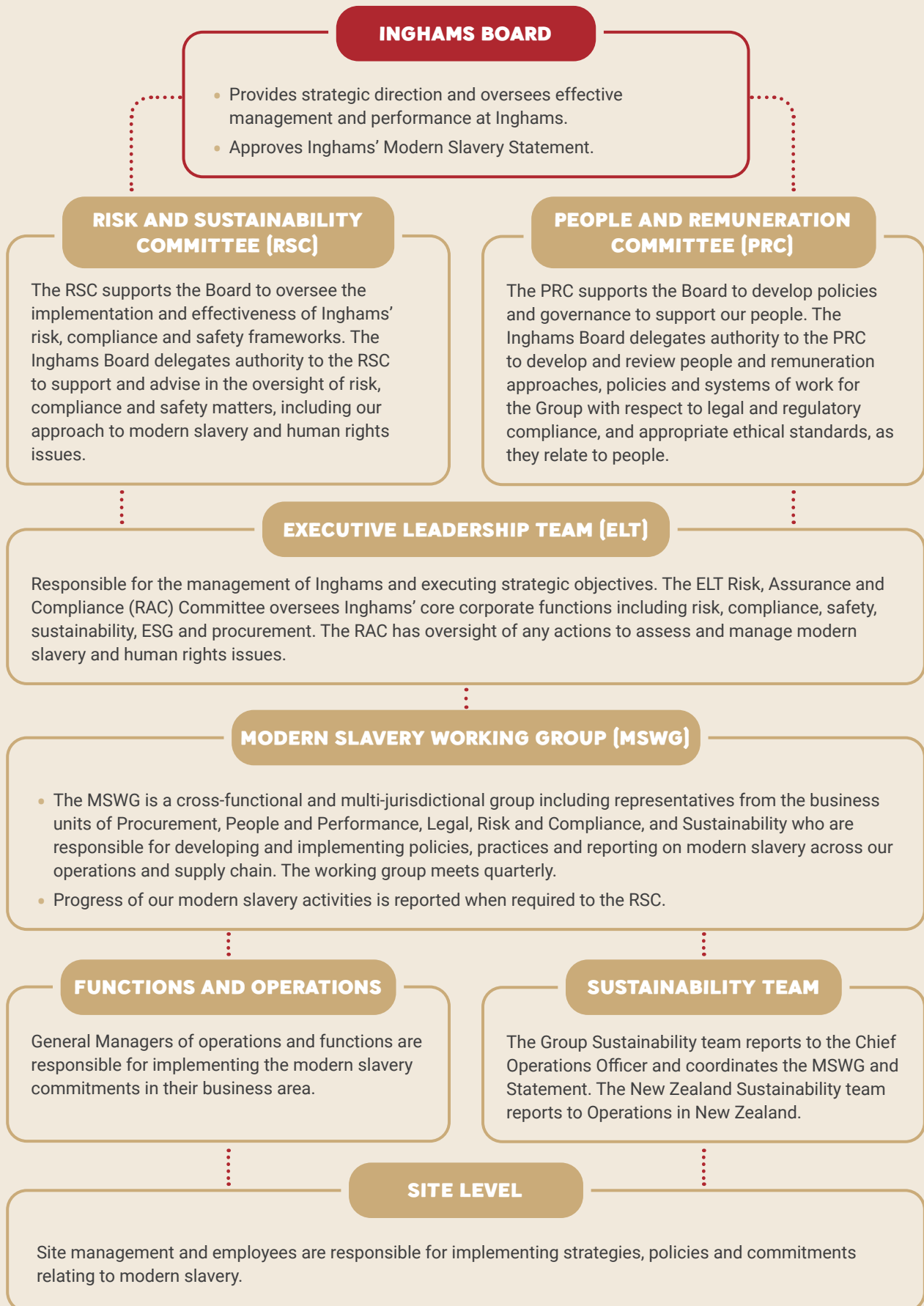
It covers the following areas:

- Governance framework
- Policies and procedures
- A Good Place to Work: recruitment and working conditions
- Capability and awareness
- Our grievance and remediation approach
- Partnerships
- Responsible sourcing
- Audit



## 4.1 GOVERNANCE FRAMEWORK

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



## 4.2 POLICIES AND PROCEDURES

The policies summarised below support our work to prevent modern slavery. These policies aim to support workers in our operations and ensure 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	FY24 update
Code of Conduct	Outlines expected employee behaviour and business conduct, including legal, compliance and ethical standards.	These policies remain current and are easily accessible for all our people via our online communications platform which translates policies into the key languages spoken by our people.
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.	Introduced in FY24, communicated to all employees via toolbox talks and our online communications platform and email.
Discrimination, Harassment and Bullying Policy	Commits to a fair and respectful workplace, free from discrimination, harassment, sexual harassment and bullying.	Continued promotion through training and toolbox talks, promotion of training materials, online educational videos and frontline leader training programs.
Inclusion, Equity and Diversity Policy.	Commits to equity, 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.	Updated in FY24 to align with gender equality and pay equity legislation.
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 leader's responsibility to act upon grievances and to support our people.	Launched in FY24, communicated to all employees via in person, toolbox talks, our online communications platform as well as email.
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.	Continued promotion through training and toolbox talks, promotion of training materials, online educational videos and frontline leader training programs.
Work Health, Safety and Injury Management Policy	Commits to providing a safe, healthy workplace, safe equipment, safe systems and training to undertake safe behaviours and recognises its duty of care to 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.	These policies remain current and are easily accessible for all our people via our online communications platform which translates policies into the key languages spoken by our people.
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.	



### 4.3 A GOOD PLACE TO WORK: RECRUITMENT AND WORKING CONDITIONS

Inghams' recruitment and working conditions are driven by our values of care, courage, curiosity and commitment. We aim 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 followed across Australia and New Zealand.

The work rights and visa status of all employees are verified before commencing employment, including verification with the Department of Home Affairs for Australian employees who are not citizens or permanent residents.

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 the 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 the 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 on lodgement to ensure they are better than the relevant reference award, which would apply in the absence of the EA.

Employees are paid electronically via direct debit in accordance with an electronic time and attendance system.

A number of controls are in place to manage the risk of systemic underpayment including system access controls, processing controls, timesheet controls, segregation of duties, spot checks and regular internal reviews and audits.



#### 4.4 CAPABILITY AND AWARENESS

Inghams has implemented training programs aimed at fostering a safe and inclusive workplace. These programs promote our values, which align with our commitment to human rights. While we have not yet introduced specific modern slavery training, our existing initiatives are foundational in building a workforce that is conscious of risks, such as exploitation and unethical practices. Looking ahead, we are exploring the introduction of a pilot modern slavery training in FY25 to further strengthen our ability to identify and mitigate modern slavery risks within our operations and supply chain.

##### Whistleblower training

During FY24, 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 operational development. Further information on this training is available in our FY24 Annual Report available on our website.

#### 4.5 GRIEVANCE AND REMEDIATION APPROACH

##### Operations: Whistleblower and prevention of bullying, harassment and discrimination

The Modern Slavery Act requires reporting entities to include information about the processes to remedy situations where they may have caused or contributed to modern slavery. We are committed to addressing grievances promptly and effectively via our Grievance Procedure and Whistleblower processes.

The Grievance Procedure was launched in FY24 and is outlined in Section 4.2.

The Whistleblower Policy is available on our website. We encourage the use of our whistleblower systems to report grievances related to potential instances of modern slavery.

##### FY24 performance

Our performance in FY24 is outlined below.

- Reporting levels across all matters reported internally including bullying, harassment, inappropriate behaviour, sexual harassment, discrimination or other misconduct saw an increase in FY24 compared to FY23 reflecting continued positive levels of awareness and uptake of our processes amongst our people.
- None of the reported matters amounted to misconduct as defined in the Corporations Act or Modern Slavery Act.
- Across FY24, five complaints were made via the whistleblower process, which is a decrease from seven in FY23. However, we saw an increase in matters reported directly to our People Leaders and/or People and Performance team, demonstrating increasing levels of comfort and confidence from our people with direct reporting.

## Supply chain

The Act requires reporting entities to include information about the processes to remedy situations where they may have caused or contributed to modern slavery. It is noted that no instances of modern slavery have been identified in our supply chains.

While our formal remediation procedure is still evolving, 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 Figure 9, spectrum of exploitation, and the supplier's willingness to engage in remedial action, we firstly seek to work with the supplier to pursue such 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 in FY24. Refer to Section 4.8.

During FY25, 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.

## 4.6 PARTNERSHIPS

Externally, we work with supply chain partners, labour providers, customers, experts and industry bodies and other enforcement bodies as required to ensure the risk of modern slavery is minimised.

To support our modern slavery approach, we work with the following third-party experts in this area:

- **SEDEX:** we are a member of SEDEX (Supplier Ethical Data Exchange) and work with our Customers to undertake SMETA (Sedex Members Ethical Trade Audit) audits of our facilities
- **AUS-MEAT:** engaged for their official accreditation to carry out independent audits.
- **Citation Legal:** an external law firm engaged to conduct Supplier Services audits on behalf of Inghams. The audits ensure Supplier Service employees have valid employment contracts, payslips, paid in accordance with time records and all employees have valid working rights that meet National Employment Standards, Fair Work Act and SMETA requirements.

- **Illion and Interos:** third-party specialists engaged to improve identification of potential modern slavery risks within our supply chains. Illion provides data enrichment services, and Interos provides risk analysis services.

## 4.7 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.

### Supplier code of conduct

The Supplier Code of Conduct is described in Section 4.2. All new suppliers with a projected spend greater than \$250,000 per annum are required to sign up to the Inghams' Supplier Code of Conduct including the Modern Slavery Supplier Commitments. If a supplier refused to sign the code, the onboarding process would not continue. In FY25, existing suppliers that Inghams spends greater than \$250,000 per annum will be requested to sign up, with a target that all suppliers have signed by 2030.

### Improving supplier management systems

Inghams has invested in a new supplier management system to support management of suppliers across the business. In FY24, Inghams commenced implementing the new finance and procurement software. The implementation will be finalised in FY25.

This new system will enable:

- New suppliers to sign the Inghams Supplier Code of Conduct as part of onboarding
- Modern slavery risk assessments as part of onboarding of new suppliers
- Where deemed relevant, new suppliers will be required to answer a Modern Slavery Screening Questionnaire, related to their modern slavery risks, policies and processes
- Any high-risk suppliers are flagged for follow up with formal action plans, and
- Allow for the development of supplier or category specific questionnaires relating to modern slavery as required.

Existing suppliers will be captured through the same system progressively as part of the contract renewal process.

## Contracts and agreements

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

In addition to our standard clauses about modern slavery, our new growing agreements require our contract growers to provide assurances regarding the working rights of their employees. As part of these assurances, growers must allow Inghams or a nominated third party to audit their compliance with both the working rights and modern slavery expectations. These new growing agreements are being progressively implemented.

For the purchase of grain both in Australia and overseas, Grain Trade Australia Trade Rules include requirements around Modern Slavery and Anti Corruption<sup>25</sup>.

## 4.8 AUDIT

### Internal audits

Inghams' internal audit function undertakes periodic reviews which may include governance controls for sustainability and modern slavery risks.

### Inghams audits and collaboration with our customers: Sedex Members Ethical Trade Audit (SMETA)

We are a member of SEDEX (Supplier Ethical Data Exchange) and share information on our performance with our customers.

As part of our own participation in SEDEX and to provide assurance to customers, we undergo third party (SMETA) audits at our primary and further processing sites to better understand standards of labour, health and safety, environmental performance, and ethics. The SMETA audit process is designed to protect workers from unsafe conditions, overwork, discrimination, low pay and forced labour.

Inghams also undertakes separate labour and sustainability audits on behalf of our customers, such as McDonald's and Yum!.

### SMETA Audit FY24 Outcomes

During FY24, SMETA audits took place at two of our further processing sites as well as our primary processing site in Western Australia, covering approximately 1,000 people, which represents over 10% of our workforce. The SMETA audit also encompassed our labour hire or third-party providers (where applicable). The SMETA audits completed during FY24 did not identify any instances of modern slavery, however, did reveal minor non-conformances with record keeping, particularly in relation to long serving (10+ years) direct employees of Inghams. These issues have since been rectified.

Where risks or actual non-compliance were identified in labour hire or third-party suppliers during the SMETA audits, we worked or are continuing to work, with those suppliers to rectify and improve their processes.

Pleasingly, the SMETA audit reports included identification of a number of good people processes. This included our employee recognition programs and approach to training and development including our leadership capability development programs (Grow and Thrive) and self-leadership program (Connect).

<sup>25</sup> [www.graintrade.org.au/sites/default/files/TRC/GTA%20Trade%20Rules%20December%202022.pdf](http://www.graintrade.org.au/sites/default/files/TRC/GTA%20Trade%20Rules%20December%202022.pdf).



## Supplier audits

At Inghams, we apply audits in labour intensive supplier categories where it is particularly challenging to fully understand the social conditions of workers employed within our supply chain. These categories have been identified as high risk through our risk assessment process.

Our approach to audits aligns with an ethos of 'trust but check'. We rely on the foundation of trust built with our suppliers, however we verify the practices of suppliers to mitigate the risk to workers' rights and conditions. When our audits identify potential non-conformances, our first step is to collaborate closely with our audit provider to gain a deeper understanding of the issue. Rather than immediately imposing punitive measures, we seek to work constructively with our suppliers to address these non-conformances, fostering long-term improvements and ensuring that the rights and welfare of workers are protected. This approach ensures that our audits are not just about compliance but are a tool for continuous engagement and improvement.

Inghams engages an external employment law firm to conduct these audits to identify any serious non-compliance, potential non-compliance or potential improvements to attain best practice. The employment law firm references the Sedex Members Ethical Trade Audit (SMETA) Measurement Criteria for labour standards, in particular workplace management, child labour, forced labour and hours of work for these audits.

The selection of suppliers to be audited was made in accordance with our new Supplier Social Accountability Audit process which was launched during FY24. This process includes a framework for how suppliers are selected for audit as well as the scope and process for auditing suppliers.

### Supplier audit FY24 outcomes

During FY24, 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 FY24: one supplier each from cleaning and transport industries and two audits of our contracted broiler farming operations.

Risks of potential non-compliance with labour standards were identified, as detailed in Table 5 below. The audits completed during FY24 did not identify any instances of modern slavery.

The majority of the identified risks or observations have already been resolved to a satisfactory level in conjunction with the relevant supplier.

The audit of the cleaning contractor identified risks related to employment records, potential underpayments as well as potential breaches of visa conditions. We remain in the process of working through outstanding risks with the supplier. The next steps for any outstanding items will depend on the outcomes of the process and the supplier response.

**Table 5: FY24 Social Accountability Supplier Audit Outcomes<sup>26</sup>**

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
<b>Supplier category</b>				
Growers (2 suppliers)	No	No	Clarifications and further information sought.	Addressed and completed.
Cleaner	Yes	Yes		Remedial actions underway.
Transport	Clarification and further information sought regarding one item. Item closed.	Yes		2 of 3 items closed. Remedial actions underway to close out final observation.

<sup>26</sup> Definitions of Audit Categories:

<sup>27</sup> 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.

<sup>28</sup> 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.

<sup>29</sup> Category 3: We provide some recommendations that in our view would be a benefit to Inghams if implemented.

## 5. ASSESSMENT OF EFFECTIVENESS

Assessing effectiveness is complex and we are continuing to explore opportunities to strengthen our approach. Inghams is committed to continuously improving how we manage modern slavery risks across our operations and supply chains. Our Modern Slavery Working Group, made up of key representatives across regions and functions, reports to the Board Risk and Sustainability Committee. The governance structure effectively manages risks in our operations through policies, grievance mechanisms, and whistleblower processes.

In our supply chain, we recognise the need for ongoing improvements in identifying and mitigating risks. As part of our 2030 Sustainability Leadership Roadmap, 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 FY24
Governance	We have defined a clear governance chart, see section 4.1.
Policies and procedures	We have introduced a Grievance Procedure, as outlined in section 4.2.
Capability and awareness	We have continued activities to raise awareness relating to Grievance and Whistleblower policies, as outlined in section 4.4.
Audit and risk assessments	We have completed four audits, as outlined in section 4.8. The majority of the observations raised have been addressed and we are working with the suppliers to resolve outstanding issues.
Grievance and remediation	<p>As outlined in section 4.5, reporting levels across all matters reported internally increased in FY24 compared to FY23 reflecting continued positive levels of awareness and uptake of our processes amongst our people.</p> <p>Across FY24, whistleblower complaints decreased from FY23, however, we saw an increase in matters reported directly to our People Leaders and/or People and Performance team demonstrating increasing levels of comfort and confidence from our people with direct reporting.</p>

## 6. ANY OTHER RELEVANT INFORMATION

### INCLUSION, EQUITY AND DIVERSITY

Inghams' strong focus on inclusion, equity, and diversity underpins our commitment to a fair and respectful workplace, which extends to our efforts to address modern slavery risks. By fostering an inclusive environment that prioritises gender equality, ethnic diversity, and respect for marginalised groups, we are cultivating a workplace culture that values human rights, equality, and the dignity of all people.

Our Inclusion, Equity and Diversity (IED) Policy outlines our commitment to equality and providing a place of work 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.

### GENDER

This commitment is further reflected in our IED Framework with targets to increase gender equality, including increasing women's representation in leadership roles to 40% by 2025, and strategies to foster greater representation through training, development and coaching. We continue to review all policies and procedures to ensure they are inclusive of our people. This included introducing a Family and Domestic Violence Leave Policy that gives our people 10 days of paid leave and five days of unpaid leave.

### ETHNICITY

In addition, we transferred all People and Performance Policies to Inghams' digital knowledge library and used the in-platform translation functionality to make them available in the top 10 languages spoken by our people. Making our policies, including those related to modern slavery, available in multiple languages reflects our commitment to ensuring that all workers, including those from culturally and linguistically diverse backgrounds, have access to and can more easily comprehend vital information. This helps create an environment where workers are informed of their rights and can report concerns, reducing the risk of exploitation.



### FIRST NATIONS ENGAGEMENT

A key goal for Inghams in FY24 was to launch a Reflect Reconciliation Action Plan (RAP) in Australia to support greater opportunities for First Nations peoples to thrive in our business and the community. Our First Nations engagement includes acknowledging days of recognition including National Reconciliation Week and NAIDOC Week in Australia, and celebrating Mataraki in New Zealand, which marks the start of the Maori New Year.

### LGBTQ+

We've updated all of our People and Performance Policies for gender neutrality and, where applicable, LGBTQ+ inclusion as part of our ongoing membership with ACON (the AIDS Council of NSW).



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.

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