

Modern Slavery Statement

For the financial year ending 30 June 2025



HARVEST
— R O A D —
Harvest Road Group Pty Ltd



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Summary of Our Response to the Modern Slavery Act 2018 (cth)

Criteria	Description	Reference in this Statement
Identify the reporting entity (S16 (1) (a))	Harvest Road Group Pty Ltd	Approval & Our Structure – page 5
Describe the structure, operations and supply chains of the reporting entity (s16 (1) (a) – (b))	Harvest Road Group is an Australian agrifoods business that produces high-quality food sold under the Harvey Beef, Leeuwin Coast and other associated brands for domestic and international markets. Our products are exported to more than 20 different countries. The company is owned by Tattarang Pty Ltd.	Approval & Our Structure – page 5 Our Operations & Supply Chains – page 7
Describe the risk of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls (s16 (1) (c))	Harvest Road Group has identified the following modern slavery risks in its operations and supply chains: <ul style="list-style-type: none">• Australian beef cattle supply chain.• Seasonal and migrant workers.• Solar panel, uniforms and electronics procurement.	Our Modern Slavery Risks (Supply Chain Risks & Operational Risks) – page 10 to 12
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes (s16 (1) (d))	Modern slavery screening processes for new and existing suppliers consisted of: <ul style="list-style-type: none">• Issuing Self-Assessment Questionnaires (SAQs) to high risk suppliers.• Engaged with suppliers to ensure issues are understood and to drive continual improvement.• Undertook an internal audit on the recruitment process for migrant workers.• Incorporated modern slavery considerations in terms and request for proposals.• Provided employees with internal education and modern slavery training.	Risk Management & Assessment – page 15 Supplier Engagement, Corrective Action & Remedy – page 16 Due Diligence & Actions Undertaken – page 17

Criteria	Description	Reference in this Statement
Describe how the reporting entity assesses the effectiveness of such action (s16 (1) (e))	To ensure consistency between reporting periods, progress against our commitments are set out in the ‘measuring effectiveness framework’ and our ‘future commitments’ provide a clear roadmap for the next reporting period.	Measuring Effectiveness and Our Future Commitments – page 24
Describe the process of consultation with any entities that the reporting entity owns or controls (s16 (1) (f))	Engagement across all entities for consistent modern slavery approach, including oversight by the Board of Directors and Chief Executive Officer.	Approval & Our Structure – page 5 Consultation with Owned & Controlled Entities – page 27



Introduction

Harvest Road Group is pleased to present our fourth Modern Slavery Statement, covering the financial year ending 30 June 2025. Our commitment to continuous improvement in identifying and addressing modern slavery risks remains unwavering across our integrated cattle & beef, aquaculture and horticulture businesses and their supply chains. We recognise that modern slavery risks are constantly evolving, and we are dedicated to strengthening our mitigation strategies and seeking new opportunities to address these challenges.


Over the past year, we achieved important milestones that demonstrate our proactive approach. We applied best practice due diligence processes, including a thorough ethical recruitment audit at our processing facility to ensure migrant workers are recruited fairly and without exploitation. We enhanced supplier screening by adopting the Sedex platform, introducing stricter thresholds for high-risk suppliers, and issuing Self-Assessment Questionnaires (SAQs). This enhanced screening and engagement via Sedex has improved transparency with our suppliers and driven continual improvement in addressing any risks. We also embedded rigorous modern slavery criteria into our tender processes for major contracts, requiring all bidders to meet our ethical standards and incorporating these considerations into contract award decisions. These actions, from supplier due diligence to ethical recruitment and procurement, reflect our unwavering commitment to ethical sourcing and modern slavery risk mitigation.

In last year's Statement, we set out key areas of focus for this reporting period. I am pleased to report that

we have made strong progress on those commitments, reinforcing Harvest Road Group's position in combating modern slavery. For example, during our business simplification process we reviewed our historical suppliers and engaged with those who had previously not been screened. In addition, we completed the internal audit of our migrant worker program at our processing facility and rolled out internal training and awareness initiatives, further bolstering our governance framework. These achievements underscore our determination to continually improve, and I remain committed to further development as we move into FY26.

Looking ahead, we pledge to deepen our collaboration with suppliers, operational stakeholders, and partners, to drive collective action against modern slavery. In addition, Harvest Road Group is ultimately 100% owned by Tattarang Pty Ltd and, as part of this ownership structure, actively participates in the Tattarang Modern Slavery Working Group to ensure alignment with group-wide ethical sourcing and governance initiatives.

By enhancing transparency and traceability throughout our operations and supply chains, we aim to further strengthen our response to modern slavery risks in our day-to-day activities at Harvest Road Group. We will continue to embrace continuous improvement, regularly reviewing our strategies and seeking innovative ways to mitigate emerging risks.



Harvey Gaynor
CEO, Harvest Road Group

Identify the Reporting Entity

Approval & Our Structure

This Modern Slavery Statement ("**Statement**") is published on behalf of Harvest Road Group Pty Ltd (ACN 169 138 014) and its owned and controlled entities (referred to collectively in this Statement as "**we**", "**us**", "**our**" and "**Harvest Road Group**", unless the context requires differentiation of individual entities), to meet the reporting requirements under the Modern Slavery Act 2018 (Cth) ("**the Act**") for the year ended 30 June 2025.

Harvest Road Group's wholly owned subsidiaries, Harvey Industries Group Pty Ltd (ACN 117 597 985) and Harvest Road Agribusiness Pty Ltd (formerly Koojan Downs Pty Ltd) (ACN 628 244 628), each met the Act's annual revenue threshold for the reporting period (FY24–25). Accordingly, this is a joint Statement on behalf of three reporting entities: Harvest Road Group Pty Ltd, Harvey Industries Group Pty Ltd, and Harvest Road Agribusiness Pty Ltd.

This joint Statement sets out details of operations across Harvest Road Group, its supply chains, and the measures taken to address risks of modern slavery, in line with the Commonwealth Guidance for Reporting Entities.

This Statement addresses the activities of Harvest Road Group Pty Ltd, Harvey Industries Group Pty Ltd, Harvest Road Agribusiness Pty Ltd, and other controlled entities within Harvest Road Group that are not reporting entities in their own right.

These controlled entities include:

- Harvest Road Pastoral Pty Ltd (ACN 619 252 621)
- Harvest Road Breeding Pty Ltd (ABN 75 655 624 212)
- Harvest Road Oceans Pty Ltd (ACN 165 170 445)
- Harvest Road Management Services Pty Ltd (ACN 652 232 847)

Consultation and engagement across Harvest Road Group has occurred in the preparation of this Statement, as well as in relation to Harvest Road Group's modern slavery response more broadly. This involved communications with key representatives from the Group's business operations and leadership team.

The Board's of Harvest Road Group Pty Ltd, Harvey Industries Group Pty Ltd, and Harvest Road Agribusiness Pty Ltd approved this Statement on 18 December 2025.

This Statement is signed by John Hartman, who is a director of Harvest Road Group, the parent entity, for all entities covered by this joint Statement pursuant to section 14(2)(e) of the Act.



John Hartman
Director,
Harvest Road Group Pty Ltd

You can download last year's modern slavery Statement [here](#)

Our Values and Commitment to Ending Modern Slavery

At Harvest Road Group, our 10 values are at the heart of everything we do. They drive our culture and philosophy and underpin our approach to conducting business.

We remain committed to acting ethically and with integrity across all aspects of our business. We strive to uphold and protect the rights of all of those who work for, and on behalf of the Harvest Road Group. We are also committed to protecting

and respecting the rights of people who may be impacted by our activities, including those in our supply chains.

We acknowledge the risk of modern slavery occurring in our own operations and supply chain and continue to focus on implementing and continuously improving effective systems and processes to address these risks.

Our Values

Courage & Determination

NEGU – we never ever give up

Generating Ideas

Always be on the lookout for breakthroughs

Empowerment

Go to your leader for advice, not permission

Humility

Be vulnerable, take risks to trust others

Enthusiasm

Be the most positive person in the room

Integrity

Do what you say you're going to do

Family

Support each other, always be kind

Safety

Look out for your mates and yourself

Frugality

Think of ways we can do things better, faster, cheaper, safer

Stretch targets

Always be uncomfortable with your level of challenge

Our Operations and Supply Chains

Who We Are

Harvest Road Group is a family-owned, proud West Australian integrated cattle & beef, aquaculture, and horticulture business. Harvest Road Group's vision is to deliver Australia's best sustainable produce to the world. We strive to make a positive impact on our people, communities and partners.

Our Operations

Agribusiness

Our Agribusiness manages cattle breeding, back-grounding and feeding operations across six pastoral aggregations, three farming properties and a feedlot – spanning the Kimberley, Pilbara, Gascoyne and Midwest regions of Western Australia. In addition, we have a horticulture business based near Carnarvon. Our Agribusinesses' operations are highly seasonal and in addition to our full-time workforce we also utilise seasonal workers and contractors during peak periods throughout the year.

Beef Processing

Our beef processing facility in Harvey is located 140km south of Perth. We procure livestock from a network of suppliers spanning Western Australia

including from our own Agribusiness. Our workforce comprises over 1,000 employees, including migrant workers from Philippines who are employed under a Meat Industry Labour Agreement and from the Pacific Islands who are employed under the Pacific Australia Labour Mobility (PALM) Scheme.

We have a dedicated procurement team responsible for coordinating and sourcing for the beef processing facility, including engineering parts, uniforms, and packaging.

Our beef products are sold domestically and internationally, exported to over 20 different countries.

Aquaculture

Our aquaculture leases are based off the coast of Albany, 450km south of Perth. The aquaculture operations span nursery, spat deployment, on-water grow out, harvesting and grading. Our aquaculture products are primarily sold domestically.

Major procurement categories within the aquaculture business include construction services and materials, plant and equipment, water farming infrastructure (baskets, buoys, ropes and anchors etc) and third-party processing services.



Our Employees

During this reporting period, Harvest Road Group employed a total of 1,521 people.

The breakdown of employment types is set out below. It included 1,026 full-time employees (comprising 67% of all employees), 21 part-time employees, 25 fixed term contracted employees and 449 casual staff. The table below details the employment type and the employing entity.

All our staff are employed in strict compliance with local laws and regulations. Our Australian terms and conditions of employment are underpinned by the Fair Work Act 2009 (Cth) and the National Employment Standards (NES).

In relation to the contracted labour hire workers, we ensure strict compliance with the NES.

For example, the following minimum terms are set out in all employee and labour hire worker contracts and communicated clearly:

- Hours of work;
- Remuneration;
- Leave entitlements, including annual leave, public holidays, parental leave, compassionate leave, personal/carer's leave, community leave, jury service leave, family and domestic violence leave;
- Benefits; and
- Notice period.

All of our employees are paid at or above the minimum wage.

Entity	Total	Full-time (or equivalent)	Part-time	Casual	Fixed term contract	Other features
Harvest Road Group Pty Ltd	76	72	4	0	0	8 migrant workers
Harvey Industries Group Pty Ltd	1,217	799	11	407	0	790 migrant workers
Harvest Road Agribusiness Pty Ltd	173	113	5	32	23	22 migrant workers
Harvest Road Oceans Pty Ltd	55	42	1	10	2	9 migrant workers
	1,521	1,026	21	449	25	

Our Supply Chains

During the reporting period, Harvest Road Group procured from 1,820 direct suppliers in the first tier of our supply chain, being those suppliers that we have a direct contractual relationship with ("Tier One Suppliers").

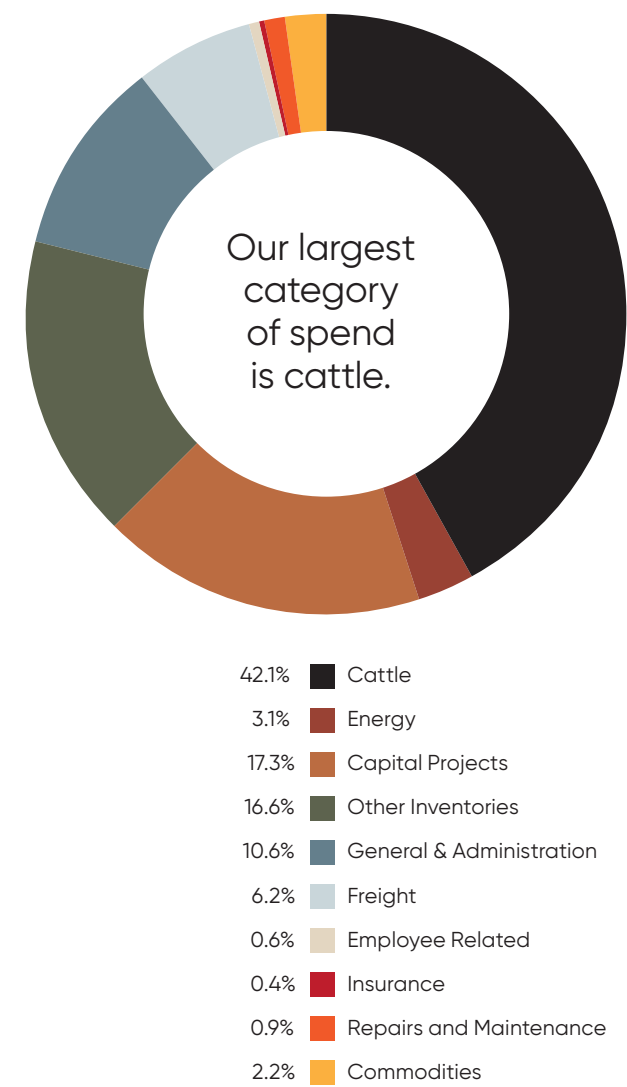
All new suppliers with Harvest Road Group are assessed for modern slavery risk prior to onboarding and are required to agree to our Supplier Code of Conduct. A full description of our risk management and assessment procedures are set out on page 17 of this Statement.

We understand the complexities of global supply chains including our Tier One Suppliers, and the fact that many products purchased from local

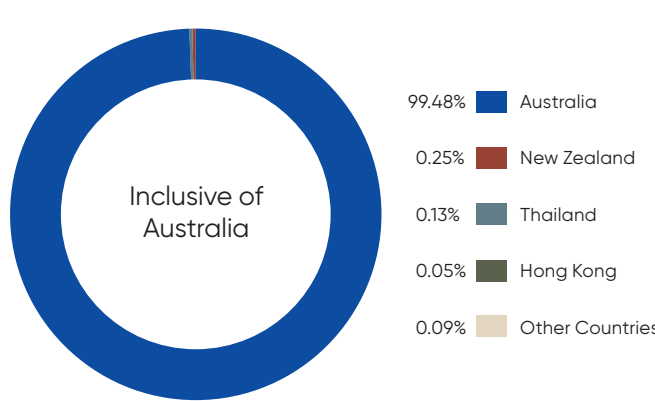
companies are either manufactured overseas or incorporate significant components from abroad.

To provide a clear view of our supply chain composition, we have presented our supplier spend data from two perspectives: inclusive of Australia and exclusive of Australia. The inclusive view, which encompasses all Tier One procurement, underscores that nearly our entire supplier spend (approximately 99.5%) occurs domestically in Australia. This highlights the context that our direct procurement is overwhelmingly Australia-centric where regulatory oversight is strong. In contrast, the exclusive view (which looks at the breakdown of the ~0.5% overseas spend alone) sheds light on where our international procurement is concentrated. New Zealand accounts for nearly half of that overseas spend, at about 49% of the non-Australian portion, followed by Thailand (~26%), Hong Kong (~10%), the United States

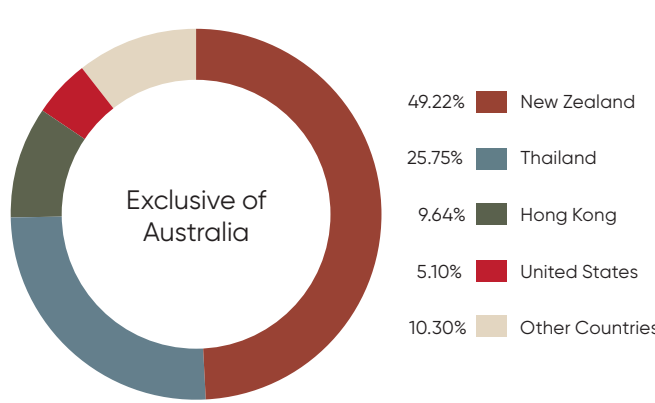
Spend by Category (excluding labour)



Spend by Country



Spend by Country (excluding Australia)



(~5%), and several other countries collectively making up the remaining ~10%. We have included both views because each tells an important story: the inclusive view demonstrates how heavily weighted our procurement is towards Australia, while the exclusive view highlights the specific countries to which our limited overseas spending is directed.

Harvest Road Group recognises that while we manage risks among our Tier One Suppliers (direct suppliers), many modern slavery risks can reside further down in Tier Two and Tier Three of our supply chain, where we have less direct visibility. Focusing only on the first-tier relationships provides a partial view of our risk exposure, since many products we source domestically include components or materials from overseas suppliers. For example, categories like uniforms, electronics, and solar panels, which we may purchase via Australian

vendors, often involve manufacturing in higher-risk countries beyond our immediate network. We acknowledge that these deeper supply chain layers (Tier Two, Tier Three) may carry significant modern slavery risks that are not evident from Tier One Suppliers alone.

To strengthen our oversight beyond Tier One, Harvest Road Group is setting a clear ambition for FY26: we will map out two to three key Tier Two supply chains in high-risk categories. This means selecting suppliers of our Tier One and tracing their supply chain upstream to evaluate labour practices at the next tier. This initiative will give us greater transparency into the origins of important products and allow us to work more closely with those upstream suppliers on mitigating risks.

Our Modern Slavery Risks

Harvest Road Group has identified several areas in our operations and supply chains where the risk of modern slavery may be elevated. These include: (1) certain higher risk supply chain categories (notably our Australian beef cattle supply chain, and procurement of solar panels, uniforms, and electronics) and (2) vulnerable worker populations in our operations (specifically seasonal horticulture workers and migrant workers in our beef processing facility). We outline these risk areas below, along with context on how we addressed them:

Operational Risks

Harvest Road's diverse agrifood operations spanning beef processing, aquaculture, horticulture and pastoral operations; present several key operational risks related to modern slavery. The most significant risks include: (1) the potential exploitation of migrant workers employed in our beef processing and pastoral operations; and (2) the reliance on seasonal and contract labour in horticulture and other agricultural activities, often via third-party labour hire arrangements.

- **Migrant workers in the beef processing facility:**

A substantial portion of our operational workforce consists of migrant workers, particularly at our beef processing facility (which employs over 1,000 staff, including migrants from Pacific Island nations under the PALM scheme and the Philippines under a Meat Industry Labour Agreement), as well as smaller numbers on remote pastoral properties. These workers are vital to our business, but

they can be more vulnerable to modern slavery practices due to factors like language barriers, reliance on employer-sponsored visas, and limited local support networks.

Recognising the vulnerability of migrant workers to exploitation, we proactively conducted an internal audit of our migrant recruitment process during FY25. This audit, led by our People & Culture team with support from the Modern Slavery Working Group, closely examined the journey of 19 Filipino workers recruited in the period. A full description of due diligence activities undertaken is set out on page 19.

- **Seasonal Labour and Labour Hire in Horticulture:**

Harvest Road's agribusiness and horticulture activities are highly seasonal, requiring additional short-term workers during peak planting or harvest periods. To meet these needs, we engage seasonal workers through a labour hire firm. This practice carries a modern slavery risk because outsourced or temporary labour workforces have historically been prone to exploitation in agriculture.

We manage this risk by exercising strong controls over labour hire engagements. All labour hire providers must be formally contracted and vetted for ethical employment practices. We require them to comply fully with Australian workplace laws and our own Supplier Code of Conduct. Internally, we have developed our governance for seasonal worker engagement in horticulture to include direct oversight of labour hire conditions and regular onsite audits.

Supply Chain Risks

To identify modern slavery risks in our supply chains, Harvest Road Group conducts modern slavery risk assessments of our suppliers to identify risks based on the industry and country of those suppliers.

Harvest Road Group conducts regular assessments of our supply chains to identify potential modern slavery risks. In prior years we leveraged an external multi-tier analysis (MRIO model) to map risk deep into our supply chain. This highlighted that our Australian beef cattle supply chain carries the highest potential risk exposure, given inherent risks in agriculture and meat processing combined with the scale of that supply chain for our business. Notably, the analysis indicated these risks are most concentrated upstream close to our Tier One Suppliers (e.g. on cattle stations or feedlots supplying to us). These suppliers represent high-spend, high-risk categories for our business. The nature of farming and harvesting in these supply chains – ranging from cattle stations and feedlots to grain production – carries inherent labour rights risks, such as the potential for exploitation of farm workers. Accordingly, Agricultural Supply Chains (Cattle & Grain) have been explicitly recognised as a key modern slavery risk area for Harvest Road Group. In FY26 we plan to strengthen oversight of these suppliers through enhanced due diligence and engagement to mitigate the elevated risk of modern slavery in these high-volume supply streams.

Other supply chain areas we monitor for heightened risk include:

- **Capital Projects:** Harvest Road Group has integrated modern slavery due diligence

measures into its tendering process for major capital projects. In FY25, all suppliers bidding on large projects were required to comply with comprehensive anti-slavery criteria and contractual clauses, and their modern slavery practices were formally evaluated as part of the tender award scoring. This case study outlines the actions taken during the tender process and the improvements identified. It demonstrates Harvest Road's commitment to ethical sourcing and continuous improvement in mitigating modern slavery risks. A full description of due diligence activities undertaken is set out on page 19.

- **Solar Panel procurement:** Solar panels have well documented risk of forced labour in their international supply chains. We look to procure solar panels as part of our efforts to decarbonise our operations for use as electricity generation on our stations. Unfortunately, we have had difficulty finding a panel supplier that has visibility and traceability of the panel manufacture back to the mine site and conditions that the polysilicon was sourced. We will continue to pursue this and hope to include details of successful procurement in our next modern slavery update.

Overall, while about 99% of our Tier One Suppliers (by spend) are Australian based, we remain mindful that many goods sourced locally have global inputs. This understanding drives us to maintain risk assessment processes to identify and address any modern slavery risks throughout our multi-tier supply chain, whether they arise on a farm in Western Australia or in a factory overseas.



Assessing & Addressing Modern Slavery Risks

Harvest Road Group’s Modern Slavery Risk Management Framework (“Modern Slavery Framework”) guides our approach to limiting the risk of modern slavery practices in our supply chain. It comprises four key areas of focus:

Governance

A framework of policies and contractual arrangements that embed our values in the way we operate.

Risk Management

Undertaking due diligence to assess how goods and services in our supply chain are managed and produced, ensuring ethical recruitment and treatment of migrant workers.

Continuous Supplier Engagement, Corrective Action and Remedy

Engaging with suppliers to better understand and support their efforts to combat slavery.

Training and Collaboration

Raising awareness of modern slavery issues, both internally and through active collaboration with suppliers and external stakeholders.

Our approach to each area is set out over the subsequent pages.

Our Governance Framework

Harvest Road Group’s Board of Directors provide oversight of the management of our modern slavery risks.

To support the management of our modern slavery risk and response, Harvest Road Group has a suite of internal policies and procedures which are listed and described below. All translated documents are stored on the Employee Self Service (ESS) system, which employees can access any time. A multilingual whistleblower hotline remains prominently featured on numerous electronic display screens within the beef processing facility. These screens showcase the hotline information in a total of four commonly used languages by our workforce.

Policy or Procedure	Purpose
Code of Conduct	<p>The Code of Conduct includes our commitment to respect the human rights of all people, including employees, partners and the people in communities in which we operate. Our Code of Conduct prohibits all forms of modern slavery.</p> <p>The Code of Conduct is translated into Indonesian, Korean, Chinese, Tagalog and Bislama – languages spoken by workers at our beef processing facility.</p>
Modern Slavery Policy	<p>The Modern Slavery Policy outlines our commitment to ending all forms of modern slavery in our operations and the operations of our suppliers.</p> <p>The core principles are informed by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the ILO Core Conventions on Labour Standards and the United Nations Global Compact:</p> <ul style="list-style-type: none">• Every worker should have freedom of movement;• No worker should pay for a job;• No worker should be indebted or coerced to work, nor subject to threats or abuse;• Workers should be paid fairly for the work they do;• No child labour;• Respect rights of workers to freedom of association; and• Workers should have access to an operational-level grievance mechanism. <p>The principals of the Modern Slavery Policy extend not only to our employees, but also how we engage with, collaborate with our external suppliers and contracting workforce.</p>
Procurement Policy	<p>Our ethical procurement practices are outlined in the Procurement Policy, including the process for identifying, assessing and addressing modern slavery risk throughout the procurement process. We are currently updating this policy and will continue to strengthen the modern slavery requirements and procedures.</p>
Purchase Order Terms	<p>Our Purchase Order Terms include terms and conditions that specifically address modern slavery risks.</p> <p>The key terms of the Purchase Order Terms which address modern slavery risks include:</p>

Policy or Procedure	Purpose
Purchase Order Terms <i>(continued)</i>	<ul style="list-style-type: none">Each supplier warrants that steps have been taken by them to identify and address modern slavery in their own operations and supply chain. This specifically includes an appropriate grievance mechanism consistent with the criteria set out in the United Nations' Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy Framework."Each supplier warrants that if they suspect or become aware of modern slavery risk in their operations and supply chains, they must take all reasonable action to address or prevent these practices, including remediation and disclosure of the instance to us.Each supplier is prohibited from requiring any personnel from paying recruitment (or related) fees to secure employment and is prohibited from possessing the original of any workers personal identification documents.
Recruitment and Selection Procedure	Harvest Road Group's staff recruitment and selection procedures support management and staff to appoint the most capable people to roles across the business. To address modern slavery risk factors, we ensure that international guidelines and local legislation in relation to minimum working age is adhered to.
Supplier Code of Conduct	Our Supplier Code of Conduct outlines our expectations of suppliers and their conduct regarding the core principles listed in our Modern Slavery Policy. This includes workplace health and safety, environmental protection and ethical practices. We expect suppliers to investigate their labour practices and supply chains and promptly address any cases of modern slavery or related exploitation and report these to us. This also includes the expectation that suppliers pay their workers fairly for the work they do and either pay or take steps towards paying workers a living wage.
The Whistleblower	Our Whistleblower Policy provides a practical tool for our stakeholders to disclose risk or wrongdoing in the workplace. It ensures that those who make disclosures will be protected and supported throughout the process.
Workplace Behaviour Policy	Our Workplace Behaviour Policy outlines the expected behaviour and requirement of all staff to treat others with dignity, courtesy and respect. The policy names unacceptable workplace conduct in line with legislation including the Australian Human Rights Commission Act 1986 (Cth).
Workplace Investigation Procedure	Applicable to both internal and external stakeholders, this procedure covers non-conformances, including any material breach of our modern slavery provisions, human rights violations or incidents of modern slavery.
Employee Grievance and Dispute Resolution Procedure	This procedure outlines a fair and transparent process for resolving work-related concerns raised by employees about behaviours or decisions. The process includes steps for raising grievances, investigation protocols, and responsibilities for employees and leaders to maintain respectful working relationships without victimisation.

Modern slavery working group
Harvest Road Group has a Modern Slavery Working Group, which includes staff from our Operations, ESG, People & Culture, Legal and Finance teams and is sponsored by the Chief Financial Officer. The Modern Slavery Working Group supports and facilitates our modern slavery actions across each of the operating businesses within Harvest Road Group and ensures that all initiatives to address modern slavery are effectively implemented.

Risk Management and Assessment

Pre-contract supplier screening for modern slavery risk
As part of our ongoing due diligence, we adopt a pre-contract supplier screening process across all Harvest Road Group business units. New prospective suppliers are screened to assess the inherent modern slavery risk based on the product/ service and geography. The screening process has been enhanced to ensure that staff specifically trained to review modern slavery risks review all prospective supplier applications. Suppliers must also adhere to our Supplier Code of Conduct. If there is an elevated inherent risk, the prospective suppliers are required to complete a Self-Assessment Questionnaire (SAQ) which requests information in the following key areas:

- Risk identification and assessment;
- Education and training;
- Policies and procedures;
- Grievance mechanism;
- Due diligence;
- Measuring effectiveness; and
- Remediation.

Existing supplier's inherent risk assessment
During the reporting period we transitioned to the Sedex platform. As a Sedex member we utilise their

risk assessment tools and review our entire active supplier list on a quarterly basis through the Sedex platform.

As part of this review Sedex provides risk ratings and flags to enable Harvest Road to identify new or increasing modern slavery risks within our Tier One Suppliers. For suppliers that pose an elevated risk, Harvest Road will either access existing SAQ's from the Sedex network or directly request an SAQ to be completed by the supplier.

Additionally, during 2025, Harvest Road Group undertook an entity simplification project, consolidating supplier accounts from multiple subsidiaries in the agribusiness division into a single agribusiness entity, Harvest Road Agribusiness Pty Ltd. As part of this initiative, the project steering committee elected to request updated supplier application forms from over 400 existing suppliers, notwithstanding that many of these accounts did not require formal contract novation or re-onboarding.

This proactive decision reflected our commitment to maintaining robust governance and transparency across our supply chain. It enabled us to capture updated supplier information, reaffirm supplier alignment with our Supplier Code of Conduct, and reassess inherent modern slavery risks. As a direct outcome of this approach, an additional 128 suppliers were screened for modern slavery risk, resulting in the issuance of nine Self-Assessment Questionnaires (SAQs) to suppliers identified as higher risk.

Further we expanded our assessment net for existing suppliers by sampling some medium-risk suppliers with higher spend for SAQs, in line with our commitment to continuously improve coverage.



Supplier Engagement, Corrective Action and Remedy

To provide transparency and insights into our supplier engagement efforts, a breakdown of supplier engagement, actions, and remedies is provided below.

Pre-contract supplier engagement

All new suppliers on-boarded during the reporting period were required to complete a new supplier form which contained a set of questions relating to types of goods and services being supplied, the origin of the goods and services, their agreeance to the Code of Conduct and the existence of any policies that addressed their commitment to reducing modern slavery risks. Any potential suppliers identified as having a higher inherent risk, were issued with an SAQ for completion to understand what actions they were taking to manage the risk.

Existing supplier engagement

All existing suppliers were subject to a periodic review in Sedex for the purpose of risk assessment. SAQ's were requested from suppliers based on the inherent risk rating from Sedex and/or their materiality within our Supply Chain.

Legacy suppliers identified during our entity simplification project were requested to resubmit supplier onboarding forms to allow us to perform a screening process. Suppliers identified with an inherent high risk were issued with SAQ's.

Any completed SAQ's that provide insufficient comfort around modern slavery risks are subject to additional due diligence activities including follow-up through email communication, management interviews, desktop audits, and on-site audits where necessary.

Type	Total	Action	Comment
Number of Existing Suppliers	1498	Assessed for inherent risk through Sedex tool	57 Suppliers identified as having High Inherent Risk, either from industry risk, country risk or materiality.
Number of New Suppliers	322	Pre-Contract Screening and assessed for inherent risk through Sedex tool	No supplier account is accepted without pre-screening and/or satisfactory SAQ response
Number of Suppliers with High Inherent Risk or Materiality	57	Suppliers sent SAQ's	HRG actively following up on any non-response.
Number of Suppliers Require Further Due Diligence post SAQ	0		



Due Diligence and Actions Undertaken

Given the potential elevated risk of modern slavery in industries in which Harvest Road Group operates, we recognise the importance of effectively addressing those risks and continually improving our overall modern slavery response.

Case study: Ethical Recruitment of Migrant Workers

Our beef processing division has long relied on international recruits to fill skilled and general hand roles. Recognising the vulnerability of migrant workers to exploitation, we proactively conducted an internal audit of our migrant recruitment process during FY25. This audit, led by our People & Culture team with support from the Modern Slavery Working Group, closely examined the journey of 19 Filipino workers recruited to the processing facility in the period.

• Direct oversight of recruitment:

Our Chief People Officer personally leads in-country recruitment drives. In 2025, our team travelled to the Philippines to interview candidates face-to-face. This direct involvement ensures transparency (candidates heard employment terms and conditions straight from us) and allows immediate clarification of any questions or concerns. It also helps us build trust with candidates from the outset. In addition to our own recruitment, we engaged a reputable local recruitment agency to assist. We vetted this agency thoroughly: it was required to be officially licensed by the Philippine Government and the Philippine Overseas Labor Office (POLO), and to sign a contract agreeing to our Code of Conduct. These measures help facilitate a transparent and ethical recruitment process, whilst ensuring all practices remain within legal and ethical guidelines.

• No recruitment fees or deposits:

Interviews with the Filipino workers confirmed that none of them paid any fees, deposits, or other illegal charges to secure their employment. This is a critical point, charging recruitment fees is a common driver of debt bondage. Our policy is that workers should never pay to obtain employment with us.

• Transparent employment contracts:

Every migrant worker was provided a written employment contract in English, and we ensured these were understood by having a translator present. These contracts clearly detail their wages, standard and overtime hours, leave entitlements, housing arrangements (if company-



provided), and conditions for resignation or termination.

• Retention of identity documents:

It is our strict practice that while we collect copies of identification documents for HR records (passport, IDs, visas, etc.), the original documents remain with the workers at all times. Physical copies of these documents are not retained by us or the recruitment agencies. This practice ensures that workers maintain control over their original documents, which is an important measure to prevent potential exploitation or coercion.

• Comprehensive induction and accessible grievance mechanisms:

Upon commencing work, all migrant workers undergo an induction which covers not just job training and safety, but also their rights, workplace policies, and how to get help or raise issues. This includes a briefing (with translation as needed) on our grievance procedures and whistleblower hotline. We have made these procedures readily available on our Employee Self-Service (ESS) portal and intranet, which the workers are shown how to access during induction. They also sign an acknowledgement that they have received and understood our key policies. Nonetheless, the audit noted an opportunity to further reinforce the whistleblower mechanism. To enhance accessibility and confidentiality, the team is exploring introducing a QR code that directs workers to the whistleblower hotline or feedback form. This initiative is currently under consideration for future system updates.

Due Diligence and Actions Undertaken

- **Fair pay and conditions in practice:**

The workers interviewed confirmed that their payslips accurately reflect their entitlements, including hours worked, hourly rates, leave accruals, and overtime. There were no reports of discrepancies or issues related to payments or entitlements, indicating that we maintain transparent and fair remuneration practices in line with ethical standards.

- **Safety:**

We ensure that all workers are provided with the necessary personal protective equipment (PPE) and receive job-specific training to comply with safety regulations. The company regularly updates training programs to meet the evolving needs of different work areas, promoting both safety and workplace efficiency.

- **Continuous improvement:**

While the audit concluded that our recruitment practices for migrant workers are ethical and effective, it also identified a few areas to further strengthen to stay ahead of any risks. The three main improvement actions we have committed to are:

1. Developing a formal Recruitment Agency Code of Conduct to reinforce our expectations with all overseas recruitment partners (essentially codifying the best practices we already enforce, such as no-fee recruitment, legal compliance, respect for candidates' rights);
2. Enhancing our pre-departure orientation for migrant hires – providing more information to workers before they leave their home country about working in Australia, their rights, and who to contact with any issues. This helps set expectations and empower workers upfront; and
3. Increasing internal audits and monitoring: a recent Sedex audit at Harvey Beef suggested that more frequent internal checks would be beneficial. In response, our Modern Slavery Working Group will conduct periodic internal audits of recruitment records and worker feedback, to ensure ongoing compliance and to catch any potential issues early. These steps will be implemented in the coming year, building on the solid foundation verified by this audit.

In summary, this case study reassured us that our migrant workforce is being treated fairly and recruited ethically, in line with international best practices. Workers at our processing facility reported no indications of modern slavery or exploitation; they have freedom of movement, awareness of their rights, and decent working conditions. By implementing the additional improvements identified, we aim to maintain this high standard and continue positioning Harvest Road Group as a leader in ethical recruitment and employment of migrant workers.

Case Study: Harvest Road Group's Tender Process

Harvest Road Group has integrated modern slavery due diligence measures into its tendering process for major capital projects. In FY25, all suppliers bidding on large projects were required to comply with comprehensive anti-slavery criteria and contractual clauses, and their modern slavery practices were formally evaluated as part of the tender award scoring. This case study outlines the actions taken during the tender process and the improvements identified. It demonstrates Harvest Road Group's commitment to ethical sourcing and continuous improvement in mitigating modern slavery risks.

Embedding Modern Slavery Criteria in the Tender Process

Harvest Road Group undertook a post-mortem review of two recent tender processes for large capital projects to ensure modern slavery risks were effectively addressed. The Request for Tender (RFT) documentation for all participating suppliers included explicit requirements and tools to assess their modern slavery risk management. These included:

- **Code of Conduct:**

Harvest Road's Code of Conduct, setting ethical expectations for suppliers.

- **ESG Questionnaire:**

An Environmental, Social and Governance questionnaire, covering social responsibility topics.

- **Modern Slavery Contract Clauses:**

Mandatory contract clauses obliging compliance with Harvest Road Group's modern slavery practices.

- **Returnable Schedules:**

Forms requiring disclosure of the source and country of origin of goods and services to trace supply chains.

- **Detailed Self-Assessment Questionnaire (SAQ):**

A comprehensive SAQ on modern slavery practices in labour and procurement, which suppliers had to complete.

All bidders had to complete every modern slavery-related section and agree to the modern slavery clauses as a condition of a valid tender. If any supplier failed to do so, they would be automatically disqualified from the tender. This strict requirement ensured that only vendors demonstrating a baseline commitment to addressing modern slavery could be considered.

Modern Slavery Performance Scoring:

Harvest Road Group embedded modern slavery considerations into its contract award criteria, reflecting best practice in ethical sourcing. Supplier responses on modern slavery were formally evaluated, contributing 5% of the total tender evaluation score. In the reviewed tenders, vendors' modern slavery scores ranged from 1% to 4% out of the 5% available. All participating suppliers had provided documentation of their own policies and processes to prevent modern slavery, which were factored into the scoring. The relatively modest score range suggests that while suppliers met

Harvest Road's minimum requirements, there is room to further strengthen their modern slavery risk management.

Insight: Full compliance achieved, but improvement needed. The fact that 100% of bidders completed the required anti-slavery questionnaires and accepted the clauses meant Harvest Road Group could award contracts only to vetted, compliant partners. However, the low scoring (averaging around 2% – 3% out of 5%) highlighted that even compliant suppliers often have immature practices in this area. This finding provided a valuable baseline and reinforced the need to raise expectations and support suppliers in enhancing their modern slavery safeguards going forward.

Improvements and Future Actions in Due Diligence

The post-tender review identified opportunities to deepen the due diligence for future procurements. Harvest Road Group plans to enhance its RFT requirements to gain better insight into how suppliers manage modern slavery risks and to drive higher standards in the next round of tenders. In upcoming RFTs, the company is considering adding provisions that ask bidders to:

- **Audit and Reporting Systems:**

Explain how they establish and monitor systems for regular audits, management reviews, and progress reporting on modern slavery issues.





- **Ongoing Risk Monitoring:**
Describe their processes for continuously monitoring and reassessing modern slavery risks, the effectiveness of their strategies, and how they adapt to changes in operations, supply chains, or external risk factors.
- **High-Risk Identification:**
Outline methods for identifying areas of high risk within their operations and supply chains (e.g., particular regions, commodities, or tiers of suppliers that may be prone to labour exploitation).
- **Key Performance Indicators:**
Specify any key performance indicators (KPIs) they use to measure the effectiveness of their anti-slavery efforts; for example, supplier audit completion rates, training hours, or remediation outcomes.
- **Supplier Engagement and Collaboration:**
Describe how they engage with their own suppliers and stakeholders to raise awareness, share best practices, and collaborate on initiatives to prevent and mitigate modern slavery in the supply chain.

These additional questions aim to encourage bidders to demonstrate a more proactive and comprehensive approach to managing modern slavery risk. They go beyond basic compliance, probing the maturity of the supplier's programmes, such as whether they carry out regular supplier audits, adapt to new risks, and work collaboratively to improve industry standards.

This approach will help drive better performance on modern slavery risk mitigation across its supply chain and ensure that ethical sourcing principles are maintained from the bidding process through the full contract lifecycle.

Conclusion and Continuous Improvement

Harvest Road Group's tender submission review demonstrates a strong, practical commitment to combating modern slavery in its supply chain. By embedding modern slavery considerations into procurement. From RFT documentation and evaluation scoring to contract clauses, the company has made ethical due diligence a built-in part of doing business with it. This proactive approach is in line with emerging best practices in procurement, where organisations integrate human rights criteria into supplier selection and management.

Looking ahead, Harvest Road Group recognises that modern slavery risks are not static and that its strategies must evolve. The initiatives for future tenders and contract management illustrate a cycle of reflection and improvement: the company is using lessons learned from current processes to set higher standards for tomorrow. In doing so, Harvest Road Group is fostering a culture of continuous improvement, an approach it explicitly embraces. By strengthening mitigation measures and seeking new ways to combat modern slavery, Harvest Road Group aims to stay ahead of emerging challenges and increase the effectiveness of its actions each year.

Training and Collaboration

Internal training and awareness

Building knowledge within our organisation is crucial to effectively combat modern slavery. In FY25 we continued to roll out training and improve awareness across various teams:

Staff training

We provide our staff with training to increase modern slavery awareness and improve efficiencies in modern slavery screening processes. In the reporting period, we:

- Continued to improve and update supplier forms and procedures for efficient supplier screening process.
- Provided an 'ESG Hub' intranet page, serving as central source for all staff to access, save all modern slavery documentation including supplier forms, procedures, and educational resources.
- Provided all new staff with a copy of the Modern Slavery Policy.
- Continued to provide online modern slavery training modules to all new staff at onboarding. The online training ensures all employees are familiar with specific provisions in relation to our Modern Slavery Policy and Code of Conduct.
- Continued to roll out refresher modern slavery training to existing staff.

Tattarang Modern Slavery Working Group Collaboration

Whilst Harvest Road Group manages its own modern slavery activities, we are also active representatives in the Tattarang Modern Slavery Working Group. The group meets quarterly to consider Tattarang's overall approach to modern slavery, including "end goals" of each business and streamlining processes to achieve specific objectives. As an active member we remain fully engaged on how we can continuously improve our approach to identifying, assessing and addressing modern slavery risks.



Remediation of Modern Slavery

During the FY25 reporting period, Harvest Road Group did not identify any instances of modern slavery in our operations or supply chains. Moreover, our due diligence did not reveal any major labour non-compliance issues that could serve as proxy indicators of hidden exploitation.

This outcome suggests that among our Tier One Suppliers (direct), no immediate remediation actions were triggered in FY25. Nevertheless, we recognise the pervasive nature of modern slavery in global supply chains and are fully dedicated to enhancing our risk identification and assessment processes. We acknowledge that focusing only on Tier One Suppliers provides a limited view of our risk exposure. Many modern slavery risks can reside further

upstream (Tier Two and Tier Three suppliers) where our visibility is lower. By expanding our due diligence, we aim to increase the likelihood of detecting and remedying modern slavery risks that might not be apparent from Tier One Suppliers alone.

Finally, we recognise that Harvest Road Group is a growing business, and we are expanding into new projects and partnerships. We are firmly committed to applying the same remediation standards and processes across any business expansions, new suppliers, or acquisitions. All entities under Harvest Road Group follow a consistent risk assessment and due diligence approach, which means any new operation we establish or new supplier we onboard will be subject to our modern slavery policies

If, in the future, we discover that Harvest Road Group has caused, contributed to, or is directly linked to an actual or suspected instance of modern slavery, we are fully committed to taking swift and effective remedial action. Our approach to remediation is designed to be worker-centric and solution-oriented, ensuring that any affected individuals are protected and any harm is appropriately remedied.

We will do this through the implementation of corrective action plans. Harvest Road Group has documented its approach to remediation of all incidents of actual or suspected nonconformance (including modern slavery concerns) ("Workplace Investigation Procedure"). This Workplace

Investigation Procedure covers non-conformances, including any material breach of our modern slavery provisions, human rights violations or incidents of modern slavery. In the case of a non-conformance, the incident would be reported to the relevant Group Leadership Team member.

No non-conformances in relation to modern slavery were identified during the reporting period. Our remediation process is supported by policies which clearly define the procedures undertaken internally to remedy harm.



Measuring Effectiveness and Our Future Commitments

Our Effectiveness

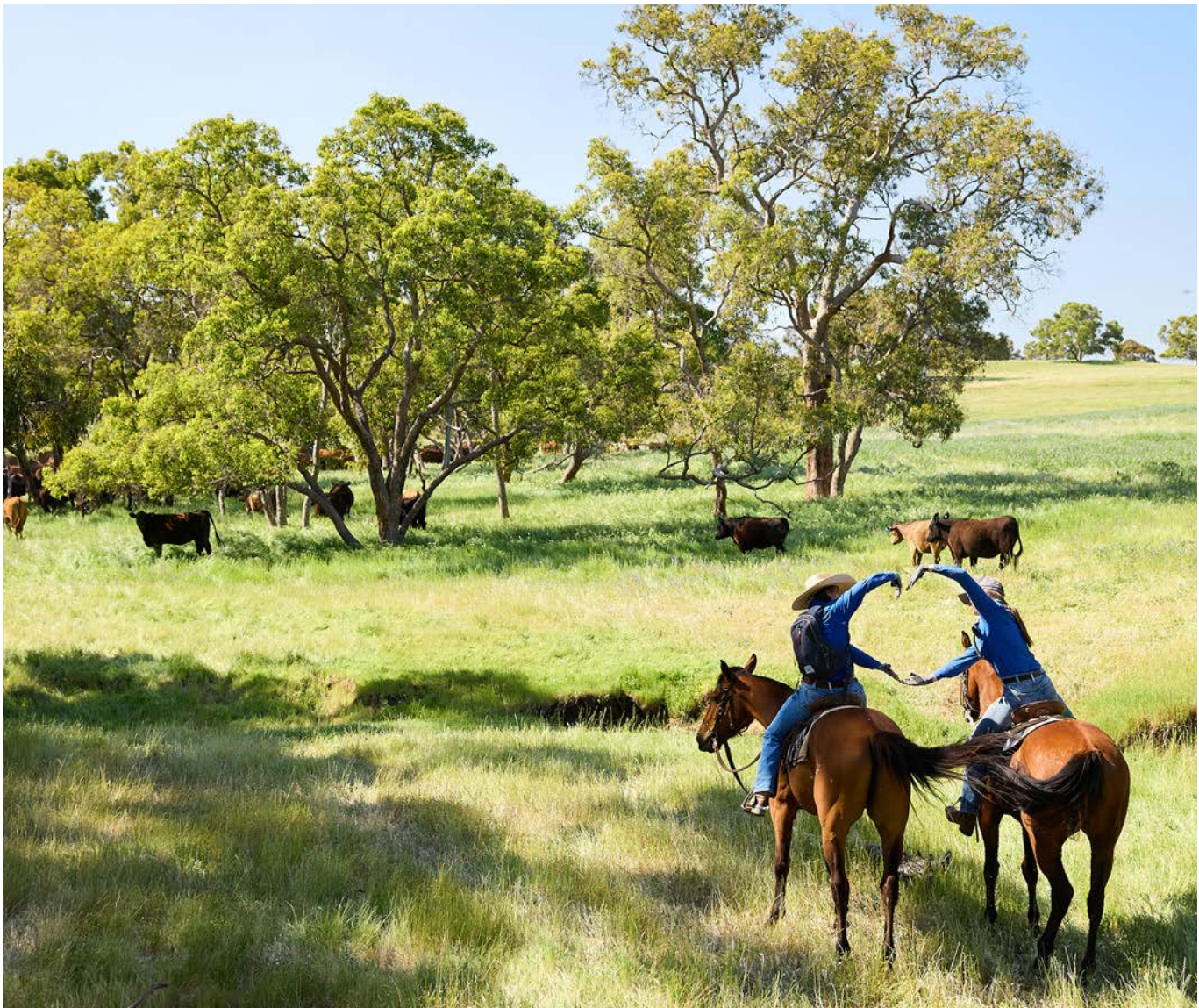
An important measure for transparency in our overall modern slavery response is ensuring continuity between reporting periods. This involves providing detailed information on the areas where we have successfully implemented key performance indicators (KPI's) and those where we are still working towards achieving them. During the reporting period, we determined our effectiveness in each

action based on whether we had completed the action or not, noted in the ('progress report').

However, we acknowledge the potential to improve our assessment framework by implementing targeted KPI's in the next reporting period. In our previous statement, we highlighted specific focus areas for this reporting period. The table below presents these focus areas, along with a progress report:

Area of focus	Improvement initiative	FY25 Update	Progress report
Governance	Develop targeted KPIs for each planned action for the next reporting period to enhance our assessment framework	<ul style="list-style-type: none">Preparatory work underway (KPI framework design in progress)	In Progress
Risk Assessment	Continue to assess modern slavery risk by screening prospective suppliers prior to onboarding and existing suppliers on a quarterly basis.	<ul style="list-style-type: none">100% of new suppliers were screened for modern slavery risk before onboardingAll existing suppliers (1,820 Tier One Suppliers) were assessed via Sedex.	Completed and ongoing
Risk Assessment	Conduct deeper due diligence on suppliers in high-risk supply chains.	<ul style="list-style-type: none">SAQs issued to all high-risk suppliers identified (57 in total, including all above a materiality threshold)Follow-ups conducted to achieve full response; no further red flags emerged.	Completed and ongoing
Supplier Engagement, Corrective Action and Remedy	Continue to engage with our suppliers and partners.	<ul style="list-style-type: none">SAQs issued to suppliers in high-risk categories (as noted above).Completed migrant worker recruitment audit for Harvey Beef operations (see case study on ethical recruitment)	Completed and ongoing

Area of focus	Improvement initiative	FY25 Update	Progress report
Supplier Engagement, Corrective Action and Remedy	Monitoring request for tender and proposal submissions and assessing alignment with modern slavery provisions.	<ul style="list-style-type: none">100% of tenders and major proposals included modern slavery criteria and were assessed for compliance (see case study on tender process)All awarded contracts in FY25 met our modern slavery requirements	Completed and ongoing
Training and Collaboration	Maintain modern slavery training at onboarding.	<ul style="list-style-type: none">Modern slavery training delivered to new staff upon induction, and refresher training provided to existing staff via online modulesActive participation in internal and Tattarang Modern Slavery Working Group continued	Complete and Ongoing



FY26 Commitments

For the next reporting period we aim to build on the foundations laid in this reporting period and focus on streamlining modern slavery processes across all Harvest Road Group businesses.

Area of impact	Planned action for next reporting period (2025/26)
Governance	Develop a robust KPI framework for each modern slavery action to strengthen our assessment of effectiveness and accountability.
Risk Assessment	Continue rigorous modern slavery risk screening for all new suppliers and conduct quarterly risk assessments of existing suppliers (using Sedex analytics and updates).
Risk Assessment	Undertake deeper due diligence (enhanced SAQs or audits) for suppliers in high-risk supply chains, ensuring any red flags are investigated and addressed promptly.
Risk Assessment – Agricultural Supply Chains	We will enhance our modern slavery risk screening and due diligence for agricultural suppliers (especially cattle and feed grain providers). This will include more frequent and rigorous assessments of these suppliers, such as targeted Self-Assessment Questionnaires or audits focusing on labour practices on farms and feedlots.
Deep-Dive Reviews of High-Risk Suppliers	We will conduct in-depth due diligence investigations into a subset of our largest or highest-risk suppliers from the 57 identified. These targeted deep-dive reviews will focus on suppliers that represent significant spend or risk exposure and will help uncover any issues that a paper-based assessment might miss.
Supplier Engagement, Corrective Action and Remedy	Sustain active engagement with suppliers and partners, including follow-ups on SAQ findings, collaboration on corrective action plans, and provision of guidance or support to improve their labour practices.

Supplier Engagement, Corrective Action and Remedy	Maintain strict oversight of tenders and proposals: all major procurement processes will include modern slavery criteria and compliance checks, with 100% of new contracts adhering to our modern slavery provisions.
Training and Collaboration	Continue modern slavery training for onboarding of new staff and maintain training for existing staff through refreshers from training system.

By focusing on these commitments and measuring our progress, we aim to ensure that our modern slavery prevention efforts are not only maintained but continually improved. This proactive approach will help us demonstrate year-on-year improvements in areas such as supplier due diligence coverage, training reach and effectiveness, and remediation outcomes, thereby reinforcing Harvest Road Group's dedication to ethical operations and supply chains.

Consultation With Owned and Controlled Entities

Consultation with all Harvest Road Group owned, and controlled entities has occurred in the preparation of this Statement, as well as in relation to our overall modern slavery response across the reporting period. Harvest Road Group's Head of ESG has engaged with representatives across Harvest Road Group's business operations to review and support actions against modern slavery.

All entities within Harvest Road Group undertake the same risk assessment and due diligence processes described throughout this Statement and have been subject to the Sedex risk assessment, detailed further on page 15.

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Harvest Road Group Pty Ltd