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STOCKYARD GROUP PTY LTD

# Modern Slavery Statement FY25

STOCKYARD

ESTABLISHED 1958, AUSTRALIA

STOCKYARD GROUP PTY LTD ABN 27 640 897 472

## Modern Slavery Statement 2025

### INTRODUCTION

This Modern Slavery Act Statement (Statement) has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (the Act) for the period 1 July 2024 to 30 June 2025.

This is the Stockyard Group's third Modern Slavery Act Statement. It outlines the progress that we have made to identify, manage, and address modern slavery risks in our operations and supply chain.

The numbered sections of this Statement correspond with each reporting criteria under the Act.

### CRITERIA 1: REPORTING ENTITIES

This statement covers Stockyard Group Pty Ltd (ABN 27 640 897 472) and its subsidiaries. The reporting entities included in this statement are:

- Stockyard Pastoral Pty Ltd ABN 15 639 966 377
- Stockyard Lot Feeders Pty Ltd ABN 58 009 900 645
- Stockyard Beef Pty Ltd ABN 17 080 801 770
- Stockyard Personnel Pty Ltd ABN 65 640 840 473

This statement has been prepared for Stockyard Group as a whole. Where this Statement refers to "Stockyard", "we" or "our", it refers to the Stockyard Group and the entities listed above.

Registered office: Unit 104.3, 6 Leonardo Drive, Brisbane Airport, QLD, 4008.

### CRITERIA 2: STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### Structure

Stockyard is an Australian family-owned and operated large proprietary company established in 1958. We have four controlled entities that Stockyard Group Pty Ltd wholly owns, and all are incorporated in and operate solely within Australia.

### **Operations**

Stockyard is a fully integrated branded beef business operating across three business activities:

- Ownership, control and operation of pastoral properties;
- Cattle breeding and backgrounding, and livestock feed lotting; and
- Sales and marketing of high-quality branded beef into global markets.

The operations primarily take place across our three locations – Kerwee Feedlot in

Jondaryan, Queensland, our Brisbane-based office and our breeding operations across properties largely in the New England region of New South Wales.

Stockyard's branded beef is sold and distributed to 20 countries throughout Asia, North America, the Middle East, Europe, the UK and Australia.

As of 30 June 2025, Stockyard employed 61 Full Time Equivalent (FTE) team members (employees) and 4 casual team members, all within Queensland and New South Wales. Each employee has entered individual contracts with Stockyard, and each is offered competitive remuneration to attract and retain their talent. The employment contracts establish clear employment terms and conditions in compliance with all legislated labour laws and regulations within Australia. Stockyard employees 4 team members on visas and all comply with Australian regulations. Stockyard is an equal-opportunity employer committed to providing industry-leading employment, career and personal development opportunities for all employees.

### **Supply Chain**

During the reporting period, Stockyard had a network of 329 direct suppliers. These suppliers vary in size, from small family-owned businesses to large corporations. All of our tier 1 suppliers operate within the Australian jurisdiction and provide goods and services, including cattle, commodities, equipment and machinery, meat processing, trucking, shipping and logistics and business services.

# CRITERIA 3: RISK OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

Stockyard has extensively reviewed its supply chain to assess the risks of modern slavery.

For Stockyard, the potential risks of modern slavery can occur in two areas:

- 1. Employment practices; and
- 2. Procurement practices.

### **Employment practice risks**

Stockyard recognises the potential to inadvertently contribute to modern slavery through its employment practices. These risks are largely influenced by factors that are inherent to the industry and business model that Stockyard operates within.

- Remote location: Due to the regional and at times remote nature of some of our pastoral and lot feeding work, Stockyard is at times responsible for the provision of accommodation for workers and their families. As a result, Stockyard holds direct responsibility for the living conditions of some team members.
- Migrant workers: Employment of workers under a visa arrangement may increase
  the risk of exploitation and modern slavery, where the individual relies on the
  employer for legal status and livelihood.

While acknowledging the potential risk factors, we believe the likelihood of this risk is low. Stockyard's workforce is located in Australia, with minimal dependence on employees working under Australian visas. We have established individual employment contracts with all employees that clearly define the terms and conditions of employment in compliance with the Fair Work Act and the National Employment Standards.

At Stockyard, we greatly value our employees and prioritise their well-being as part of our commitment to ethical employment practices. We have management systems to monitor and maintain our commitment to fair employment conditions, employee well-being, and diversity and inclusion.

We also provide annual training to help team members identify modern slavery risks in our workplace and supply chain, and understand the entitlements available to them under Australian legislation and within their employment contracts.

### **Procurement Practice Risks**

Stockyard acknowledges that we operate within an industry categorised as having a higher risk for modern slavery and that we may contribute, directly or indirectly, to modern slavery through our procurement processes within our supply chain.

The following practices have been employed by the Stockyard Group to manage our risks accordingly.

- Due diligence is undertaken on all new suppliers prior to being approved as a new supplier which requires a risk assessment to be completed by a manager and approved by two members of the Executive Leadership Team (ELT) within the reporting entities. On an annual basis, all direct suppliers are re-assessed against sector and industry risks, product and service risks, geographic risks and supply chain risks to ensure compliance is maintained. Within the reporting period, no new suppliers were identified as having a high risk. The remaining suppliers have been ranked as low.
- Our procurement strategy for our major inputs including cattle, grain and other commodities are based on long-term relationships with reputable Australian suppliers and is governed by our Purchasing Policy.

# CRITERIA 4: ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

During the reporting period, Stockyard did not identify any instances of modern slavery in our supply chain or operations. Consequently, no remediation actions were required or took place.

Supported by our strong corporate governance structure, in this reporting period, Stockyard took action to assess and address modern slavery risks in the following ways:

- Renewal of our modern slavery reporting framework with the inclusion of a risk assessment for all suppliers within the reporting period to support the survey data from our FY2022-23 reporting period.
- Strict corporate governance structures to proactively identify and implement preventative measures to reduce our modern slavery risks.
- Engagement with suppliers and distributors to ensure we mitigate risks in our supply chain.
- Instilling appropriate policies and procedures to safeguard our teams.
- Providing pathways for reporting modern slavery concerns with a fair review and transparent remediation process.

### Governance

Stockyard is committed to working with all stakeholders to assess and address the risk of modern slavery in its operations and supply chain. Modern slavery risk management is incorporated into our overall corporate governance and risk management approach. This includes:

- Incorporation of Modern Slavery considerations within our governance schedule, risk management register and Audit and Risk Committee (ARC) compliance framework;
- Regular reporting to and oversight by the ELT, Board and the ARC;
- Risk assessments of all new suppliers and distributors; and
- Second-level due diligence undertaken on all suppliers and distributors that are assessed as being in an elevated category of modern slavery risk.

Furthermore, as part of our commitment to identify and eradicate slavery and human trafficking and to continuously assess and address modern slavery risks, we will use our best endeavours to procure from suppliers that maintain full compliance with the Act. We will use best endeavours to separately require that any actual or potential risk of breaching the Act that suppliers identify in their own operations or supply chains are communicated to us. This information will be assessed and evaluated appropriately by the ELT and, where appropriate, the ARC or Board.

### **Engagement with suppliers and distributors**

Stockyard monitors and works closely with suppliers with elevated risk to implement appropriate controls to identify, review and mitigate the risk of modern slavery practices. We prefer taking a collaborative approach to managing suppliers in the first instance to encourage industry-wide best practices.

As stated in Criteria 3, we have begun assessing new suppliers for their modern slavery risk profile in line with our Modern Slavery Risk Assessment Framework prior to being onboarded. Existing suppliers are reassessed on an annual basis.

### Policy and procedures

Stockyard has a suite of internal policies and procedures that act as modern slavery controls.

Under the authority of the Board, the ARC has primary responsibility for identifying and controlling risks, including modern slavery risks. The Board reviews and implements policies for managing risk.

Policy	Purpose
Code of Conduct Policy	Stockyard's Code of Conduct outlines expectations for ethical behaviour aligned with the company's values. It applies to all personnel—including team members, contractors, directors, consultants, volunteers, and temporary staff—who are expected to uphold these values, respect human rights, and actively work to reduce the risk of modern slavery across Stockyard's operations and supply chain.
Team Member Handbook	Stockyard's Team Member Handbook provides ready access to all of Stockyard's company policies and details

Policy	Purpose
	on employment conditions in an effort to provide
	transparency for all team members. It also provides
	information on training opportunities, review of
	performance and disciplinary matters.
Recruitment Policy	Stockyard's Recruitment Policy provides a framework and procedures for how Stockyard and its reporting entities recruit and onboard team members. This policy aligns with Equal Opportunity Legislation and Fair Work Act 2009 and strives to eliminate any unfair discrimination and bias in Stockyard's recruitment practices.
Purchasing Policy	The Stockyard Group Purchasing Policy provides the policies and procedures for transactions, authority and systems relating to purchasing and the tender process.
	This policy and its procedures apply to all team members under Stockyard Group and related entities. It was updated in FY24 to include changes to new supplier forms that now include modern slavery declarations.
Risk Management Policy & Associated Frameworks	Stockyard's Risk Management Policy and associated framework applies to all Stockyard's directors, team members and contractors and its subsidiaries. It expresses Stockyard's commitment to robust and transparent management of material business risks, including modern slavery risk, and the Board's commitment to promoting and embedding a robust risk management culture.
Whistleblower Policy	This policy details the mechanism through which a report of wrongdoing (including in respect of any modern slavery risk) can be made. It describes the comprehensive protections and support available for whistleblowers, including assurance that any report would be kept confidential and investigated fairly.

### **Grievance and remediation processes**

The directors and management of Stockyard are committed to high standards of conduct in all business activities and facilitating a culture where team members feel comfortable reporting or raising concerns about illegal, unacceptable, unethical or undesirable conduct.

Investigations of alleged misconduct are conducted in a confidential, fair and objective manner. Stockyard is committed to taking appropriate action where issues are investigated and substantiated.

### CRITERIA 5: ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Stockyard understands that it is necessary to continually assess the effectiveness of our actions to assess and address modern slavery risk.

It is intended that the ELT will, in conjunction with the ARC, review the effectiveness of our modern slavery controls and report regularly to the Board. Stockyard will undertake compliance and assurance activities to ensure that it adheres to the policies and procedures related to modern slavery.

As part of our governance, risk and compliance framework, Stockyard will review and update, where necessary, controls that will impact modern slavery-related risks.

In its FY2O23-2O24 Modern Slavery Statement, Stockyard outlined several actions it took to address risks in its supply chain. This reporting period, Stockyard continued to make progress on these actions and has included additional activities that are outlined in the table below:

Action	Progress
Supplier Contracts	Where applicable and practical, Stockyard will introduce compliance to our modern slavery requirements in contracts and review of the necessary contracts is currently underway.
	In line with the new Modern Slavery Risk Assessment methods introduced this reporting period, key personnel will be required to complete due diligence on any new suppliers as part of their onboarding process.
	In FY2O26, we will integrate our supplier onboarding process with our workplace operations platform to digitise the onboarding process, improve transparency and streamline the auditing process.
Modern slavery actions incorporated in corporate governance	Additional Modern Slavery activities have been included within our existing corporate governance schedule as managed by the Board including an annual risk assessment and reporting as well as communication with our key suppliers.
	We continue to monitor and implement improvements to the modern slavery framework.
Training of key personnel	Key personnel within the Stockyard Group have completed training on modern slavery, and how to identify the risks within our supply chain.
	In FY2O26, we will extend that training to a wider circle of team members.

### CRITERIA 6: CONSULTATION PROCESS

During the reporting period, Stockyard engaged and consulted with all the entities that are controlled or owned by Stockyard (as outlined in Criteria 1: Reporting Entities) to prepare this statement and assess and address risks. The Executive Leadership Team are responsible for the activities of all the reporting entities, and they have participated in the development of this statement.



### CRITERIA 7: PROVIDE ANY OTHER RELEVANT INFORMATION

All relevant information has been included within each criterion.

### CRITERIA 8: APPROVAL

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 and constitutes Stockyard's slavery and human trafficking statement, covering all reporting entities listed in respect of the financial year 1 July 2024 to 30 June 2025 and was approved by the Board of Directors on 28 November 2025.

Lachie Hart

28 November 2025