

# Modern Slavery Statement

For the reporting period 1 July 2023 – 30 June 2024





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MLA's *Modern Slavery Statement* is available online at mla.com.au/ modern-slavery-statement

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# **Message from our Chair and Managing Director**

MLA recognises it has a responsibility under the *Modern Slavery Act 2018* (Cth) and is committed to preventing slavery and human trafficking within our business and supply chain.

MLA has a zero-tolerance approach towards any conduct that may constitute modern slavery and expects commitment to the principles set out in our Code of Conduct from all organisations with which we do business with. MLA will not support or do business with any individual or organisation that is knowingly involved in modern slavery practices.

We acknowledge there is a significant risk of modern slavery in the Australian agriculture industry. Nevertheless, we are confident there is minimal risk of this occurring in MLA given the nature of our business as the industry marketing and research body. MLA upholds the value that 'Integrity is at the heart of everything we do'. We believe transparency and accountability are essential in fostering a culture of integrity, and are dedicated to working collaboratively with our employees, suppliers, and stakeholders to uphold these values.

MLA recognises that identifying and addressing modern slavery risk in our operations and supply chain requires ongoing focus and continuous improvement, as well as positive collective action. Therefore, we have developed a framework to guide our response in the event modern slavery is discovered within our supply chain, and we continue to prioritise training our people to identify any warning signs. It's also our priority to continue to strengthen our workplace culture by improving physical and psychological safety in our business so our employees feel safe, supported and confident to raise concerns if something does not feel right. This is fundamental to identifying, investigating and responding to potential modern slavery concerns across our value chain.

As part of our commitment, we are pleased to publish our FY24 Modern Slavery Statement, which provides more information about our operations, supply chains, our progress in this financial year, our future improvement and continuous improvements. The purpose of this statement is to present MLA's actions in understanding potential modern slavery risks related to its business, and in developing steps which are aimed at ensuring it has robust frameworks and processes in place to minimise the risk of modern slavery in its own operations and supply chains.



John Lloyd



Michael Crowley Managing Director

# Introduction

This statement is published in accordance with Section 13 of the *Modern Slavery Act 2018* (Act) and is the fifth statement for Meat and Livestock Australia Group (MLA) which includes its subsidiaries, MLA Donor Company (MDC) and Integrity Systems Company (ISC). MLA and its subsidiaries are committed to strengthening our work in this area year on year.

# **1.** Our business and structure

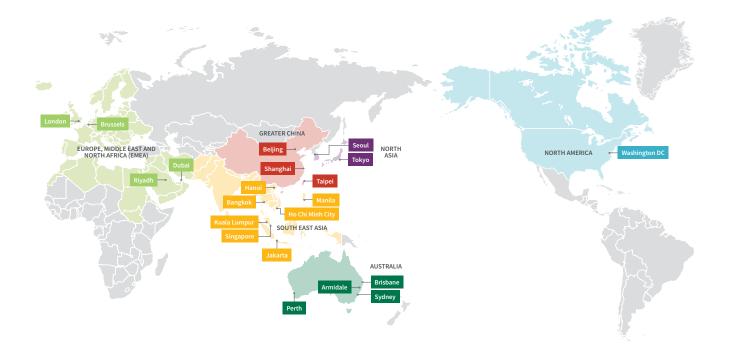
MLA is the declared industry marketing body and the industry research body under sections 60(1) and 60(2) of the *Australian Meat and Livestock Industry Act 1997*, and is a public company limited by guarantee.

MLA's head office is located at Level 1, 40 Mount Street, North Sydney, NSW, Australia, and has offices in Brisbane, Armidale, and Perth. MLA also operates across several international locations such as the United States of America, Japan, South Korea, China, Taiwan, Singapore, Indonesia, the United Kingdom, Brussels and the United Arab Emirates. MLA also has a presence through local agents in Malaysia, Thailand, Saudi Arabia, the Philippines, and Vietnam.

<u>Contact details</u> for these international offices can be found on the MLA website.

As on 30 June 2024, MLA had 287 employees (266 permanent and 21 fixed term contractors) both domestically and internationally. MLA's workforce profile reflects a balanced gender profile and age distribution across the organisation.

Approximately 55% of MLA employees are women. MLA employees are based strategically to leverage the best possible access to all stakeholders and to drive demand for red meat in our key markets.



#### **Our purpose**

MLA's purpose is to deliver world leading outcomes that fuel global competitiveness, sustainability, and producer profitability. To achieve this, MLA collaborates with stakeholders to invest in research, development and marketing initiatives that contribute to our vision to foster enduring prosperity for the Australian red meat and livestock industry. Through our subsidiary companies, we also accelerate innovation across the value chain and deliver the industry's integrity and on-farm quality assurance programs.

### **Our subsidiaries**

MLA owns two operating subsidiary companies, both located in MLA's head office in North Sydney:

<u>MLA Donor Company</u> (MDC) accelerates innovation across the value chain so that the Australian red meat and livestock industry can remain competitive on the world stage. It does this by attracting commercial investment from individual enterprises and others that have a mutual interest to co-invest in innovation that will benefit the industry. .

Integrity Systems Company (ISC) is responsible for delivering the red meat and livestock industry's traceability and quality assurance systems: the Livestock Production Assurance (LPA) program, LPA National Vendor Declaration (LPA NVD) and the National Livestock Identification System (NLIS).

## **Our funding**

MLA is primarily funded via transaction levies paid on livestock sales by producers and these levies are used to support marketing, research, and development activities. MLA also receives funding through funding co-contributions matching levy investments through the Australian Government, unmatched grants, and other funding streams.

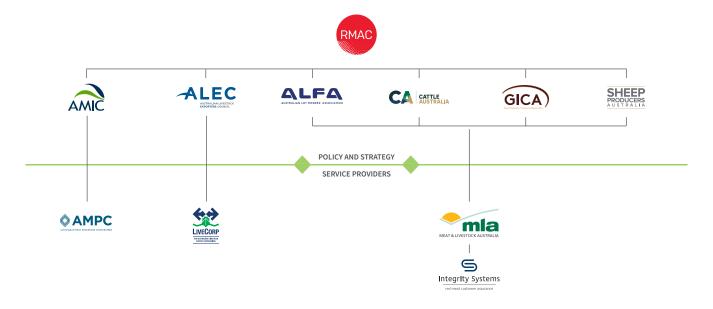


# 2. Our operations and supply chain

As the declared industry research and marketing body under the *Australian Meat and Livestock Act*, MLA works in partnership with the red meat industry and Australian government to deliver marketing, research and development products and services to the Australian beef cattle, sheep, and goat sectors, with the core purpose of fostering the prosperity of the red meat and livestock industry.

The Australian Government sets high-level priority research and developments covering community, industry, and environmental concerns. MLA works closely with peak industry bodies to consult with levy payers on industry needs and priorities to ensure MLA's strategy reflect these.

The structure of the overall red meat industry is set out below:



MLA's key operations are broadly categorised as follow:

## **Key operations**

#### Research, development, extension and adoption (RDE&A) activities

- MLA invests in on-farm, off-farm and value chain information research, development, extension and adoption programs to boost the productivity, sustainability, and profitability of the Australian red meat industry.
- Our research, development, adoption, and extension activities aim to invest in current and emerging industry leaders, innovators, and scientists to enhance professional and business skills in the red meat industry.
- In addition to these activities being funded through producer levies, MDC accelerates innovation across the value chain by attracting commercial investment from individual enterprises and others that share a mutual interest to co-invest in innovation that will benefit the industry.

## Supply chain

We collaborate with peak industry bodies, rural research and development corporations (RDCs), government bodies and state departments, universities, producer groups, pastoral groups, breeder societies, meat processors and retailers etc. to conduct these activities.

## **Key operations**

#### Traceability, integrity systems and programs

- MLA, through its subsidiary ISC, delivers the red meat and livestock industry's traceability and quality assurance systems such as National Livestock Identification System (NLIS), Livestock Production Assurance (LPA) program, National Vendor Declarations (NVDs).
- These activities aim to protect the Australian red meat and livestock industry by helping to protect its disease-free status and provide product assurance to customers and consumers.

# Supply chain

ISC collaborates with government bodies and state departments, technology providers, producers, processors, transporters, professional services consultants (including industry trainers, auditors, and accreditation bodies) to ensure we maintain the industry's integrity and assurance programs.

#### Marketing and industry insights programs (domestic and international)

MLA is focussed on demand generation by:

- Building awareness and preference for Australian red meat products through data insights, consumer marketing campaigns and partnering with exporters through marketing development partnership arrangements.
- Maintaining and improving access to global markets, through customised in-market consumer marketing and market access activities.

#### **Communication activities**

- Our communications programs are committed to foster industry prosperity by ensuring MLA's marketing, adoption, extension, research and development products and services are known and accessible to levy payers and stakeholders (government, state farming organisations, the community and MLA members, as well as the industry corporate affairs).
- It also seeks to build confidence in the industry through strong stakeholder engagement, publication of magazines, print and social media presence, and industry events.

We engage a range of professional agencies to help implement marketing strategies, including advertising, marketing, event management, branding, design, social media, public relations, and market research.

We engage a range of consultants and professional agencies to undertake public relations, copywriting, events management, media, and social media management, as well as printing of industry materials.

#### **Operational Support**

MLA's business activities are supported operationally by an in-house corporate services team performing functions relating to:

- Finance
- Monitoring and Evaluation
- Office Services
- Human Resources
- Information Technology
- Commercialisation and IP
- Projects and Process Improvement
- Financial Planning and Analysis
- Legal
- Contracts
- Risk and Compliance

More information on MLA's programs and deliverables can be found in our Annual Report 2023–24.

## Our operations and supply chain continued

62% of total costs were related to research, development, adoption and extension activities, 32% were related to marketing, market access and insights activities, and 6% were related to corporate services costs. Approximately 84% of MLA's total spend during FY24 was with suppliers located in Australia. Our largest categories of spending were made to suppliers and partners operating in the following sectors, totalling 59% of all spend categories:

- Universities and Training Centres (approximately 23%)
- Research and Development Corporations (approximately 16%)
- Professional services and consultancy firms (approximately 10%)
- Advertising (approximately 6%)
- Government agencies (approximately 4%).

Of the 16% of overseas spend, the majority of the costs were related to direct marketing activities (61%) and administrative support costs (39%). Reputable advertising and marketing agencies, professional services and consultancy firms, PR and media consultants, data insights, and brand strategists were engaged in delivering marketing activities in our overseas regions.

# 3. Potential risks in our operations and supply chains

In FY24, MLA engaged approximately 1,509 suppliers from five regions (spanning Australia, Asia, North America, the Middle East, the UK, and Europe) with 66% of suppliers rated as low for modern slavery risks and 34% of suppliers rated medium risk.

MLA has identified a potential for higher risks of modern slavery practices in the following sectors that form part of its business relationships:

- Farming and feed lotting
- Meat processing
- Food manufacturing, food services, catering, and hospitality
- Manufacturing (machinery, clothing, uniforms, and promotional items)
- Commercial cleaning
- Information technology
- Logistics (relocation)
- Recruitment.

A majority of MLA's business relationships with its supply chain is in the capacity of collaborating on research, development, adoption, extension, and marketing activities with universities, professional services, government entities, research centres as well as businesses in the food, beverage, and agriculture (FBA) sectors. MLA understands that there are multiple modern slavery risk factors present in the FBA sector, such as high demand for base-skilled labour in production, processing, packaging, transport, and services. Numerous instances of exploitation have been found in the labour sourcing industry and the FBA sector more broadly. As such, MLA recognises that there is risk that MLA may be directly linked to modern slavery practices through operations of business partners in countries and sectors reported to have a higher prevalence of modern slavery.

In FY24, MLA continued to review its supply chain and refined risk assessments of service providers and suppliers engaged by MLA and its subsidiaries. The risk assessments considered factors that may possibly cause, contribute, or be directly linked to modern slavery practices as outlined in the Attorney-General's Department's Commonwealth Modern Slavery Act (2018) Guidance for Reporting Entities.



# 4. Actions taken by MLA to assess and address modern slavery risks

MLA has implemented a framework to assist in addressing the modern slavery risks associated with our operations and supply chains. This framework establishes our business processes in respect to modern slavery and human trafficking concerns.

## **Policies and processes**

MLA has established a suite of policies to support our modern slavery responses. Our policies clearly articulate the standards we expect from our people, our suppliers, and our business partners, including in relation to preventing and addressing modern slavery risk to ensure MLA has fair and ethical practices in place and is compliant with workplace laws. Our policy framework includes:

- Code of Conduct: A set of guiding principles and minimum standards of ethical behaviour expected of staff when conducting business activities, including zero-tolerance towards any conduct that may constitute modern slavery.
- Whistleblower Policy: Our Whistleblower Policy supports our commitment to maintain an open working environment, in which staff may raise or report concerns of business and personal ethics being breached while performing duties and responsibilities. In addition to internal reporting channels through our Whistleblower Protection Officer, senior management or the Board, MLA has also made available an independent and confidential whistleblower service for its staff, contractors, and other stakeholders to enable reporting of any issues and grievances that may adversely affect MLA, its people, or its reputation.
- <u>Diversity and inclusion policy</u>: This policy is in place to outline our commitment to value and respect the unique contributions of people with diverse backgrounds.
- Anti-Bribery and Corruption Policy: This policy articulates our commitment to complying with laws and regulation addressing fraud, bribery, and corruption in each country we conduct business.
- Procurement Policy: This policy describes the framework, responsibilities, practices and expected behaviours of MLA staff and contractors in relation to procurement activities. It prohibits modern slavery practices and reiterates the Code of Conduct.

- Grievance and Dispute Resolution Procedure: This procedure is in place to handle grievances and resolve disputes at work. Employees may informally or formally raise grievances related to work or the work environment where they think any act, omission, situation, or decision is unfair, discriminatory, or unjustified. The resolution steps are also outlined in the procedure to provide transparency to the process.
- Modern Slavery Remediation Proceduree: This procedure is in place to provide a practical framework for MLA to remediate slavery victim(s) should MLA have caused or contributed to modern slavery practices during the course of employment or engagement. In FY24, this procedure was implemented and communicated to MLA staff. The roles and responsibilities of the identified Remediation Team were clarified and discussed in accordance with the Procedure.

## Recruitment

MLA's staff is largely employed in professional roles, delivering research, developments and marketing programs for the industry. 69% of our staff are subject to an Enterprise Agreement, including administrative and support staff. Our Recruitment Policy underpins our commitment to a fair and transparent process, with recruitment strategies developed with the Human Resources team. Candidates are sourced either via external advertising on notable job boards, social channels, and forums, or through reputable recruitment agencies, which are vetted for modern slavery risks.

MLA has in place a Remuneration, People and Culture Committee that has oversight of strategic human resources policies to ensure they are appropriate and consistent with MLA's objectives and values. Furthermore, MLA has in place a Consultative Committee and a Work, Health and Safety Committee that meet on a quarterly basis, with representation across all levels of the organisation. All staff are invited to put forward their thoughts, opinions and ideas on matters relating to terms and conditions of employment, the workplace, MLA's operations, safety, and wellbeing initiatives.

## **Due diligence**

MLA operates a zero-tolerance approach to modern slavery and is committed to acting ethically in all our business dealings and relationships. MLA has adopted a risk-based approach in our modern slavery due diligence, by applying risk factors, such as sector, industry, types of products and services, geographic locations and entity risks as part of assessments.

In FY24, MLA's Modern Slavery risk assessment methodology, processes and system were reviewed and updated to ensure they remain valid, relevant, complete and current. The updates were made upon assessing MLA's operations, its supply chain and in accordance with the guidance from the International Labour Organization (ILO) and the Global Slavery Index.

MLA continued to utilise its implemented systems and controls to assess and record modern slavery risks, which were consistent with the approved modern slavery risk management methodology. All MLA staff with procurement and project management duties were required to assess suppliers and business partners prior to engagement.

Where suppliers were flagged as being at higher risk for modern slavery practices, due diligence questionnaires were issued and assessed by the Risk and Compliance team. As part of the assessment process, MLA referred to information from reliable sources such as the Attorney-General's Department, the UN Guiding Principles on Business and Human Rights, the Global Business Initiative on Human Rights, the Business and Human Rights Resource Centre and the Global Slavery Index.

In FY24, 45 questionnaires were issued to suppliers and business partners flagged for higher risk of modern slavery practices, where information was not readily available. Some of these suppliers and business partners operated in industries such as agriculture, food manufacturing, meat processing, meat wholesale, telecommunications and cleaning. Additional information provided by the identified entities noted adequate governance, policies and controls in place to manage modern slavery risks.

The modern slavery risk management framework is regularly reviewed, and its activities are reported to the Audit, Finance and Risk Committee and the MLA Group Boards on an annual basis.

## Service provider contracts

MLA has included contractual terms in our standard agreements relating to the requirement for service providers to adhere to Ethics Laws, including the *Modern Slavery Act 2018* (Cth). <u>MLA agreements</u> are made available on MLA's website.

### **Knowledge and awareness**

As part of the modern slavery training program to educate staff on modern slavery risks and established processes to identify and manage such risks, MLA continued to provide targeted training via mandatory e-learning modules and trainer-led sessions to staff in Australia and in our overseas offices. Refresher training sessions were also rolled out to existing staff to ensure high understanding and strong compliance with our processes. In FY24, 95% of new employees attended mandatory modern slavery training and refresher training was also offered to existing staff.

These sessions were aimed at raising staff awareness, educating and reminding staff of their obligations in identifying, mitigating, and reporting modern slavery risks within the supply chain. Staff were also trained in performing and recording modern slavery risk assessments prior to engaging suppliers. With support from the Finance and Contracts teams, the Risk and Compliance team identifies weak compliance issues and provides additional training to ensure the process remains robust.

Staff is also frequently reminded to report to the Risk and Compliance team should they become aware of (potential) modern slavery practices in our supplier's operations, for further escalation to senior management. In addition, internal guidelines and resources were available to supplement the training provided through a dedicated modern slavery resource page on MLA's intranet.

In compliance with the Modern Slavery Act 2018 (Cth), MLA has submitted an annual modern slavery statement to the Australian Government's Online Register for Modern Slavery Statements since FY20. The <u>approved</u> <u>statements</u> have also been published on MLA's website.

# 5. Assessment of the effectiveness of MLA's due diligence process

We are committed to maintaining effective systems to identify, assess, address, and proactively manage modern slavery risks in accordance with relevant legislation, international human rights standards, regulatory obligations, shareholder expectations and good corporate governance principles.

During the reporting period, MLA did not identify any instance of modern slavery practices caused by our own operations, or through our supply chains. We did not receive complaints or concerns raised through our reporting channels, including the independent whistleblower hotline. However, we recognise that there are opportunities to improve the framework through stronger and more efficient systems and controls.

Since FY21, MLA has continually reviewed its methodology, systems and processes to identify and assess modern slavery risks in its operations and supply chains, as well as staff understanding and awareness of modern slavery risks. The roadmap previously developed from an independent review of MLA's Modern Slavery maturity level and its readiness to comply and respond to the Act has also been successfully implemented through constant review and upskilling opportunities by the Risk and Compliance team to ensure better practices are captured. The outcomes of the report and the progress of the roadmap were presented to the Audit, Finance and Risk Committee.

# Future and continuous improvements

In FY25, MLA will monitor the proposed key recommendations from the independent review of the modern slavery act commissioned by the Australian Government in 2023. MLA will develop a preliminary roadmap against the new proposed key recommendations to assess MLA's Modern Slavery maturity level and its readiness to comply and respond to potential changes to the Act.

We have identified the following key areas of focus for FY25 and beyond:



Key area	Roadmap
Modern Slavery Act Requirements	<ul> <li>Continue monitoring the upcoming changes to the Act's requirements based on the recent independent review and recommendations tabled to the Parliament.</li> <li>Assess MLA's maturity against the key recommendations and prepare a roadmap to implement the potential changes.</li> </ul>
Modern Slavery Key Performance Indicator	<ul> <li>Develop risk metrics and KPIs to help MLA measure and monitor its response and quantitative impact of its actions to the modern slavery act.</li> </ul>
Risk Assessment and Due Diligence	<ul> <li>Continue reviewing modern slavery risk assessments and due diligence records in the system to ensure validity, relevancy, completeness, and currency.</li> </ul>
Policy and Governance	<ul> <li>Continue to:</li> <li>Embed modern slavery clauses in our agreements.</li> <li>Improve and refine MLA policies to ensure they remain fit for purpose.</li> <li>Review and strengthen MLA's systems and controls to manage modern slavery risks in our operations and supply chains.</li> <li>Report on the modern slavery risk management program annually to the Audit, Finance and Risk Committee and the MLA Group Boards.</li> </ul>
Training and Awareness	<ul> <li>Revisit training and awareness resources to ensure the validity, relevancy, completeness, and currency of the materials.</li> <li>Roll out refresher modern slavery e-learning and implement auto enrolment schedules for existing employees.</li> <li>Continue to provide mandatory modern slavery risk training to new employees in both Australia and overseas locations through e-learning modules.</li> </ul>

# 6. Consultation with MLA subsidiaries

# MLA has addressed the requirements under the *Modern Slavery Act 2018* (Cth). This statement was approved by the boards of each of the three reporting entities covered by this statement as below:

This statement was endorsed and approved by the MLA Board on 19 November 2024. This statement was endorsed and approved by the MDC Board on 18 November 2024. This statement was endorsed and approved by the ISC Board on 12 November 2024.

A Klay

, John Lloyd MLA Board Director – Chair 19 November 2024





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