

Form 59
Rule 29.02(1)

Affidavit

No. VID417 of 2024

Federal Court of Australia
District Registry: Melbourne
Division: General

Applicant The Game Meats Company Australia Pty Ltd
ACN 095 440 823

Respondent Farm Transparency International Ltd
ACN 641 242 579

Affidavit of: **Eugene Christopher Tomasoni**
Address: 21 Dunstan Track Tawonga Gap Road, Bright
Occupation: Company Director and Business Owner
Date: 28 June 2024

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Filed on behalf of (name & role of party)	Applicant
Prepared by (name of person/lawyer)	Christopher Neville
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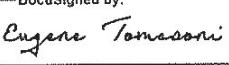
[Version 3 form approved 02/05/2019]

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I Eugene Christopher Tomasoni affirms:

1. I have affirmed an earlier affidavit in this proceeding dated 16 May 2024.
2. The contents of this affidavit are true to my knowledge, unless otherwise stated, in which case they are true to the best of my information and belief and the source of my information and belief is stated.

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3. The Company operates a licenced meat processing facility pursuant to Licence Number X00042, Licence Category : Export Abattoir, issued by PrimeSafe in accordance with the provisions of the *Meat Industry Act 1993* (Vic), at Hughes Lane, Eurobin, Victoria, and which is issued on an annual basis. The current licence to operate was issued on 2 June 2023 and expires on 30 June 2024. The licence has been renewed and I can produce a copy of the licence for the period 1 July 2024 to 30 June 2025 once it has been received. Exhibited to this my affidavit and marked "ECT1" is a true and correct copy of the Licence to Operate a Meat Processing Facility for the period 1 July 2023 to 30 June 2024. It is a legislative requirement to hold the licence in order to undertake the processing of meat, which is not to be sold at the same premises, and the licencing relates to growing, harvesting, slaughtering, processing, transporting and selling meat. The company has held a licence since it commenced operation in 1997. The Company also holds approval to export issued by DAFF which issues an establishment number, in the case of the Company the establishment number is 2019, and DAFF regulate all export abattoirs in Australia.

Farm Transparency International (FTI) entry on to the property and installation of hidden cameras

4. Steps have been taken to ensure that the property upon which the abattoir is located and the abattoir itself is secure and to ensure all persons are aware that entry into the abattoir without invitation or authorisation is not allowed in the following manner:
- (a) A six feet high cyclone metal chain and barbed wire fence is erected around the perimeter of the property.
 - (b) The entrance to the property is secured by an electronically controlled, locked and spiked iron gate. The gate is closed during our regular opening hours and if not the signage on the gate clearly visible to all visitors.
 - (c) Installed on the outside of the gate and visible to persons facing the gate are numerous signs which state:
 - (i) Q Fever risk site;
 - (ii) "Stop";
 - (iii) 'Restricted Area. Do not Enter, Authorised Personnel Only', and
 - (iv) 'Stop. All Visitors Must Report to the Office';

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- (v) Flammable Liquid warnings;
 - (vi) Camera surveillance;
 - (vii) Notice of export meat processing plant, and no unauthorised access (to stop potential contamination and spread of disease).
- (d) The office at the abattoir is not open to the general public but authorised visitors are to report to the office between the hours of 6.00 am and 4.00 pm, which are our operating hours.
- (e) Security cameras are installed at various locations around the abattoir and these cameras record on computer hardware any movement in locations where the security cameras are installed.
- (f) The main gate is the only access point for the abattoir.
- (g) The protocol for late deliveries is that the transport or carrier company notifies the Game Meats Company Australia Pty Limited (**Company**) of an estimated arrival time. The driver notifies the Livestock Receival Officer 45 minutes prior to their arrival and the Livestock Receival Officer opens the gate (electronic operation) upon the arrival of the livestock carrier. The gate closes automatically once the vehicle has passed the entrance sensor, securing the premises.

The signage installed at the entrance to the property along with the security fence were installed with the purpose of ensuring it is clear to all visitors and persons entering the abattoir that entry is by invitation and must be authorised.

5. At no time did FTI or other persons known to and acting on behalf FTI report at the office of the abattoir to obtain authorization to enter the property or the abattoir. Nor was FTI or persons known to them to be acting on their behalf invited to enter the property or the abattoir by the applicant or any person employed by or acting on behalf of the Company, nor was FTI given permission to install cameras or listening devices at the abattoir.
6. At no time has FTI or any other person contacted whether by phone call, email or other correspondence, the Company:
- (a) To inform the Company that they had entered the abattoir and installed hidden cameras;

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- (b) To inform the Company that they were in possession of images captured by those hidden cameras and that they intended to publish the captured images;
- (c) To inform the Company that FTI had published captured images to the DAFF on or about 5 May 2024, to the Seven Network prior to 17 May 2024 and on the FTI website on 17 May 2024.

FTI entry into the abattoir and the placing of hidden cameras

7. On or about 5 May 2024 FTI sent the complaint to the Department of Agriculture, Fisheries and Forestry (DAFF) signed by Harley McDonald-Eckersall (McDonald-Eckersall) as detailed in paragraph 17 of my affidavit affirmed on 17 May 2024.


A copy of the letter from FTI to DAFF is exhibited to the affidavit of 17 May 2024 at exhibit "ET4".
8. I was contacted by Darren Webb the General Manager of the Company on 14 May 2024 and told that he had received an email from Jason Olington the DAFF Field Operations Manager advising that sometime before 17 May 2024, FTI had provided edited extracts of the captured images to Seven Network's Albury-Wodonga newsroom (Seven Network). McDonald -Eckersall participated in the media story broadcast by the Seven Network on 17 May 2024 about the video and FTI's entry into the abattoir.

(the Seven News Story)

A transcript of the Seven News Story is exhibited to the affidavit of Christopher Neville sworn on 21 May 2024 at Exhibit "CN7" (affidavit dated 21 May 2024).

DAFF and the operations of the abattoir

9. DAFF employs an on-plant veterinarian ("the OPV"). The OPV is on-site at the abattoir each day for the entire day that production is undertaken. The OPV conducts a visual inspection and assessment of livestock in the morning prior to commencement of production. The OPV produces a weekly meeting agenda and conducts a meeting to discuss the agenda and operation of the abattoir. The meeting covers such matters as staff performance, work place health and safety, and animal welfare and identifies any issues noted by the OPV for that week. Dr Karl Texler has been the OPV at the abattoir since 1997. Also undertaking the role of OPV in Dr Karl Texler's absence in the period between 11 January 2024 and 18 April 2024 were Dr Iain Waddell and Dr Rob Irwin.

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Exhibited to my affidavit at exhibit "ECT2" are DAFF weekly on-plant management meeting agendas for the period 11 January 2024 to 18 April 2024.

10. As well as the regular management reports and meetings, DAFF requires bi-annual Export Meat Systems Audit Program (EMSAP) audit reports to be conducted by their Departmental Auditors each calendar year. The audit considers matters such as hygiene practices, sanitation, structure and equipment and animal welfare and to my knowledge there has never been any "unsatisfactory" or "unacceptable" results in any past audits undertaken. The audits conducted by DAFF in 2023 found audit outcome was acceptable and identified no critical non-compliances. Exhibited to my affidavit at exhibit "ECT3" are copies of the 2023 DAFF EMSAP audit reports.
11. Part of the OPV's role is to oversee issues of animal welfare in the production process. The Company takes the issue of animal welfare very seriously and endeavours to ensure that the applicable standards as regards animal welfare in the production process are met and complied with to the best of our ability. As noted by the OPV in the minutes of each of the weekly on-plant management meeting agendas, exhibited at "ECT1", there were no animal welfare issues reported by the OPV. Likewise, there were no animal welfare issues reported in both the 2023 and 2022 DAFF Audit Reports, exhibited at "ECT2".
12. The weekly on-plant management meeting agendas which are exhibited at ECT1 are completed and prepared by the OPV, that is, usually Dr Karl Texler or whichever OPV is at the plant during that week. If there is a serious compliance issue that requires attention the OPV identifies the issue in the agenda and minutes of the weekly on-plant management meeting. If there is nothing noted in the OPV weekly report then it means that there were no issues of non-compliance identified by the OPV which required addressing during the course of the usual meeting. If there was a concern with respect to an animal welfare issue identified in the processing of the animals then that concern would be recorded in this report for discussion with management of the abattoir. The OPV prepares the report and acknowledgment of the receipt of that report is reflected in the signature of the report on behalf of the Company, usually by Darren Webb the General Manager of the Company. The Company has no input as to what is included in the weekly report prepared by the OPV.
13. The weekly reports prepared by the OPV make reference to a Form 18 having been prepared with respect to a particular issue. A Form 18 is a document which is usually

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kept in the lunchroom that allows employees to complete the form and provide it to Steve Parmesan the OH & S Manager to ensure that the issue is addressed. The issues that can be raised by employees via the Form 18 process include any concerns about animal welfare or the ability of the employees to deliver animal welfare.

14. In the weekly reports prepared from 2 February 2024 there is a reference to Area Technical Manager Nicholas Rush undertaking an audit of the abattoir on 23 February 2024. Nicholas Rush did not undertake that audit however appointed consultants from Canberra to attend to the audit on behalf of DAFF.
15. In the report prepared by the OPV and dated 9 February 2024 there is a reference at item 7 to an "Animal Welfare Reference Document" and a reference to AMIC. The Reference to AMIC was in error as the company has not signed up to and is not bound by the AMIC standards.
16. The OPV is present on-site at the abattoir from approximately 5.30 am-5.45am in the morning prior to the commencement of production for the day. The OPV remains present at the abattoir all day until production is concluded. The OPV does not supervise each and every animal being slaughtered (the stunning and sticking process), however frequently roams throughout the abattoir during the course of the day to any parts of the abattoir that he wishes to visit, to inspect all aspects of the production process (including the slaughter of animals).
17. The OPV at the commencement of their day and prior to the processing of any animals will firstly conduct an inspection of the abattoir to ensure cleanliness and hygienic conditions for the processing of the animals. This inspection is conducted with the QA Manager of the abattoir, David Rowe. Once the OPV is satisfied that the abattoir is in condition to commence processing the OPV will then physically inspect the stock to be processed for the day and will identify any animals that should be drafted off for a later and more detailed inspection before they are processed. No production commences for the day until the OPV has indicated that production can commence. The OPV will inspect each carcass of a slaughtered animal to check for disease or to identify any other reason why the animal should not be processed. The OPV will also walk around other parts of the plant as and when they determine and is unrestricted in their movement throughout the abattoir.

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18. A substantial part of the Company's business undertaking in the abattoir is the processing of goats for human consumption. Having observed the production process at the abattoir for many years, I have observed that goats by their very nature are changeable in their behaviour with a large part of the ease of handling of the goats or otherwise, directly related to the location from which they have been sourced. By that I mean the majority of goats that we receive for processing are semi wild and free range in that they have usually been collected in the wild and placed into holding pens, they are then trucked to a transport depot where they are held until the depot has enough goats on hand to deliver a B-Double [truck/trailer] of goats to the abattoir (usually between 900 and 1,000 goats). Semi-wild and free range goats can be more difficult to handle and control than goats which are farmed by some of our suppliers which are usually more calm and consistent in their behaviour. By that I mean the farmed goats will usually simply follow one another through the plant until they reach the stun room where they are generally more compliant. The semi wild and free range goats in this area can be more difficult to handle and their hyper nervousness can mean that occasionally they try to jump out of the processing system to escape, because they are less used to human contact.

DAFF and VicPol Investigations

19. At the time of making this affidavit the Company has not received any formal correspondence from DAFF in respect to the formal complaint lodged by FTI with DAFF on 5 May 2024 or in relation to any investigation by DAFF into our animal handling and slaughter processes or any other matter.
20. Since I reported the trespass to the abattoir to Victorian Police in May 2024 (Incident Report No. 240189991) I have not received any update from police about their investigation into the trespass and installation of hidden cameras at the abattoir. I spoke with the Victorian Police during the week of 17 June 2024 and was advised that the police had obtained some CCTV footage from a property in Hughes Lane which identifies a white Toyota Prado in the vicinity of the abattoir at around the time of one of the entries to the premises however the number plate is unable to be enhanced with the tools that the Victorian Police have readily available to them and I have been informed that they are attempting to enhance that image so that they can pursue any lines of inquiry with respect to that vehicle. My solicitor, [Chris Neville/Michelle Trost] has informed me and I believe it to be true that Condon Charles Lawyers emailed police

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officer Anthony Finlaw on 19 June 2024 seeking an update into the police investigation into this matter. Exhibited to my affidavit at exhibit "ECT4" is a copy of the email from Condon Charles Lawyers to Anthony Finlaw of Victoria Police of 19 June 2024.

Disproportionate and false statements by FTI

21. The statements published by FTI and referred to and exhibited in paragraph 7 of this affidavit and paragraphs 11, 12 13, 14, 15 ,16 and 17 of the affidavit of Christopher Neville sworn on 21 May 2024 give a false and inaccurate portrayal of the overall business undertaking conducted by the Company at the abattoir and particularly the treatment of animals processed there.
22. The abattoir is on a two (2) hectare site and was constructed in 1996 with ongoing improvements and development of the abattoir occurring since the initial construction. There is one (1) administration/main office building which has both male and female changerooms, toilets and showers. There is a common tea/lunch room, three (3) chiller rooms, three (3) blast freezers, one (1) storage freezer, one (1) boning room, marshalling area, holding freezer, dehairing room, processing floor, lairage yards, maintenance workshop and a tool shed. The area where the goats are slaughtered is in a separate section of the abattoir and the slaughter floor is next to the stun room in the "dirty" part of the abattoir. The stuck carcasses proceed to either the skin on processing or the skin off processing part of the abattoir with the boning room only being used for skin off processing. The boning room is located in the "clean" area of the abattoir.
23. The abattoir is a professionally designed abattoir which is fitted with modern commercial animal processing plant and equipment which conforms with Australian Government regulations and the standards. The Company conducts its usual business undertakings in accordance with the standards and has been undertaking its business operations without compliance issues for approximately twenty-six (26) years.
24. The issue of animal welfare is addressed by the company on a weekly basis through the OPV weekly meetings and ongoing reinforcement with managers at the abattoir about the importance of maintaining good animal welfare standards as a priority of the company. The toolbox meetings of senior staff occur weekly and these are led by Darren Webb the General Manager of the abattoir. The toolbox meetings have each of the Department Heads raise any relevant issues for their area (OH & S, Production and Sales, QA and Maintenance) and the General Manager addresses the general premise

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of the operation of the abattoir which includes the importance of adherence to the applicable animal welfare standards. The Company's production process emphasises the importance of compliance with animal welfare standards and is communicated in the training of the slaughtermen employed in the abattoir who in turn are trained by more experienced and qualified slaughtermen in a buddy system where the new employee being trained will work with the experienced slaughterman until such time as they are observed by their manager and the QA manager to be competent. This training in the buddy system can take a number of weeks depending on how quickly the new employee understands the process and can undertake it effectively. The final assessment before the new employee is allowed to operate unsupervised and without a training buddy is made by the QA Manager, David Rowe who will physically observe the new employees undertaking their tasks and satisfy himself that they have the adequate skill set to complete that role. They do not operate unsupervised until David Rowe signs off on their competency.

25. The Company is overseen by a Board of Directors who provide direction to Darren Webb the General Manager (who is ultimately responsible for the day-to-day operation of the abattoir). The Company also employs a Production and Sales Manager, Rick Cavedon who reports to the General Manager and who oversees the production and sale of product processed at the abattoir. The company also employs an OH&S Manager, Steven Parmesan, who is responsible for the OH&S at the abattoir along with any maintenance issues which are identified and require attention. The QA Manager, is David Rowe, who is responsible for ensuring that the company complies with its QA program. The QA program relates to quality assurance across the business and includes compliance with animal welfare standards, The QA Manager signs off daily on his observations regarding compliance of the Company with the relevant standards. David Rowe reports to the Production and Sales Manager, Rick Cavedon. Josh Harris is employed as a Livestock Manager and is responsible for animal welfare throughout the production process. The Livestock Manager reports to the Production and Sales Manager.
26. As a result of what is seen in parts of the FTP footage, the Company has taken disciplinary action against some of the employees. Those staff were reassigned to new roles in the post-mortem aspect of the production process, whilst still being employed by the Company. Such disciplinary action was taken with respect to two employees of the

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Company Moses Saresarevata and Yazan Al-Masri who were working in the stunning/sticking area of the abattoir during the time that the footage was obtained by FTP. Both of these employees were employed under the Australian government Pacific Australia Labour Mobility scheme ("PALM"). Both of these employees underwent retraining and reinduction with respect to the various tasks required to be performed in the abattoir. The training took a number of weeks and was completed in accordance with the Standard Operating Procedures (**SOPS**) of the abattoir and was conducted as if they were new employees of the company. More generally and with respect to all staff the company conducted tool box meetings to reinforce the need to maintain the standards in compliance with the SOPS and provided DAFF with a corrective action plan. The stunners and stickers operating that part of the production process, while adequate and fit for purpose at the time, have since been upgraded and a second employee has been assigned to be stationed at the restrainer to ensure that no goats are able to get loose. Some of the images captured by FTI and included within the 13 minutes of film extracted from footage taken over a period of weeks and months depict incidents which are unacceptable to the Company. These incidents are, however, a disproportionate and out of context representation of the usual conduct of the Company taking into account the fact that over the period in which cameras were installed in the abattoir (between and 11 January and 18 April 2024), approx. 52,800 goats were slaughtered. What is seen in the film is a rare mistake by two (2) employees in the production process involving about 20-30 goats in the slaughter section of the abattoir (and not to the Company's knowledge and which the Company immediately and voluntarily addressed) – this is not how the Company ordinarily conducts its business. Exhibited to this my affidavit and marked "**ECT5**" is a true and correct copy of the Corrective Action Plan prepared as a result of the complaint to DAFF.

Effect on employees

27. The actions by FTI have caused considerable disruption to our employees. Morale has declined. In the immediate aftermath of the staff becoming aware of the footage there was push back from them to reduce their shift hours and load. Matthew Maguire (stunner) specifically expressed concerns about his face being shown on the footage. The employees are simply not processing the same amount of product as they were prior to becoming aware of the incursion by FTP and do not appear as committed to their jobs as what they were. At this stage the reduction in daily numbers is not on account of

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supply issues and the company is still able to source the goats that it needs to keep the numbers at their previous consistent levels. The problem is that the Company is just not able to process the same number of animals now, as it was able to before the discovery of the trespass and the captured images.

28. Morale is improving and production is returning to normal but if the employees are subjected to the proposed further publication of the captured images by FTI then the willingness of employees to work in the stun and stick process and the production values will again decrease.

29. For the reasons expressed below, publication of the captured images has caused significant rostering and logistical problems for the operation of the abattoir with many of the employees refusing to undertake those tasks. I have had to personally support the production manager, Rick Cavedon, as a result of the FTI activities in circumstances where his sleep and subsequent work performance have been impacted in circumstances where he is stressed and anxious about the demise of the business and the possible loss of his job. By personally supporting Rick Cavedon I am referring to ongoing conversations and check-ins with him to address his negative mindset as a result of what has occurred and his concerns for the future. I also offered Rick two (2) weeks leave. I am of course observing Rick and monitoring his work performance so that I can obtain an objective measure of how he is coping.

30. Many of our employees, including members of the management team live locally and have reported to me and the Company management comments outside of work and whilst in town about the role that they play in the abuse of animals as a result of their employment with the abattoir. The Company has had to reassign employees into different roles to accommodate concerns of employees fulfilling the stunning and sticking job as part of the production process featured on the images captured by FTI. The abattoir doesn't allocate specific positions to employees and rather rolls employees through the different work stations involved in the production process other than these employees who were moved from the stunning and sticking job.

31. Further, the management team of the Company have been placed under significant pressure to ensure that production is able to efficiently and effectively continue, at a time when the Company is now confronted with staff shortages at greater levels than normal, while being faced with the prospect of the proposed further publication of the captured images by FTI. These increased staff shortages are a direct consequence of employees

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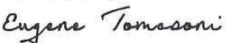
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feeling upset, stressed and anxious about FTI's activities and publications and the prospect of there being further publication of images and unfair and inaccurate commentary that they are engaging in animal cruelty in the course of their occupation [at a time when it is already difficult to attract and recruit employees for these roles. This has been reflected in the comments they have made to me and their managers such as Darren Webb. Such anxiety and stress amongst these employees is resulting in these employees being less productive and taking time off work as sick leave due to being stressed and anxious. An example of an affected employee is Matthew Maguire who refuses to return to that part of the abattoir (stunning/sticking) for fears about being subjected to external commentary along the lines of the types of comments that are already being made on the Facebook page of the company. Matthew Maguire (a local farmer who is deaf and supplements his income working at the abattoir as a stunner) has also informed me, in addition to Darren Webb that he no longer has the confidence to undertake this role because he has become anxious and concerned about that type of commentary being directed towards him on the Company's Facebook page. Exhibited hereto and marked ECT3 are a true and correct copy of the posts made to the Facebook page of the Company as at 24 June 2024.

32. A number of telephone calls have been received by the office as a result of the FTI publications and exhibited to this affidavit and marked "ECT6" is a true and correct copy of an email received from Darren Webb dated 21 June 2024 providing a summary of the details of the calls received by the abattoir.
33. I am aware that correspondence has also been received by the General Manager on 27 June 2024 and exhibited to this my affidavit and marked "ECT7" is a true and correct copy of the correspondence received on 27 June 2024.

Further Harm to the Company

34. Prior to the publication by FTI the Company had an impeccable reputation in the meat Industry illustrated by its loyal supplier base and customer base. The Company has repeat buyers and suppliers on a year in/year out basis based on the reputation for supplying good product which can compete with any product produced by other abattoirs. The Company does not compete on price. Exhibited to this my affidavit and marked "ECT8" is a true and correct copy of a graph showing the buyer percentages of our sales for each buyer of products from the company. To lose one of our longstanding buyers of products from the company would essentially leave the company unable to sell

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that product and uneconomic to operate in a market where there are a known number of buyers.

35. Exhibited to this my affidavit and marked "ECT9" is a graph of weekly production figures from 9 February 2023 until the present time demonstrating the production decline post the FTI publications. I am deeply concerned about how the further publication of the captured images will impact upon the employees of the Company and the recruitment and retention of employees. Such further publication will cause a further significant reduction in the motivation, engagement, morale and productivity of our Company's employees' thereby impacting upon the efficiency and financial viability of the Company's undertaking. Recruitment of new employees will also be impacted by the hostility that will be created towards the Company by some parts of the local community towards the Company and employees of the Company.
36. The Company is one of the smaller goat abattoirs in Australia and is highly dependent for its viability on the suppliers of goats to the business. If the images captured by FTI are widely published as proposed by FTI then it is likely that at least some suppliers of goats would refuse to deal with our abattoir (because of the negative publicity which would also attach to these entities by dealing with the Company,) making it impossible or prohibitively expensive to obtain stock to process through the abattoir. In my experience and knowledge of the meat industry in Australia, gained from over 20 years working in the meat industry, it will simply be easier for suppliers or buyers not to deal with the Company (irrespective of the merits of that publicity) and supply other abattoirs, or purchase meat from other abattoirs so as to avoid the prospect of any negative publicity arising from their dealings with the Company. Once a supplier or buyer of the Company left then it would be very difficult to get them back and there are a number of large abattoirs that could accept the additional goats available from the suppliers. If one or two of the suppliers stopped supplying the Company with goats then the Company will no longer be financially viable.
37. The same is the case if one or two of the larger buyers ceased buying from the Company. I have observed in my lengthy experience in the industry that suppliers and buyers are fearful of the damage that may be caused to them if they are associated with an abattoir which suffers significant adverse publicity and is portrayed to the public as an unethical operator. Part of the reason of the suppliers and buyers being reluctant to trade with the Company in this circumstance is the fear of these entities having their

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operations associated or targeted by groups and organisations such as FTI. SAMEX Australian Meat Exporters buy product from the abattoir and have for over a decade. SAMEX buys approximately 40% of product and the director of that company (the export company) is on the AMIC board. This is an example of a buyer who will be sensitive to publicity raising animal welfare allegations against the Company regardless of whether the publicity is a fair and accurate representation of the Company's animal welfare standards.

38. Widespread publication of the captured images as proposed by FTI is likely to cause the closure of the abattoir or at the least to seriously damage the business for the reasons I have outlined above. The Company is the second or third largest employer in the Bright/Myrtleford area of Victoria and closure would put the Company's employees out of work. The Company also significantly contributes to the local economy by the business it conducts with local businesses such as plumbers, electricians, mechanics, engineering firms, freight companies, workwear retailers, industrial suppliers, fuel suppliers and North East Water. Should the Company ultimately fail as a result of the publication of the images, there would also of course be financial losses for the shareholders of the Company which operates the abattoir in that their investment would become worthless and unable to even be disposed of as a going concern.

Affirmed by the deponent
at
in Victoria
on 28 June 2024

DocuSigned by:

Eugene Tomassoni

Signature of deponent

Before me:

Signed by:

Chris Neville

Signature of witness

Name and qualification of witness

Christopher Wyatt Neville
Solicitor

- DocuSigned by:

Eugene Tomassoni

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Deponent

— Signed by:

Chris Neville

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