



PERFECTION FRESH GROUP
Modern Slavery Statement 2021/2022

This second modern slavery statement (Statement) under the Modern Slavery Act 2018 (Cth) is made by the Perfection Fresh Group in respect of the period from July 1, 2021, to June 30, 2022 (Reporting Period).

MODERN SLAVERY STATEMENT

Perfection Fresh Australia and its associated companies are committed to respecting human rights as set out in the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. We strive to foster safe, inclusive, and respectful workplaces wherever we do business and respect the fundamental rights of Perfection Fresh Group employees, which are: freedom from slavery and child labour; freedom to associate (or not associate) and collectively bargain; equal opportunity for everyone; a safe and healthy workplace; and freedom from discrimination and harassment. Where Perfection Fresh Group may impact the human rights of particularly vulnerable groups, such as migrant labourers, unskilled labourers, indigenous people, women, or children, we are guided by other international standards that elaborate on their rights.

This Modern Day Slavery Statement is published in accordance with Modern Slavery Act 2018 (Cth) and Modern Slavery Act 2018 (the NSW Act). It outlines our approaches to prevent modern slavery in our operations and supply chains.

The principles from the International Labour Organisation Conventions, Protocol, Recommendations, and Instruments, such as the Declaration on Fundamental Principles and rights at work and the UN Guiding Principles on Business and Human Rights, outlined them. The principles address businesses and aim to provide a clear and practical interpretation of international labour standards.

These principles align with our Values of PRIDE – Passion, Respect, Innovation, Discipline, Ethical. These values guide our approach to human rights within our business and supply chain.

We continue to build our knowledge of the risks of modern slavery and identify possible areas of our business that could face these challenges. We work across our business and supply chains to put the correct practices in place to prevent and respond to potential risks. Modern slavery is unacceptable within our business and supply chains. We are responsible for respecting the rights of people who work for the Company, suppliers and business partners to respect the human rights of their respective employees. We recognise there is no single solution to human rights issues, so we must engage with all our stakeholders to build awareness and understanding.



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our Structure

Perfection Fresh Group is one of Australia's leading fresh produce companies, serving the Australian Wholesale Markets, Retail Industry, Aged Care facilities and the Australian public.

Perfection Fresh Group harnesses their passion by growing its produce, engaging with suppliers and employees, and working together to deliver healthy, fresh, innovative produce.

Perfection Fresh Group acknowledges the commitment of our growers and their communities to deliver the highest levels of quality and safety and facilitate knowledge and sharing across more than 9,000 families in our employee's and suppliers' supply chain.

Our operations

Perfection Group Companies:

- Como Group Holdings ACN 65 131 561
- Glasshouse Group Pty Ltd CAN 65131 178
- Como Glasshouse Investments Pty Ltd ABN604272951
- Perfection Fresh Australia Pty Ltd ABN 75 127 389 682
- Como Glasshouse No 2 Pty Ltd ABN 49 604 272 951
- Choice Pack Pty Ltd ABN 78 127 390 425
- Bartel Berries Caboolture Pty Ltd ACN 614 034 749
- Perfection Berries Tasmania Pty Ltd ABN 47 622 822 315
- Perfection Agrifresh ABN 59149811 156
- Perfection Fresh Direct Pty Ltd ABN 50 128 743 895
- Perfection Barwon Pty Ltd ABN 49 622 822 324
- GrowCo Holdings ABN 49 600 368 367
- Perfection Fresh Brisbane ABN 35 129 766 810
- Perfection Fresh Exports Pty Ltd ABN 42 127 390 210
- Perfection Fresh (Hong Kong) Ltd #70489248
- Como Wood Supply ABN 70 603 344 396
- Processing Holdings Pty Ltd ABN 89 600 368 536
- Fruit Master Australia Pty Ltd ABN 77 614 029 953
- Fruit Master Holdings Pty Ltd ABN 92 614 065 655
- Fruit Master Farm Operations Pty Ltd 52 612 363 676
- Perfection Barwon Pty Ltd ABN 49622 822 324
- Organic Foods of Australia Pty Ltd ABN 38 098 229 095
- Agri Administration Services Pty Ltd ABN 70 603 544 021
- D'Vineripe Pty Ltd ABN 50 120 312 049
- Perfection Fresh International Pty Ltd ABN 55 613 632 901

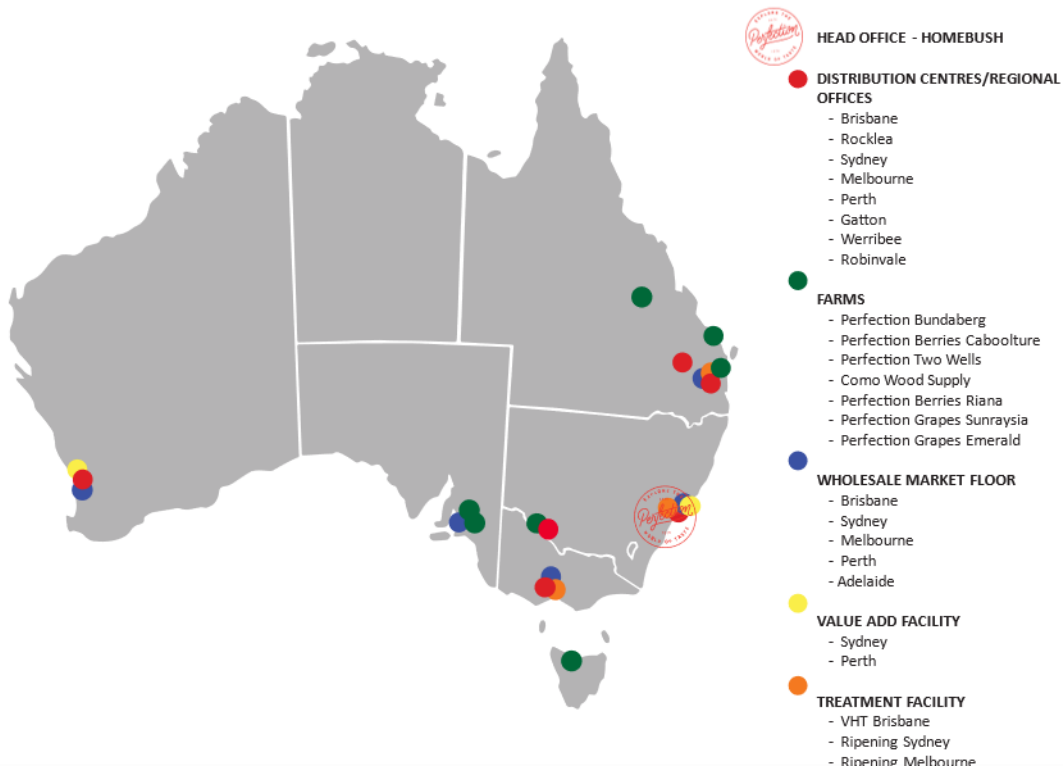
Perfection site numbers: 28

Workers across the business: 2,200 +



Perfection Fresh purchases substantial produce from Australian farmers. Our growers are among the hardest workers in Australia, and so are the workers on their farms. It is essential that we work with them and labour-hire providers. As well as industry bodies such as Growcom, Fresh Produce Alliance, Produce Marketing Australia, National Farms Federation, AUSVEG, auditing companies and the broader industry to ensure that the people who have grown, picked, packed, graded and transported our fresh produce are treated ethically and fairly.

Where we operate



Employees

For the reporting period, Perfection Fresh Group had a total of 738 employees, plus workers sourced through labour hire providers and the seasonal worker program. All these workers either had a contract of employment or were employed under collective work agreements.

During the Reporting period, Perfection Fresh Group sourced workers through 18 labour hire providers and seasonal worker approved employers.

| <u>Sites</u> | <u>Hours</u> | <u>Worker Numbers</u> |
|--------------|-----------------------|--|
| 25 | 440,508 working hours | FTE- 659 Casual – 79 SWP/LH - 1542 |

Our Supply Chain

Perfection Fresh has a diverse supply chain. Within the Group and local strategically aligned supply chain partners, we employ 9,000+ workers, with 57+ languages spoken.

Suppliers are a critical component of the Perfection Fresh business. We build long-term strategic relationships with our supplier partners and are proud that many of them have worked with us for



decades. These long-term relationships enable us to have an open and honest conversations and to share best practices.

We know that a large part of the success of the Perfection Fresh business lies in our trusted relationships with our supplier partners. We expect all suppliers, regardless of the cultural, social, and economic context, to meet our expectations on fundamental rights for all people. This means treating our workers with fairness, respect, and dignity and following practices that protect the health and safety of the workers on their sites.

Under ethical practices, Perfection Fresh Group impacts areas of labour, health and safety, business ethics, and environmental safeguarding.

We are committed to supporting Australian producers and always source within Australia and New Zealand whenever it is viable and appropriate. We are very proud of our reputation as Leaders in Australian Horticulture.

MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

Perfection Fresh Australia recognises that given the complex and diverse nature of our supply chain, modern slavery risks can occur within our supply chains:

In Horticulture, the types of slavery we have identified as being most likely are:

Forced Labour

- Restrictions of movements, intimidation, threats, human trafficking
- Debt Bondage
- The payment of fees for recruitment or associated costs and the retention of identity documents
- Deceptive recruiting for labour
- Workers promised specific jobs, underpayment of wages, benefits, or conditions.
- Unsafe working conditions in the workplace
- No emergency evacuation processes, PPE not supplied, no training for fire evacuation or use of mobile firefighting equipment

2016, we introduced and conducted supplier risk assessments designed to inform our Ethical Sourcing program on areas of focus and risk. These assessments focussed on the inherent risks of exploitation involved in growing and harvesting fresh produce.

Perfection Fresh Group has developed a 3-year Road Map starting in 2020 to mitigate human rights and modern slavery risks for the Perfection Fresh Group operations and within our supply chain. Ethical Sourcing and Due Diligence Framework

| | |
|----------------------------------|--|
| Ethical Sourcing Policy | Is embraced across all our locations and demonstrated our commitment to respecting internationally recognised human rights. It sets out our expectations for the Conduct of our employees and suppliers. |
| Whistleblower Policy | Provides a mechanism that encourages concerns about unethical or illegal Conduct or behaviours by the PFG, its employees, and others authorised to represent PFG. |
| Recruitment and Selection Policy | The recruitment and selection policy is designed to help our recruiters and managers in the PFG develop consistent and equitable recruitment processes to ensure that modern slavery or |



| | |
|-------------------------------|--|
| | human trafficking is not taking place within our business or supply chain. |
| Grievance Procedure | Regular training is delivered to all workers on our sites with a presence on the corporate internet. |
| Code of Conduct | All staff periodically undergo training on the CoC and the business expectation. |
| Supplier Code of Conduct | The CoC sets out our expectations for suppliers on critical topics such as modern Slavery/human rights, business integrity and environmental management. |
| Engaging Labour Hire Provider | Engaging the labour-hire provider's process is an action planning tool to identify and address gaps in systems to manage modern slavery risks. |

Ethical Sourcing Program

Since our last Report, we have made progress on desktop, and third-party external supplier audits based on the ETI Code:

- 87% of our strategically aligned growers have undertaken 3rd party ethical audits
- 97% of all indirect and direct suppliers have completed the ethical self-assessment questionnaires
- 90% of our labour-hire providers on Farms have participated in 3rd party audits, and 100% completed internal due diligence
- All Category sales and supply staff have undertaken training in our approved supplier program.
- All Perfection Farms have scheduled SMETA audits (ETI base code) conducted by 3rd party certified auditors.
- We continue to work with suppliers to identify modern slavery risks in their business and guide them through the mitigation and remediation processes.

Given our progress since our first reporting period, we have gained some leverage within our supply chain. Given this impact, we believe it has improved the working conditions and reduced the modern slavery risks to our workers and those in our supply chain.

Perfection Fresh Group has dedicated a senior manager to drive the ethical sourcing program to ensure the Ethical Sourcing Road Map is regularly revisited and implemented to identify and eradicate modern slavery risks in the Group.

Supplier Code of Conduct

Perfection Fresh Group has introduced a Supplier Code of Conduct and Ethical Sourcing Policy that applies to all suppliers. It sets out our expectations for suppliers on critical topics, including modern slavery/human rights, business integrity and environmental management. The Code forms part of our contractual agreements, which suppliers must agree to. As a result, this will mean much more in-depth procurement processes, the requirement to sign warranties to mitigate liability and undertaking internal and external audits to ensure compliance and identify high-risk categories and suppliers.

Training on modern slavery and human rights

Training and raising awareness on the signs of modern slavery is a crucial focus for the business and our supply chains. Building on the knowledge of our key staff, practitioners, procurement, and category teams who have been given increased responsibility for understanding and mitigating Modern Slavery risk across the business.



Capacity building for our suppliers remains a crucial focus where our risk is the greatest. We continuously consult with industry bodies, Growcom and AUS-QUAL, APSCA, Woolworths Resourcing Project Pilot, Coles Ethical Sourcing supplier requirements and McDonald's Workplace Social accountability program. We continue to consult on the Fair Farms certification program with the Fair Work Ombudsman and Growcom to build an Australian standard for the Horticulture Industry. We participate in the Retail Roundtable and Elevate to identify and work towards mitigating the risk in our industry to ensure eligibility to work, protecting the rights of Migrant labour and implementing Grievance Mechanisms. Perfection Fresh Group is A/B member of Sedex and a member of Sedex's external reference committee.

Employment practices and remediation

Perfection Fresh Group is committed to inclusion, diversity and providing opportunities for all workers. From farm gate to consumer plate, our success would not be possible without the hard work of our people, which is why our people are always treated with dignity and respect. We promote equal opportunity (Gender Equity) to ensure that our employees enjoy a harmonious work environment free from harassment, bullying and discrimination.

We aim to create an environment of open and honest communication with our employees having the opportunity to have their say. We acknowledge that a motivated and engaged team of people in our business is vital when building a great place to work.

Perfection Fresh Group implemented a Whistle Blower Policy in 2019. Development and implementation of internal anti-slavery policies and processes (internal audits) with developed compliant plans to reduce instances of modern-day slavery and build on the awareness and knowledge of our workers.

Monitoring in practice – our Supply Chain

All produce suppliers must submit an annual self-assessment questionnaire (SAQ) on their social compliance management systems, including how they identify and address potential modern slavery indicators. They are reviewed and assessed for trends and possible red flags that may trigger supplier engagement and investigation. External audits ensure compliance with various laws, such as Fair Work Act 2009 Workplace Health and Safety Act, including our enterprise agreement.

Monitoring Self-Assessment Questionnaires (SAQs) for suppliers and service providers (Labour Hire services) is a continuous improvement exercise to enable the provision of evidence to ensure compliance. Group-wide risk assessments are undertaken on all current labour-hire providers and our strategic grower partners.

Engaging with Labour Hire Providers

Contracts for Perfection Fresh Group Labour Hire Providers are reviewed to include specific references to the Perfection Fresh Group expectations for all providers. The framework outlines the process they must undertake before and during the onboarding phase and during their contractual term. They must be registered labour providers, where legislated, and have completed the Perfection Fresh Group supplier due diligence framework before signing agreements. All Labour hire providers are required to adhere to the code of Conduct whilst agreeing to the international human rights standards of the UN Guiding Principles on Business and Human Rights, as well as undertaking internal and external third-party audits as requested.

We understand supply chain audits do not eliminate modern slavery; however, they are one of the tools that prompt further investigation. Our Ethical Sourcing Team reviews each audit report and identifies all non-compliance against the Ethical Sourcing Policy, legislative requirements, and customer standards, including indicators of modern slavery. All non-compliance findings are



escalated for other supplier engagement and investigation. On average, each supplier had three non-compliance issues on-site related to migrant workers, workplace safety and/or excessive hours. In line with our Policy, we communicated our remediation expectations and worked with suppliers to resolve these issues.

Worker engagement

We engage and develop our leaders and workers and our supply chain workers through on-site visits, internal and external audits, and structured meetings with worker representatives. This year, we completed 16 site visits (reduced due to COVID restrictions on travel), assessed 49 external audits and conducted 25 internal audits.

Perfection Fresh is committed to supporting workers in our supply chain to:

- Be protected if they report human rights violations.
- Be educated about their workplace rights, including their right to join a labour organisation of their choice.
- Have access to an effective grievance mechanism to ensure that human rights violations are reported, investigated, and remediated.

COVID 19

Perfection Fresh Group acknowledges there have been additional challenges and risks due to the COVID-19 pandemic increasing the vulnerability of many workers. Perfection Fresh Group implemented a program that allows the temporary transfer of workers under the Health Management Plan within Government guidelines to support our seasonal workers. Third-party external audits continued to be conducted where health orders were allowed.

By collaborating internally with suppliers, employees, and peak bodies to identify best-practice approaches to protect and support vulnerable workers in our operations and supply chains.

Third-party external audits continued to be conducted where health orders were allowed.

This included:

- Employing a dedicated liaison worker (Mama Sue) to work with the seasonal workers in the workplace to supply pastoral care and supply support to the seasonal workers and their support crew.
- Informing and educating workers about modern slavery risks linked to the impacts of COVID-19.
- Redeploying workers to mitigate the impact of workforce reductions.
- Ensuring workers are protected from illness and related impacts by providing, for example, appropriate protective equipment, leave and pay arrangements during periods of self-isolation and, where appropriate, safe locations to self-isolate.
- Supporting the safe return of migrant workers.

Our position

Since our last reporting period, we have made progress:

- 87% of our strategically aligned growers have undertaken 3rd party ethical audits.
- 97% of all indirect and direct suppliers have completed the ethical self-assessment questionnaires.
- 90% of our labour hire companies on Farms have participated in 3rd party audits.
- 100% of labour-hire providers have completed the internal due diligence program.



- All Category sales and supply staff have undertaken training in our approved supplier program.
- All Perfection Farms have scheduled SMETA audits (ETI base code) conducted by 3rd party certified auditors.
- We continue to work with suppliers to identify modern slavery risks in their business and guide them through the mitigation and remediation processes.
- We have completed the Group-wide review of standard supplier contracts to embed modern slavery clauses in our Modern Slavery and Ethical Sourcing Policy to demonstrate the Company's commitment in these areas.
- Developed an engaging with Labour Hire providers procedures and process map highlighting remediation and grievance mechanisms
- We reviewed our current policies, procedures and practices relating to modern slavery and ethical sourcing with leading best practice initiatives by identifying gaps and implementing appropriate action plans.
- Implemented the Supplier Code of Conduct (CoC), setting out our minimum standards and expectations in all areas of corporate ethics, including modern slavery and human trafficking around health & safety, environment, anti-bribery and corruption.
- Added ESG and social sustainability to our corporate objectives with KPIs in place to manage and measure our progress

Perfection Fresh Group has a team of Senior Managers dedicated to driving the ethical sourcing program to ensure the Ethical Sourcing Road Map is regularly revisited and implemented to consistently monitor the identification and eradication of modern slavery risks in the Group.

AS WE LOOK TOWARDS THE FUTURE

Perfection Fresh Group will continue strengthening our approach to managing the risk of modern-day slavery within our businesses and supply chains. We have reviewed our process and policies on protecting human rights, intending to develop more robust action plans to address modern slavery risk. We're using internationally recognised standards, including the UN Guiding Principles on Business and Human Rights, ETI, ILO and the views of external stakeholders, to guide this process.

- Please continue to work with our suppliers to drive improvements within our supply chain, including conducting audits with worker surveys.
- Continue to monitor and promote awareness relating to the provisions of the Modern Slavery Act and the potential risks facing the Company through internal training and presentations to the employees engaged in dealings with the Company suppliers.
- They are ensured that the Company's recruitment policies, procedures and practices are continuously monitored and reviewed to minimise the risk of human trafficking and modern slavery exploitation.

Continuous improvement

We are currently building on this work with the implementation of a supplier review procedure which will include the following:

- We are developing a supply chain audit and verification system whereby the Company will regularly evaluate potential and existing suppliers before entering into an agreement or renewing existing arrangements.
- Conducting regular supplier due diligence by seeking and obtaining written declarations from suppliers confirming that they are not only aware of the Modern Slavery Act but have taken, and will continue to take, positive steps to address the global problems of human



trafficking, compulsory labour, servitude and forced bonded employment and will comply with the provisions of the Modern Slavery Act.

- Undertaking continuous risk assessment based on supplier self-assessment questionnaires and the outcomes of their external third-party audits.

Transparency

Be transparent about our risks and engage with our supply chain by mapping key human rights indicators for strategic supplier alignment for non-produce and produce suppliers.

Disclose any potential or actual situations of modern slavery (ensure worker protection). Address the drivers of modern slavery risks through strategic and collaborative root cause interventions based on evidence-based research.

Partnerships

Partner with our Industry Associations, Customers and Suppliers to support and promote the protection of human rights and socially responsible practices. Partner with and fund targeted community projects that address modern slavery risks and support at-risk workers.

Disclaimer

The purpose of the Statement is to provide general information only as required by the Act and is correct as of the date of publication.

This Statement was approved by the Perfection Fresh Group Board, the principal body for Perfection Fresh Australia Pty Ltd and its associated companies, on March 31, 2023.

Michael Simonetta
Chairman, Perfection Fresh Group
Date: 31st March 2023

Attached

- Ethical Sourcing Policy
- Supplier's Code of Conduct
- Engaging Labour Hire Providers
- Whistle Blower Policy
- Bullying, Harassment and Anti-Discrimination Policy