



MAKE EVERY DAY

Perfection

EST. 1978

FRESH

Modern Slavery *Statement*

2022/2023

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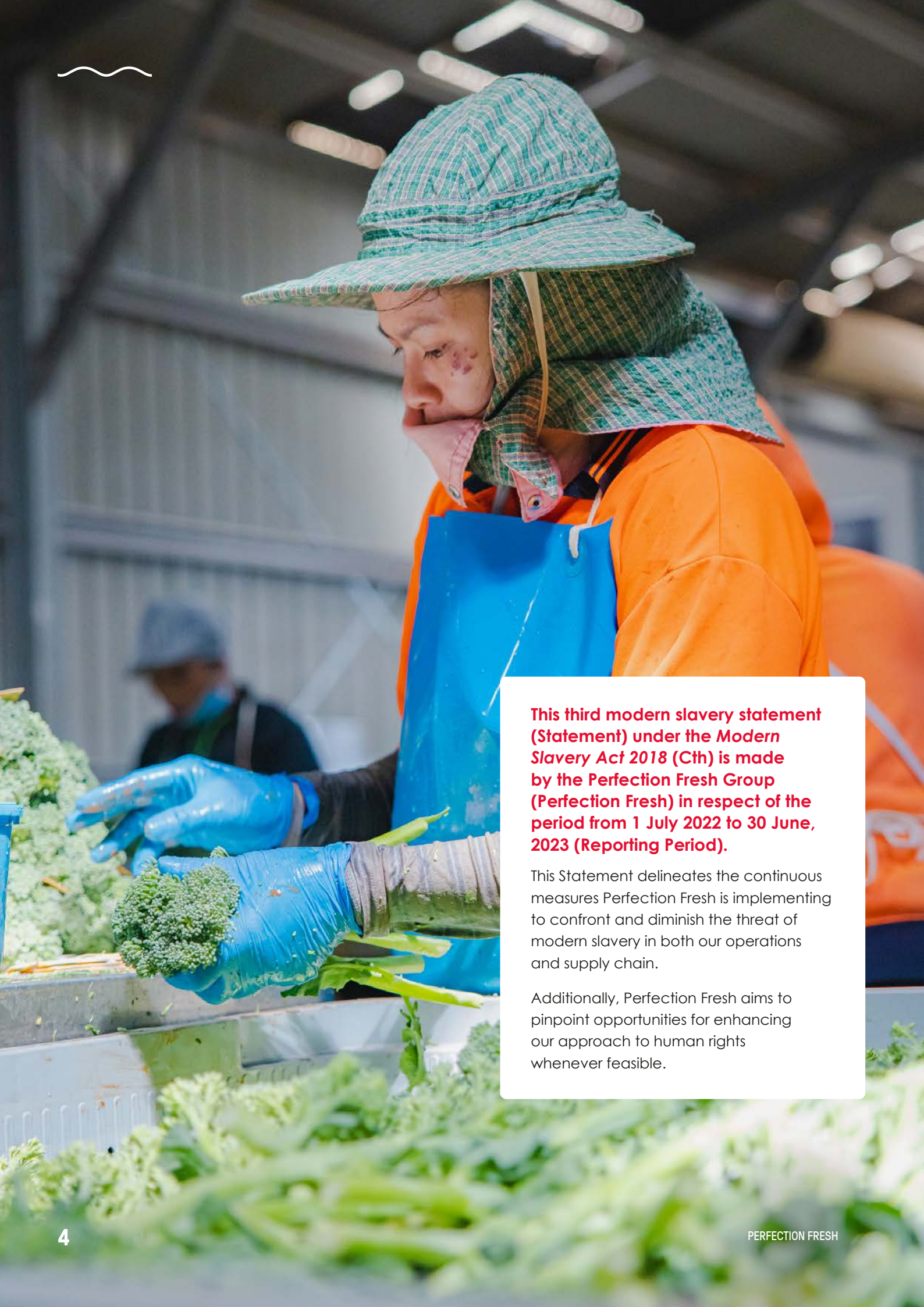
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This third modern slavery statement (Statement) under the Modern Slavery Act 2018 (Cth) is made by the Perfection Fresh Group (Perfection Fresh) in respect of the period from 1 July 2022 to 30 June, 2023 (Reporting Period).

This Statement delineates the continuous measures Perfection Fresh is implementing to confront and diminish the threat of modern slavery in both our operations and supply chain.

Additionally, Perfection Fresh aims to pinpoint opportunities for enhancing our approach to human rights whenever feasible.



MODERN SLAVERY STATEMENT

Throughout 2022/2023, Perfection Fresh's primary focus has been on advancing the understanding and awareness of human rights with our organisation. We have dedicated efforts to ensure that our processes and actions effectively uphold human rights standards. Notably, we have implemented and reinforced the engaging labour hire procedure, which governs the engagement and oversight practices of all labour hire providers (LHPs).

In early 2022, Perfection Fresh established the welfare officer program. This has been instrumental in providing substantial support to our contracted seasonal workers by ensuring consistent employment and welfare standards across the workforce. This is in addition to recognising the importance of providing a safe and welcoming environment.

Longer term, we are investigating the possibility of transitioning our current labour hire workforce to direct employment for the majority of the Pacific Australia Labour Mobility (PALM) scheme workforce to ensure that the frameworks reflect and acknowledge the cultural and operational differences across our Australian sites.

We will continue to collaborate closely with our suppliers and providers supporting them in reporting and responding to issues as they arise.

While we continue to review our progress, we understand the necessity of continuous improvement across our operations. This commitment includes regular reviews of our performance and that of our supply chain to ensure ongoing progress and accountability.

In 2023/2024 we will continue to enhance our understanding of the risks associated with modern slavery and pinpointing potential areas within our business that may encounter such challenges.

Collaboratively, we implement appropriate practices across the business and supply chain to prevent and address potential risks effectively. Modern slavery is unequivocally unacceptable within our business operations and supply chains. As a steward of ethical conduct, we are accountable for upholding the rights of individuals working for Perfection Fresh as well as those of our suppliers and business partners, to ensure the protection of human rights.

Acknowledging the complexity of human rights issues, we recognise the necessity to engage with all stakeholders to cultivate awareness and understanding of the risks of modern slavery and in particular labour exploitation.



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

OUR STRUCTURE

PLEASE REFER TO APPENDIX A FOR THE CORPORATE ORGANISATION CHART OF PERFECTION FRESH.

OUR OPERATIONS

Perfection Fresh is recognised as a premier cultivator and distributor of fresh produce in Australia. Our expansive operations encompass more than 600 hectares of protected cropping and 45 hectares of cutting-edge glasshouse facility across the country.

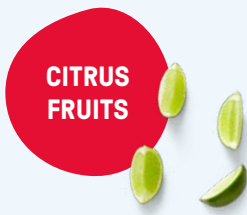
Serving as a vital link in the fresh produce supply chain, we proudly provide a diverse array of specialised fresh fruit and vegetables to major Australian supermarkets, Australian and global corporations (McDonalds, Qantas, HelloFresh), aged care facilities, cafes and independent grocers.

Our business model is founded upon the meticulous optimisation of an integrated portfolio spanning farming, wholesale markets floors, packing sheds and marketing endeavours. With our mission of providing healthy, quality produce to the Australian consumer, our proprietary products are grown on our own farms as well as our strategically aligned partners to ensure the supply of the best quality produce.

Through our comprehensive approach and commitment to excellence, Perfection fresh continues to set the standard for freshness and reliability in the Australian fresh produce industry.

Perfection Fresh plays a vital role in supporting Australian farmers by procuring a significant portion of produce from them directly. Our growers represent some of the most dedicated and hardworking individuals and families in Australia who share the same commitment to excellence.

We recognise the importance of fostering strong, long-term beneficial relationships with our growers, suppliers and service providers, as well as collaborating with industry bodies such as the Australian Fresh Produce Alliance, Produce Marketing Association, National Farmers Federation, AUSVEG, auditing companies and other stakeholder in the broader industry, including the major supermarket retailers.



OUR MAIN CATEGORIES OF PRODUCE



Ethical and fair treatments of all individuals involved in the production process is paramount to us. We strive to ensure those who have contributed to growing, tending to the health of the plants, harvesting, packing, grading and transporting our fresh produce are treated with the respect and fairness they deserve.

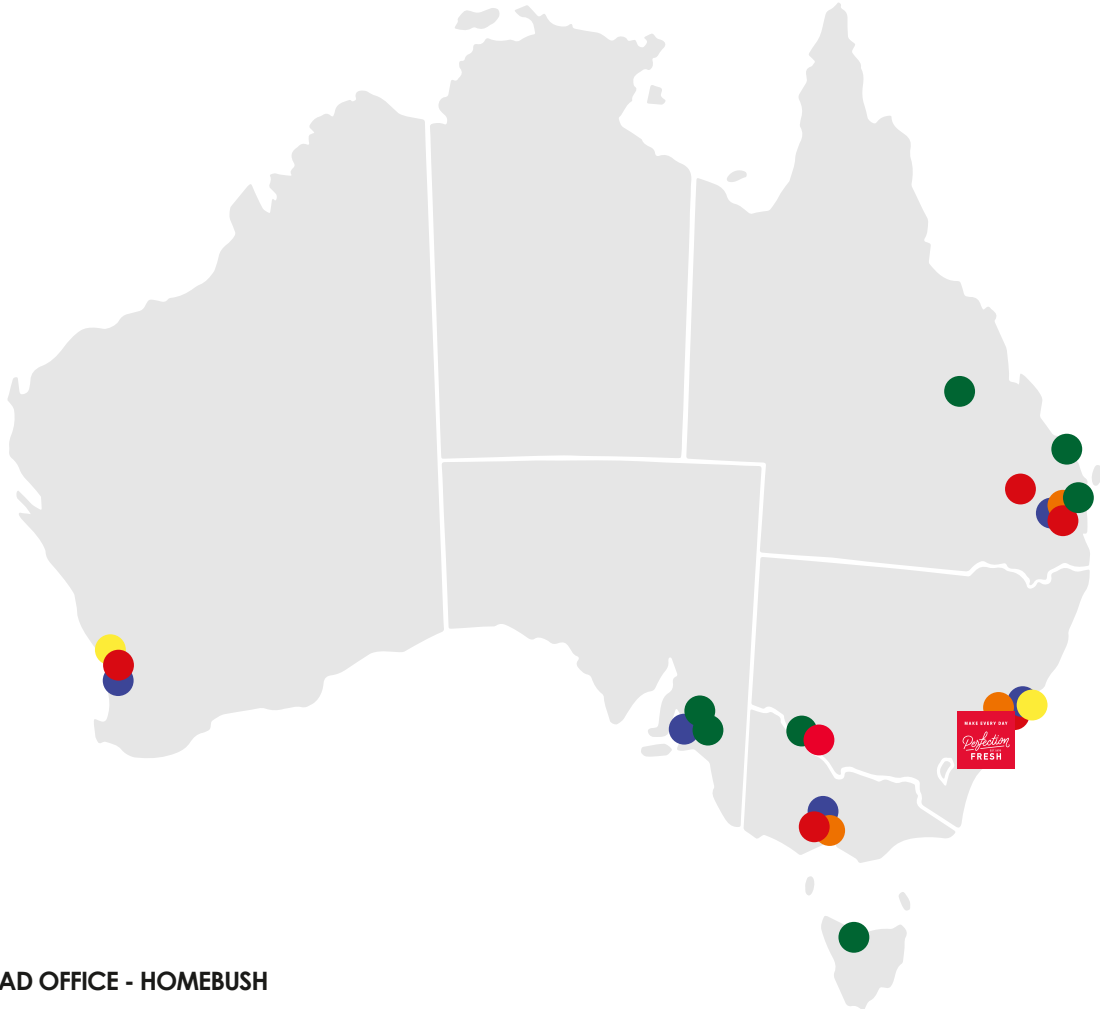
Through ongoing collaboration and adherence to ethical standards, we uphold our commitment to supporting a sustainable and equitable agricultural industry in Australia.

**PERFECTION SITE
NUMBERS: 28**





WHERE WE OPERATE



HEAD OFFICE - HOMEBUSH

- | | | | |
|---|---|---|---|
| <p>● DISTRIBUTION CENTRES/
REGIONAL OFFICES</p> <ul style="list-style-type: none"> • Brisbane • Rocklea • Sydney • Melbourne • Perth • Gatton • Werribee • Robinvale | <p>● FARMS</p> <ul style="list-style-type: none"> • Perfection Bundaberg • Perfection Berries Caboolture • Perfection Two Wells • Como Wood Supply • Perfection Berries Riana • Perfection Grapes Sunraysia • Perfection Grapes Emerald | <p>● WHOLESALE MARKET FLOOR</p> <ul style="list-style-type: none"> • Brisbane • Sydney • Melbourne • Perth • Adelaide | <p>● VALUE ADD FACILITY</p> <ul style="list-style-type: none"> • Sydney • Perth <p>● TREATMENT FACILITY</p> <ul style="list-style-type: none"> • VHT Brisbane • Ripening Sydney • Ripening Melbourne |
|---|---|---|---|



TEAM MEMBERS AND EMPLOYEES

For the 2022/2023 reporting period, Perfection Fresh Group had a total of 750 full-time equivalent employees. This is in addition to workers sourced through labour hire providers and the PALM scheme. All these workers are verified to have a contract of employment or were employed under collective work agreements at a minimum.

Throughout the 2022/2023 reporting period, Perfection Fresh Group sourced workers through 22 labour hire providers and seasonal worker approved employers.

SITES: 28

**HOURS: IN EXCESS OF
1,100,00 WORKING HOURS**

**WORKER NUMBERS:
FTE - 750
SWP/LH - 1500**

OUR SUPPLY CHAIN

Perfection Fresh and its diverse and expansive supply chain, comprising both directly and indirect employed workers employ over 9,000 workers, reflecting a rich tapestry of cultural diversity with more than 57 different languages spoken.

Suppliers play a pivotal role in the Perfection Fresh business, forming the backbone of our operations. We prioritise the establishment of enduring, strategic relationships with our supplier partners, many of whom have been integral to our success for decades. These long-standing connections foster an environment of transparency and trust to facilitate the exchange of best practices.

We recognise that the cornerstone of Perfection Fresh's achievements rest upon the trust and collaboration we share with our supplier partners. Regardless of cultural, social, or economic contexts, we hold all suppliers to the highest standards, particularly concerning fundamentals rights for individuals. This includes the fair and respectful treatment of workers, alongside practices that prioritise their health and safety within their workplace environments.

- Employees across the Perfection Group including seasonal workers: 1,900 (on average)
- Workers across our supply chain: 14,500
- Percentage of workers that are migrant workers: 65.6%
- Number of languages spoken: 57+





MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

METHODOLOGIES AND TOOLS USED TO IDENTIFY THESE RISKS IN THE GROWING, PACKING AND HARVESTING OF FRESH PRODUCE.

- Approved supplier program completed for all new and current suppliers
- Sedex-SMETA audit methodology and risk scores
- Fair Farms Certification audit methodology
- Internal due diligence program for engaging with labour hire providers

AUDITS UNDERTAKEN FY 22/23:

SMETA and Fair Farms Social Audits undertaken	Suppliers: 83 PFG: 9
Suppliers' non-compliances verified and closed FY 22/23	165
Number of strategically aligned growers	300
SMETA members	270
Fair Farms members	30



MAJOR RISKS IDENTIFIED

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

UNLAWFUL DEDUCTIONS

Unauthorised deductions from workers' pay

THE ACTION PLAN

MITIGATE RISK AND MANAGE PROGRESS WITH REAL TIME DATA

Assess modern slavery risks within the business, supply chain and service providers using global, business and industry data to cover issues such as forced labour, business ethics, or gender discrimination.

ACT WITH CONFIDENCE

Data-driven decisions are an integral part of our supplier risk assessment and management process to build visibility of suppliers' risk levels across almost 300 work sites and continuously monitor these at scale to make transparent, ethical decisions about our business and suppliers.

ACCURATELY REPORT

Develop consistent core metrics to track and report progress that aligns with modern slavery legislation utilising comprehensive and analysis tools, such as Radar to provide in-depth insights to drive meaningful impact and track and monitor progress.





KEY PROGRESS IN FY 2022/2023

Enhanced due diligence – Perfection Fresh has enhanced our due diligence program, with particular focus on labour hire providers and PALM scheme employers.

This allowed us to gain better visibility and engagement of our labour hire providers. 100% of all labour hire providers engaged on our farms have completed third party ethical audits.

All Perfection Fresh owned farms have undertaken 2-Pillar SMETA audits (ETI Base Code), conducted annually, by third party certified auditors.

Code of Conduct reinforcement – The Perfection Fresh Code of Conduct and ethics program has been refreshed and delivered to all workers, ensuring clarity and understanding across the business of acceptable behaviours training. Where possible, we make this information available in foreign languages to accommodate our workers.

100% of our supply and sales category leaders have completed their annual refresher training. 100% of all growers and suppliers receive Perfection Fresh's Supplier's Code of Conduct and Ethical Sourcing of Labour Policy on commencement as part of their contractual arrangements.

Induction and education – Perfection Fresh has developed and implemented an induction onboarding education piece that integrates our Code of Conduct with human rights. This educational effort promotes the ETI Base Code and human rights (UNGPs – the United Nations' Guiding Principles on Business and Human Rights) throughout our business, fostering a culture of compliance and ethical behaviour for all new starters.

Risk identification and target setting – Perfection Fresh has identified the highest risk categories within our business and strategically aligned supply chains and we have set annual targets to enable data-driven decisions to focus our resources on the highest priority risks and take action to drive meaningful impact.

Extended due diligence – Perfection Fresh has introduced all new direct and indirect suppliers to the due diligence program in compliance with the Horticultural Code of Conduct, inclusive of human rights (UNGPs), ETI Base Code and International Labour Organisation (ILO).

Responsible sourcing visibility – Perfection Fresh has improved the visibility of responsible sourcing practices, particularly with strategically aligned suppliers, to educate and ensure adherence to ethical standards through mitigation actions to prevent or reduce any future impact on the business.

Co-piloted research program:

The FAIR Hiring Initiative (TFHI) – Perfection Fresh has initiated research into whether excessive recruitment fees for overseas workers are being charged. At time of publication, we are awaiting outcome of this research.

Remediation action plan – Perfection Fresh has developed an action plan where human rights issues or environmental impacts are identified. Steps are taken to put the situation right through remediation.

Actions involve remediation best practice, ranging from apology, compensation, changing practices, to protection from further harm. Engagement with the victim(s) is paramount to avoid further harm and to understand what they see as appropriate remediation.



Mergers and acquisitions focus – Perfection Fresh has developed the mergers and acquisitions human rights framework. This framework enables us to assess and mitigate human rights risks in businesses we acquire, ensuring alignment with our commitment to ethical sourcing practices.

These steps represent Perfection Fresh's ongoing dedication to eradicating modern slavery and upholding human rights throughout our operations and beyond.

ETHICAL SOURCING PROGRAM

Perfection Fresh has a strong commitment and dedication to ethical sourcing, responsible business conduct and the welfare of both workers and the environment. Our sustainable supply chain management framework integrates environmental and social considerations to ensure that the ethical sourcing program resonates with the business commitment to mitigating risks, fostering enduring partnerships, and empowering and supporting suppliers.

The implementation of the program involves establishing ethical standards, incorporating them into contracts and leveraging tools like Sedex for efficient supply chain management. By setting ethical and social principles, Perfection Fresh prioritises the well-being of workers through the business and supply chain.

Ensuring the welfare of workers and the environment is crucial. This commitment drives responsible sourcing practices through ethical supply chain due diligence, employing the Radar methodology. It allows for an analysis of risk(s) at the site-level to ascertain where there are risks and how salient they are. We use this information to determine audit frequency for the next stage of our ethical compliance program.

Undertaking internal and external audits to ensure compliance is essential for identifying any areas of non-compliance or high-risk suppliers. This demonstrates a commitment to continuous improvement and transparency within the supply chain.

WELFARE OFFICER PROGRAM

The establishment of our welfare officer program has proven to be a pivotal initiative in our commitment to supporting contracted seasonal workers.

This program has played a significant role in ensuring consistent employment and welfare standards across our workforce.

Recognising the paramount importance of fostering a safe and welcoming environment, the welfare officer program provides substantial support to our PALM scheme and seasonal workers.

By prioritising their well-being and creating mechanisms for assistance, we aim to promote stability and maintain the dignity of our workforce. Through this program, we demonstrate our dedication to upholding high standards of care and respect for all individuals with our organisation.

COMMUNICATING OUR HUMAN RIGHTS EXPECTATIONS

Policy/Resource	Purpose	Implementation/Updates
Code of Conduct	Sets out the principles, expectations and guidelines for behaviour and decision making for all employees, visitors, contractors and volunteers in the workplace and when representing Perfection Fresh.	Scheduled Code of Conduct training scheduled annually including respectful workplace behaviour face-to-face training session for all workers.
Discrimination, Bullying and Harassment Policy	This policy and procedure are designed to ensure that all employees understand what will be regarded as discrimination, bullying and harassment, how complaints of discrimination, bullying and harassment can be made and how claims will be treated by Perfection Fresh.	Updated in 2022 – all workers' training undertaken in 2023 and included as part of induction program.
Ethical Sourcing Policy	Sets expectations and standards that align with the UNGPs, ETI and ILO for our operations and all direct suppliers in relation to human rights and responsible sourcing, including modern slavery.	Reviewed 2022 and is included as part of a strategically aligned growers' manuals and sent to all suppliers on commencement with Supplier Code of Conduct.
Safety, Health and Wellbeing Policy	Confirms Perfection Fresh's commitment to providing a safe place to work for all workers, visitors, contractors and volunteers. The objective of the safety program is to ensure that all workers, contractors, visitors and volunteers return home in the same condition they came to work. The policy outlines the workplace health and safety responsibilities at all levels within the organisation.	Reviewed and targeted publication date is July 2024.
Whistleblower Policy	Perfection Fresh Group's Whistleblower Policy is an important tool for helping the Group to identify wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing this type of conduct.	Updated in 2023 – all direct employees are required to complete the Code of Conduct training during induction and then again annually.
Supplier Code of Conduct	Sets expectations and standard for all direct and indirect suppliers in relation to human rights and responsible sourcing, including modern slavery. Suppliers must communicate this code to their related entities, suppliers and sub-contractors who support them in supplying Perfection Fresh, so that they are aware of, understand and comply with this code.	Reviewed 2022 and published to provide clarity on Perfection Fresh Group's expectations for suppliers to read, understand and ensure that their business and supply chain meet these standards.
Engaging labour hire/ service providers	The purpose is to give effect to the Perfection Fresh Ethical Sourcing Policy and to outline the specific requirements for the engagement of a labour hire agency for the provision of casual 'on and offshore' labour hire workers hired under agreement, to meet short-term or seasonal labour requirements and/or to address critical labour shortages.	The framework outlines the process the business must undertake before and during the onboarding phase and during their contractual term.



SUPPLIER CONSULTATION

Perfection Fresh is taking a proactive approach to ensuring ethical sourcing and responsible business practices are adhered to throughout its supply chain. By educating and sharing the Supplier Code of Conduct and Ethical Sourcing Policy with suppliers, we are clearly communicating our expectations and standards.

Incorporating these standards into contractual agreement is a crucial step, as it not only ensures the suppliers are aware of their obligations but also makes compliance a formal requirement. The inclusion of warranties to mitigate liability indicates a serious commitment to holding suppliers accountable for any breaches of the Code.

Part of our consultation process involves the quarterly supplier newsletter The Social on critical topics, legislative changes, including modern slavery/human rights, business integrity, compliance updates.

Perfection Fresh's consultation process involves comprehensive discussions on labour practices, ensuring that all stakeholders are informed about our zero tolerance policy towards modern slavery. We initiate this process at the beginning of our relationship and consistently update it thereafter.

We continuously consult with industry bodies, Growcom and AUS-QUAL, APSCA, the Woolworths Responsible Resourcing Project Pilot, Coles Ethical Sourcing supplier requirements and McDonald's Workplace Social accountability program.

We continue to consult on the Fair Farms Program with the Fair Work Ombudsman and Growcom to build an Australian standard for the horticulture Industry.

Perfection Fresh is A/B member of Sedex and a member of Sedex's ANZ external reference committee.

MODERN SLAVERY AND COMPLIANCE TRAINING

Continuous refresher training and awareness across Perfection Fresh on the signs of modern slavery is a crucial focus for the business and our supply chains. Building on the knowledge of our leadership team, practitioners, procurement, sustainability and category teams have been increased. Responsibility for understanding and mitigating modern slavery risk across the business is continuously shared with the aforementioned teams.



MONITORING IN PRACTICE – OUR SUPPLY CHAIN

All produce suppliers must submit an annual self-assessment questionnaire (SAQs) on their social compliance management systems (Sedex/Fair Farms), 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 ETI Base Code, UNGPs, ILO Convention, as well as the *Fair Work Act 2009 (Cth)*, *Workplace Health and Safety Act 2011 (Cth)*, and the Perfection Two Wells Enterprise Agreement 2017.

Monitoring SAQs for suppliers 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.

REMEDICATION

Where instances of non-compliance with Perfection Fresh policies or procedures are identified, the supplier must remediate the issue within an appropriate period of time, determined by the nature and severity of the instance.

Perfection Fresh's audit process supports remediating supplier non-compliance by addressing any issues, which ultimately improves conditions for workers. If a supplier is not willing or able to address instances of non-compliance or it is considered too severe to remediate, Perfection Fresh reserves the right to review the existing agreement(s), with the possibility of terminating the agreement, and/or ceasing supply and therefore no longer accepting produce from the supplier.

MOVING FORWARD ACTION PLAN

As we advance in our efforts to address modern slavery risks, our focus remains steadfast on continuous improvement across our operations.

The groundwork laid by our actions has provided a solid foundation for further enhancements in our approach and systems in 2024. As detailed earlier in this statement, our upcoming initiatives for the year ahead include further monitoring compliance with our ethical sourcing policy, developing and implementing our remediation framework, and integrating supplier risk ratings into our procurement practices. We are deeply committed to harmonising our processes across all of Perfection Fresh's operations.

We will continue to monitor and promote awareness relating to the provisions of the *Modern Slavery Act 2018 (Cth)* and the potential risks facing Perfection Fresh through internal training and presentations to Perfection Fresh employees engaged in dealings with Perfection Fresh suppliers.

Perfection Fresh's recruitment policies, procedures and practices are continuously monitored and reviewed to minimise the risk of human trafficking and modern slavery exploitation.





TRANSPARENCY

Mapping our key human rights indicators gives us transparency about our risks and the ability to engage with our supply chain produce suppliers on those risks.

Revealing potential or actual instances of modern slavery is crucial for safeguarding workers and tackling the root causes of modern slavery risks. This involves strategic and collaborative interventions based on evidence-based research.

PARTNERSHIPS

Perfection Fresh will continue to partner with our industry associations, customers and suppliers to support and promote the protection of human rights and socially responsible practices.

We will continue to partner with and fund targeted community projects that address modern slavery risks and support at-risk workers.

Description	Target to be achieved
% of Growers/Suppliers on Sedex/Fair Farms	100% of all Perfection Fresh direct or indirect suppliers identified as high risk to complete annual third party audits
Advanced awareness training for people in key roles	<ul style="list-style-type: none"> Refresh training for all category/farm/supply managers Train new recruits entering category/farm/supply manager roles within 6 months of commencement
Supply chain awareness training	<ul style="list-style-type: none"> Review grower manuals Update <i>The Social</i> quarterly Supply Chain communications Refresh training to provide education and advice about workplace rights and protections under the <i>Fair Work Act 2009</i> (Cth) and available Fair Work Ombudsman services, to protect and empower vulnerable workers
General awareness training – all workers	Refresh training to provide education and advice about workplace rights and protections under the <i>Fair Work Act 2009</i> (Cth), ETI Base code and UNGPs
SMETA/Fair Farms audits – outcomes	Risk assessments to be undertaken on completion of social audits undertaken – 100%.
Whistleblower hotline	Launch new online information, tools and resources on modern slavery, translated into various foreign languages to all Perfection Fresh workers and site locations – 100%
Employee assistance/support program	Launch new online information, tools and resources on modern slavery, translated into various foreign languages to all Perfection Fresh workers – 100%





ENGAGING AND CONSULTING WITH ENTITIES ACROSS THE GROUP

The development of this Modern Slavery Statement 2022/2023 was led by our ethical sourcing team, with input from a range of teams and functions, including human resources, farm managers, sustainability team, and produce category teams. The ethical sourcing team have facilitated consultation, in relation to the development of this statement.





STATEMENT APPROVAL

This Statement was approved by the Perfection Fresh Group Board on 24 October 2024.

Michael Simonetta

CEO

DISCLAIMER

The purpose of the statement is to provide general information only as required by the *Modern Slavery Act 2018 (Cth)* 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 24 October 2024.

APPENDIX A – OUR STRUCTURE

PERFECTION GROUP COMPANIES:

- Agri Administration Services Pty Ltd
ABN 70 603 544 021
- Choice Pack Pty Ltd ABN 78 127 390 425
- Como Glasshouse Investments Pty Ltd
ABN 49 604 272 951
- Como Glasshouse No 2 Pty Ltd
ABN 47 604 272 942
- Como Wood Supply ABN 70 603 344 396
- D'Vineripe Pty Ltd ABN 50 120 312 049
- Fresh Fruit For You No.2 Pty Ltd
ACN 662 850 339
- Fruit Master Australia Pty Ltd
ABN 77 614 029 953
- Fruit Master Farm Operations Pty Ltd
ABN 52 612 363 676
- Fruit Master Holdings Pty Ltd
ABN 92 614 065 655
- Fruit Master Perfection Pty Ltd
ACN 614 036 574
- Glasshouse Group Holdings ACN 655 131 561
- Glasshouse Group Pty Ltd ACN 65 131 178
- Growco 3 Pty Ltd ACN 622 822 333
- GrowCo Holdings ABN 49 600 368 367
- Organic Foods of Australia Pty Ltd
ABN 38 098 229 095
- Perfection Agri-Fresh ABN 59 149 811 156
- Perfection Barwon Pty Ltd
ABN 49 622 822 324
- Perfection Berries Caboolture Pty Ltd
ACN 608 700 474
- Perfection Berries Tasmania Pty Ltd
ABN 47 622 822 315
- Perfection Fresh (Hong Kong) Ltd
#70489248
- Perfection Fresh Agri-Fresh (Riverina) Pty Ltd
ACN 140 000 862
- Perfection Fresh Australia Pty Ltd
ABN 75 127 389 682
- Perfection Fresh Brisbane ABN 35 129 766 810
- Perfection Fresh Direct Pty Ltd
ABN 50 128 743 895
- Perfection Fresh Exports Pty Ltd
ABN 42 127 390 210
- Perfection Fresh International Pty Ltd
ABN 55 613 632 901
- Perfection Fresh NZ Pty Ltd Company
Number 1974 709
- Processing Holdings ACN 600 368 536
- Processing Holdings Pty Ltd
ABN 89 600 368 536





This Statement was prepared to meet the mandatory reporting criteria set out under the *Modern Slavery Act 2018* (Cth).

The points below identify where each criterion of the Act is disclosed within sections of this Statement.

APPENDIX B

Mandatory Criteria	Page number
Identify the reporting entity	4
Describe the reporting entity's structure, operations and supply chains	6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	10 – 11
Describe how the reporting entity assesses the effectiveness of these actions	12 – 13
Moving Forward	16
Targets	17
Engaging and consulting with entities across the Group	18





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