



MODERN SLAVERY STATEMENT

2020



Introduction

The Modern Slavery Act 2018 (Cth) (the “**Act**”) requires all entities with a consolidated annual revenue of greater than \$100 million to prepare and publish an annual Modern Slavery Statement (“**Statement**”).

This is the first Statement published by Tivoli Investments Pty Ltd (**One Harvest**), and applies to all of the following Group entities:

- Inguz Harvest Pty Ltd
- Harvest FreshCuts Pty Ltd
- Vegco Pty Ltd

One Harvest is committed to ensuring sustainable operations and supply chain that respects human rights.

Our Structure, Operations and Supply Chain

One Harvest is a family owned Australian company that grow, harvest, process and supply our value-add produce to supermarkets and green grocers around the country. Our operations include four facilities, one farm and employ more than 1,000 people. Our product range includes prepacked salads and vegetables, prepared deli salads and fresh-cooked beetroot and potatoes.

One Harvest has a wide range of suppliers providing a breadth of products & services including but not limited to agricultural raw materials, packaging, ingredients, logistics, machinery, maintenance, training, consulting, legal and financial services. These suppliers range from family-owned, small to medium sized businesses, to international organisations. The majority of our suppliers are located in Australia, particularly our large network of growers.





In terms of mitigating, any modern slavery risks in relation to One Harvest's operations, in particular for our workforce, appropriate labour practices are enforced through the following policies:

- One Harvest Code of Conduct;
- Equal Employment Opportunity Policy;
- Discrimination, Workplace Harassment and Sexual Harassment Policy;
- One Harvest Reimbursement Policy;
- One Harvest Annual Leave and LSL Policy; and
- One Harvest Whistle-blower Policy

Further to these, our internal People & Capability Team facilitates recruitment either directly or with the use of reputable recruitment agencies. All employees go through a structured on-boarding process.

Temporary, seasonal and casual staff are appointed directly through labour hire agencies and considered for permanent positions. These services are governed by formal agreements, which include clauses covering the compliance with the Act.

Our Approach

Modern slavery refers to a range of serious forms of exploitation including forced labour, debt bondage, human trafficking and child labour.

One Harvest is collaborating with its suppliers, customers and other relevant stakeholders to promote ethical practices and assist in minimising the risks of modern slavery within its operations and supply chain.

This Statement outlines the steps One Harvest has taken to minimise the risks of modern slavery by implementing the following approach:

Accountability for Modern Slavery Risks & Issues

An Ethical Committee has been established to ensure compliance with the Act, review and address identified modern slavery risks and issues. The committee are responsible for the development and review of the risk assessment framework, review of modern slavery questionnaires completed by suppliers and providing relevant updates to the Board.

Supply Chain Mapping and Risk Assessment

Ensure that the appropriate due diligence checks and risk assessments are performed prior to engaging a new supplier. Staff who initiate and review relationships with third parties are provided with training to apply the supply chain risk assessment process.

Incorporating Modern Slavery into Policies

Modern Slavery Policy and Supplier Code of Conduct distributed to the business and supplier base. When existing policies undergo review or new policies are under development, policy owners are required to identify modern slavery commitments and protections can be incorporated.



Existing & New Suppliers

All existing and new suppliers are to comply with contractual obligations relating to modern slavery, as well as the obligations set out in the Supplier Code of Conduct.

Communications, Engagement and Training

All relevant staff, including the Board, Executive Team and those responsible with engaging suppliers provided communications and adequate training to enhance their understanding of the causes and impact of modern slavery, the Modern Slavery Policy and our approach to limiting the risk of modern slavery within our supply chains and operations.

Reporting Unethical or Unlawful Conduct

Anyone with concerns about compliance, ethical issues, illegal or unethical activities relating to modern slavery are encouraged to report these concerns by making use of the One Harvest Whistle-blower Hotline, with modern slavery compliance built into the Whistle-blower Policy.

Modern Slavery Risks

One Harvest has carried out an initial risk assessment for the purposes of assessing the modern slavery risk in its operations and supply chain during the reporting period. A risk assessment framework was developed, which evaluates all suppliers against the following four key modern slavery risk factors to determine an initial overall risk rating:

1. Vulnerable populations;
2. High-risk business models;
3. High-risk product or service categories; and
4. High-risk geographies

Assessing and Addressing Modern Slavery Risks

The initial risk assessment was performed over 937 suppliers with the vast majority of these suppliers being assessed as having a low overall risk rating.

Some suppliers were identified that have a higher risk of exposure to modern slavery due to the jurisdictions and industries in which they operate. In particular, a number of suppliers operate in the agricultural industry, which is considered to have a higher risk of modern slavery.

On the small number of higher risk suppliers, we carried out further due diligence procedures; including the requirement for the supplier to complete a detailed Modern Slavery Questionnaire, deeper reviews into the supplier's operations and particularly in relation to growers, visits to relevant farm sites.

Assessing the Effectiveness of One Harvest's Actions

Being our first Modern Slavery Statement, our level of understanding of the nature of and risks pertaining to modern slavery has been elevated through the process of completing the Policy and risk assessments that have culminated in this Statement. One Harvest's focus to date has been in establishing due diligence systems to identify, assess and address risks of modern slavery.

As part of our Governance, Risk and Compliance continuous improvement program, One Harvest will review and update, where necessary, any controls, processes and policies that will assist in mitigating modern slavery related risks.

The often hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report, however One Harvest is committed to working with suppliers to remediate any breaches of our Modern Slavery Policy or Supplier Code of Conduct.

COVID-19

From the beginning of the COVID-19 outbreak One Harvest acted swiftly to implement a number of COVID safe controls to protect employees and ensure continuity of operations. These included the following:

- Improved hygiene practices (including the provision of hand sanitiser stations);
- Social distancing;
- Elimination of non-essential visitors;
- Non-essential employees moved to remote working;
- Hold on corporate travel;
- Review of supplier protocols and contingency plans;
- Audit of practices and procedures were actually in place and being adhered to; and
- Regular staff education and communications.

One Harvest considers the overall impact of COVID-19 on modern slavery risks in its operations and supply chain to be negligible. Although there were new consumables added to our supply chain, i.e. hand sanitiser, face masks and safety screens, we continued to engage with largely the same suppliers.

One Harvest continues to take steps to assess and address modern slavery risks during the pandemic through the conduct of modern slavery risk assessments and preparation of this Statement

This Statement was approved by the Board of Directors of One Harvest.

A blue ink signature of Mr J Ray Magill.

Mr J Ray Magill
Chairman

Date: 23 March 2021