



Premier
FRESH AUSTRALIA

**Modern
Slavery
Statement**

Introduction

Premier Fresh Australia (PREMIER) is committed to the practice of good corporate governance and adhering to the highest ethical standards, complying with the applicable legal obligations including and without limitation, the Modern Slavery Act 2018 (Aust) (the Act).

We will not tolerate any forms of coercion, deception, threat, or worker exploitation that undermine the individual and collective freedom of the workforce within our business and supply chain.

PREMIER has prepared a Modern Slavery Statement for the reporting period, financial year ending 30 June 2022, and submitted within 6 months after the end of the reporting period, in accordance with sections 14 and 16 of the Act. This Statement is for the purpose of outlining our commitment and the approach taken to ensure we are taking reasonable steps to demonstrate further maturing of operating standards and processes to minimise the risk of Modern Slavery in our business operations and supply chain.

PREMIER's Modern Slavery Statement is applicable to the Premier Fresh Australia (ABN: 87 004 843 556) and its wholly owned subsidiaries.

About Us

PREMIER is one of Australia's largest, and privately owned fresh produce supply chain companies, providing both its domestic and overseas customers with a single source of supply across a diverse range of fruit and vegetable categories.

Our farming and distribution operations, coupled with major and independent retailer relationships, ensure we reach Australian households with good quality, healthy, fresh produce.

The Group's farm production capacity and grower network spans all Australian States. PREMIER sales and distribution operations include climate-controlled distribution services, packing and advanced ripening facilities, and central market Trading operations in every State and Territory of Australia, excluding Tasmania and the ACT.

PREMIER employ over 600 people directly and through third party labour hire providers across our national group of horticultural farming operations and wholesale distribution of fresh produce.



Understanding our Supply Chain Risks

PREMIER's supply chain includes the production, sourcing, and distribution of fresh produce from farm to major and independent retailers nationwide and international export of Australian fresh produce via freight forwarding.

Our major suppliers of products and services, almost all Australian, with less than 5% international suppliers, include;



- **Growers** – Direct and third-party suppliers of fresh produce



- **Market Agents** – Third-party suppliers of fresh produce



- **Transportation** – Road, air and sea freight



- **Packaging**

- **Labour**



PREMIER has an established Approved Supplier Policy and Program which requires suppliers to acknowledge that they comply with PREMIER's ethical sourcing practices. The plan has been updated to include specific reference to Modern Slavery is being distributed to new and all existing suppliers. PREMIER has a zero tolerance for all forms of Modern Slavery, and this is communicated to all Approved Suppliers and is continuing to develop to incorporate all suppliers, contractors, and business partners.



Risk Assessment and Mitigation

PREMIER is committed to and takes a proactive approach to preventing Modern Slavery Risk from our supply chain. PREMIER's management of Modern Slavery risk, in our operation and supply chain, is guided by our CGPP0002 Ethical Sourcing & Modern Slavery policy as endorsed by the PREMIER Board in May 2021.

Our risk-based due diligence process, constructed with reference to our Ethical Sourcing and Modern Slavery Policy, is part of our broader Approved Supplier Program (QTPP0001 Approved Supplier Policy) and is designed to identify and assess a range of potential risks in the supply chain, including Modern Slavery.



Steps that we have taken to assess and mitigate risk in our supply chain include:



- Working with selected Suppliers within the Approved Supplier Program to audit their business practices to strengthen their internal policies and procedures; including, but not limited to, workers' labour and payroll conditions;



- The ongoing and enhanced review and update of Approved Supplier Agreements to include a Modern Slavery Clause, followed by distribution of the revised Approved Supplier Agreements.

We have assessed our top 100 supplier Modern Slavery positions. We examined their statutory reporting obligations concerning the Modern Slavery Act, in compliance with SEDEX auditing and the existence of internal policies relating to Human Rights and Ethical Sourcing. The annual review process with our Tier 1 and 2 (direct and indirect) suppliers now has a requirement to include discussions relating to Modern Slavery, ensuring Modern Slavery Risks are front of mind for PREMIER and our partners. (Refer to Third Party Supplier Auditing, Page 3).



Policy Framework

PREMIER's policies, procedures and programs listed below reflect PREMIER's values, standards, expectations, and commitment to compliance with Modern Slavery from our own team and our suppliers and are based on national and internationally recognised codes of practice, including Ethical Trade Initiative (ETI) Base Code and the Universal Declaration of Human Rights.

- CGPP0003 Anti Bribery & Corruption Policy
- CGPP0002 Modern Slavery & Ethical Sourcing Policy
 - CGPP0004 Whistleblower Policy
 - CGPP0008 Terms of Trade (Merchant)
 - CGPP0006 Privacy Policy - External
 - QTPP0005 Approved Supplier Policy
- HRPP0005 Equal Employment: Discrimination, Harassment and Bullying Policy
- HRPP0028 Workplace Grievance & Complaints Handling Policy
 - HSWPP0001 Health, Safety & Wellbeing Policy
 - HRPP0029 Wages & Employment Compliance Policy

In addition to the company policies, PREMIER has a range of initiatives that deliver the requirements of the policies and aim to inform, guide, and support the workforce. These include;

Third Party Supplier Auditing

All major Australian retailers require all direct and indirect suppliers (Tier 1 and Tier 2) to be ethically responsible by meeting regulatory requirements with regards to employee and labour hire conditions and management. All PREMIER packing sites and Tier 2 supplier sites must be registered on either of the SEDEX (Supplier Ethical Data Exchange) and Fair Farms ethical databases.

As a Tier 1 supplier, PREMIER is required to complete frequent SEDEX audits at all packing sites. PREMIER's Quality and Technical (QT) team provide support to Tier 2 suppliers to register and complete ethical requirements, and regularly report to major customers to ensure that PREMIER and our suppliers meet all requirements.



Employee Assistance Program

In the recent period, PREMIER engaged a newly appointed Employee Assistance Program (EAP) service provider, Mindfit, who were positioned to provide PREMIER's workforce an enhanced mental health supports services. Access is available to all employees and eligible immediate family members with a range of services and support. It is a confidential and 24-hour service, with support available for personal and work-related issues including performance, dealing with grief, and stress management.

Human Resources Support and Contact Officers

PREMIER's Business Support Human Resources (HR) team is the first point of contact for all general HR queries and support, hrsupport@premierfresh.com.au

The team regularly support and advise managers on a range of employee development, performance management, employee grievance, employee relations and safety and wellbeing matters. Working with the local Health, Safety & Wellbeing Committees, the HR team appoint and train contact officers, who are positioned to provide impartial, unbiased support to all employees and workers, as an alternative support to the management. The national cohort of Contact Officers completed their annual training in October 2021, and each team informed of the appointed Contact Officers at the site.

Wages and Employee Conditions Hotline

The PREMIER Payroll team reviews all wages arrangements as part of the annual Wages Compliance Reporting at the end of each financial year, to ensure compliance against minimum wage requirements across the company's various jurisdictions. These processes are outlined in PREMIER's HRPP0023 Wages Compliance Policy.

All PREMIER workers have access to a Wages and Employee Conditions Hotline displayed onsite and via the national payroll team. All enquiries are ticketed with documented confirmation that the query has been resolved and closed out.



Progress

on our objectives in FY22

Premier encourages an open and honest approach in setting out the actions we have completed and when considering the effectiveness of our efforts. During this reporting period, Premier has continued to advance our controls and processes to assess and address modern slavery related risks within our operations and supply chain. We have developed and implemented an action plan with appropriate measures to prevent, mitigate, address, or remediate modern slavery related risks. The purpose of our action plan is to set achievable standards and to encourage suppliers to identify areas of risk and concern, while also committing to continuous improvement.



Risk Assessment and Mitigation

Premier aims to ensure that our own operations and those of our supply chain partners prohibit and prevent modern slavery practices and comply with legislated requirements. During this reporting period, we have conducted a risk assessment on our produce and non-produce suppliers classifying them as either low, medium, and high-risk suppliers.

The audit was conducted against the below parameters:

- Supplier type
- Supplier size
- Geographical location
- Use of Labour Hire Providers
- Engagement on Sedex / Fair Farms or other ethical platforms

Any areas of risk identified in the Premier supply chain are managed as a matter of priority through engagement with the supplier and subsequent actions to mitigate.

Supplier Engagement

SEDEX and Fair Farms

We are proactively focussed on communicating our ethical sourcing requirements and assisting growers to register with either the SEDEX or Fair Farms ethical platforms for transparency of information and subsequent auditing.

During this reporting period a significant number of Sedex and Fair Farms audits were conducted by our suppliers. In these audits non-conformances were identified and were subsequently remediated within the required timeframe.

An increased percentage of our supplier base continue to be ethically audited against SEDEX SMETA and Fair Farms standards. Assistance and guidance is provided to supply base members to commence registration on either platform.

Approved Supplier Toolkit

We are focused on ensuring our suppliers are educated on modern slavery risks and are aware of the important role they play in identifying modern slavery-related issues. To enhance support and build knowledge we have established an Approved Supplier Program Toolkit which provides further information around ethical audits and aspects required to meet standard and legislative requirements.



Monitoring and Reporting

Supplier Survey

As part of our national supply chain, all suppliers were asked to complete a questionnaire related to their management of and prevention of modern slavery within their operations and supply relationships. PREMIER's National Quality and Technical team and Human Resources team assess all suppliers for modern slavery risk on the basis of key risk factors and questionnaire responses. The supplier survey includes collection of the following information:

- Supplier contact details
- To what extent has Modern Slavery risk been addressed by the business?
- Do employees have written employment agreements?
- Are Labour Hire Providers utilised?
- Name and license number of Labour Hire Providers where applicable and utilised

The survey is in addition to any auditing currently conducted with Labour Hire Providers by the PREMIER Human Resources team.



Labour Hire Audits

Premier continues to use consistent labour hire providers nationally across all sites. Our preferred labour hire providers are required to participate in an internal audit pre-engagement and annually post-engagement. During the reporting period, all providers were required to undertake an internal audit ensuring compliance with Premier's Labour Hire Service Agreement and with all state and federal legislation. Further investigations are undertaken should issues be discovered, followed by appropriate remediation. Service Agreements issued with labour hire providers include reference to Premier's expectations for such providers, including reference to Ethical Trade and Modern Slavery.

Measuring Effectiveness

PREMIER has completed an assessment of Modern Slavery risk as part of PREMIER's Approved Supplier Program, and we will continue with this approach to expand our level of understanding of the nature of risks pertaining to Modern Slavery within our operations and across our supply chain.

As part of PREMIER's usual continuous improvement process and for compliance with the Modern Slavery Act 2018 (Aust), the scope of PREMIER's current internal controls and risk management systems will extend to profile the risk and management of our supply chain partners as it relates to Modern Slavery risk, and to deliver greater oversight of the effectiveness of PREMIER's risk management systems.



Continuous Improvement

As part of our ongoing review of our action plan, our priorities for the next reporting period include;

- Modern slavery training through the implementation of a learning management tool that will allow us to develop training modules for employees and supply partners to complete each year.
- Complete a review of all HPA agreements to include Modern Slavery provisions.
- Continue to work with supply partners that are registered with SEDEX or Fair Farms and assist the remainder to become registered.
- Build on current systems and processes to effectively measure our actions.

Consultation

PREMIER's Board and Audit and Risk Committee retain oversight of PREMIER's Ethical Sourcing and Modern Slavery Policy and mandate that all stakeholders throughout the Group understand and maintain awareness of the Policy, accessed on PREMIER's Intranet and shared file storage system, and communicated through the annual training program as implemented by PREMIER's Human Resources team.

This statement was approved by the board of Premier Fresh Australia on 20 December 2022.

A handwritten signature in black ink, appearing to read 'A. Di Pietro'.

Anthony Di Pietro
Group Chief Executive Officer
20 December 2022