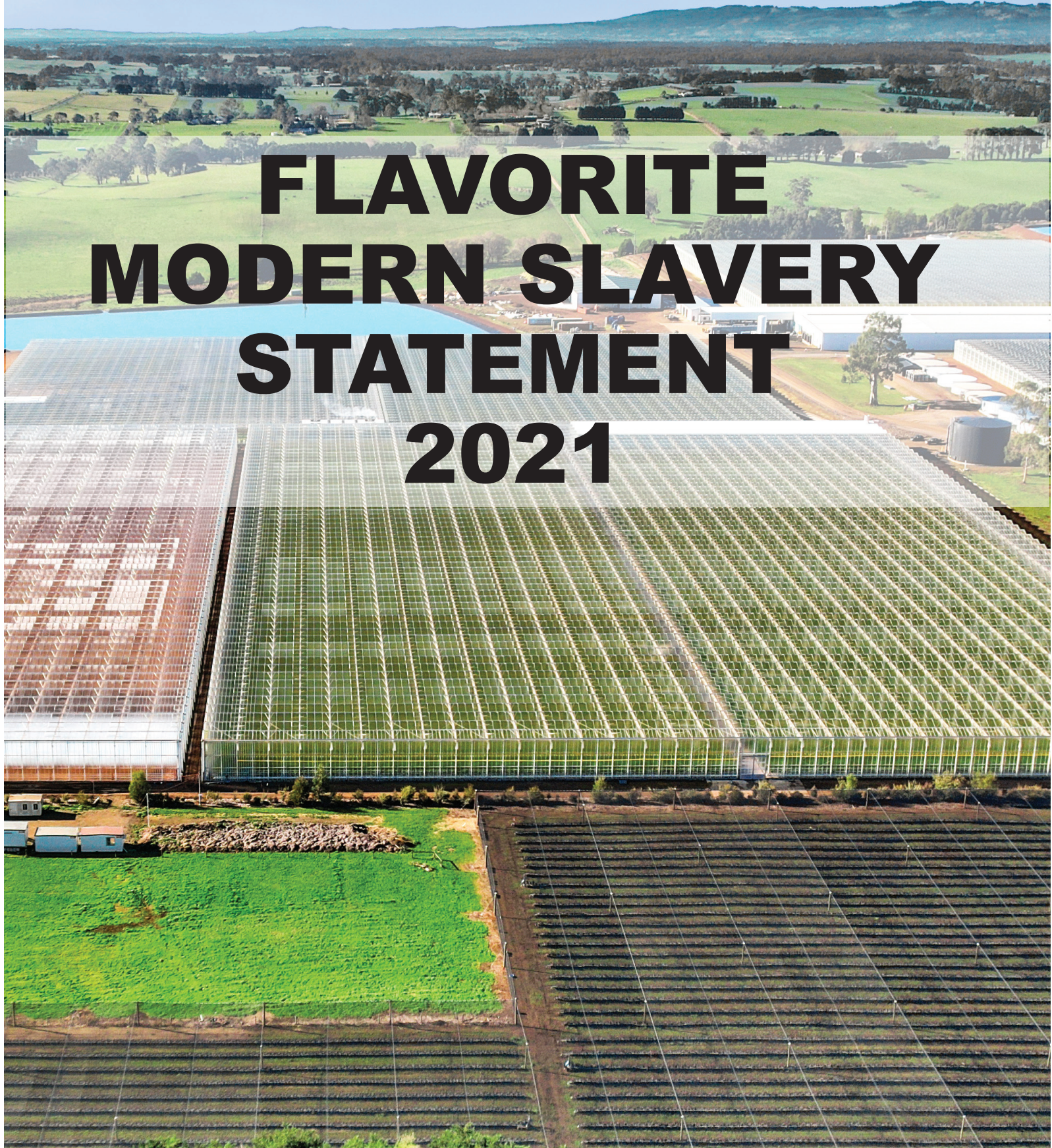




FLAVORITE MODERN SLAVERY STATEMENT 2021



INTRODUCTION

This statement is made pursuant to the Modern Slavery Act 2018 and is published on behalf of Flavorite Bidco Pty Ltd (Flavorite).

The purpose of this statement is to outline our approach for financial year ending 30 June 2021 in ensuring that Flavorite has the necessary frameworks and processes in place to prevent the risks of modern slavery in our business operations and supply chain. Flavorite acknowledges that slavery can occur in many forms as detailed in the Act including human trafficking, slavery, servitude, forced marriage, forced or bonded labour, debt bondage, child labour and deceptive recruiting. Flavorite is opposed to all forms of slavery and we will not knowingly support or conduct business with any organisation involved in such activities.

OUR STRUCTURE

Flavorite is an Australian Company which grows, packs and supplies fresh produce throughout Australia. The combined turnover is in excess of \$100 million. Flavorite Bidco Pty Ltd wholly owns five subsidiaries within Australia, FHAH Pty Ltd, Flavorite Marketing Pty Ltd, Flavorite Hydroponic Tomatoes Pty Ltd, Flavourwave Holdings Pty Ltd and Flavourwave Pty Ltd. Flavorite Marketing Pty Ltd has partial ownership of Pacific Blue Produce Pty Ltd.

The Company locations are as follows:

- Head Office including Sales & Marketing, Finance, Packing and Distribution facility. Located at Ravenhall, Victoria.
- Main Growing, Packing and Distribution facility located in Warragul, Victoria.
- Sales at the Victorian Wholesale Fruit Market, Epping, Victoria
- Growing and Packing facility located at Tatura, Victoria
- Growing facility located at Katunga, Victoria
- Growing and Packing facility located at Mansfield, Victoria
- Blueberry Packing facility located near Coffs Harbour, NSW.

Flavorite has Senior Leaders who deal with matters such as Supply Chain management, Human Resources and Finance across all entities. This allows the team to have a consistent approach to how modern slavery risks are identified, assessed and addressed across all businesses.

We are a private company with approximately 600-750 employees in Australia depending on season.

We are committed to transparency within our business and to promptly dealing with any issues that may arise in connection with modern slavery. We expect the same standards from both our suppliers and our distributors.

BUSINESS OPERATIONS

The business includes the following activities across our supply chain.

Growing

- A number of sites in Victoria grow Tomatoes, Capsicum, Cucumber and Blueberries.
- Growing sites are managed by our own staff. Employees are sourced directly or labour is sourced from a number of agencies.
- We liaise with independent growers to ensure they operate ethically and responsibly

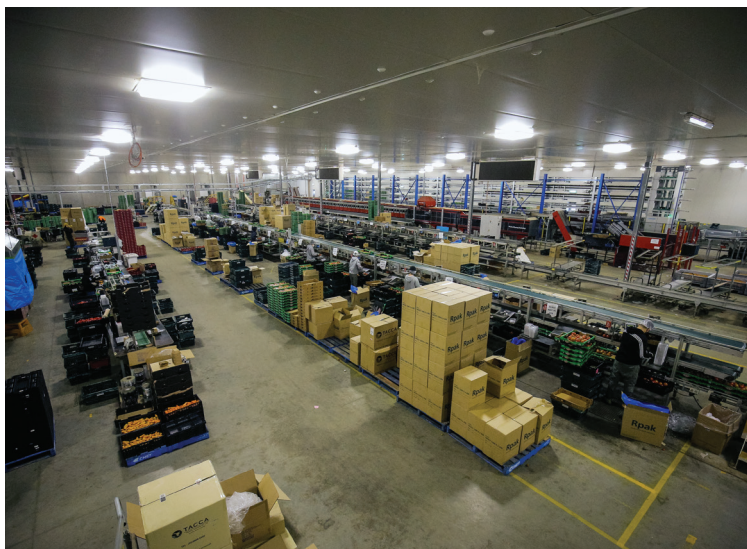


Packing

- A number of sites in Victoria have packing facilities
- The packaging of products is under the Flavorite brand or customer's private label

Distribution

- A number of sites in Victoria have distribution facilities
- Domestic products are delivered to their destination by road
- Produce is delivered directly to major supermarket distribution centres or sold through the Victorian Wholesale Market



Sales & Marketing

- Sales and Marketing fulfil orders to meet customer requirements
- Some produce is sourced from local private growers

Procurement

- Purchasing is conducted by responsible department
- Suppliers and contractors must meet Flavorite requirements

OUR SUPPLY CHAIN

Our supply chain is diverse and ranges from suppliers of raw material for our horticulture facilities and packaged goods through to services provided by contractors for cleaning, transportation, maintenance and the like. Where possible we obtain raw materials locally, however, we have suppliers from European and Chinese sources. Our raw materials and packaging supplies are obtained from suppliers with whom we have a long-term and trusted relationship.

OUR ETHICAL STANDARDS

We are committed to operating responsibly and adhering to high ethical standards. Listed below are existing policies and procedures that provide the framework for the prevention of human rights and modern slavery risks for our employees. These policies reflect our values and set expectations of our employees to ensure a fair and ethical workplace. Employees can raise any suspected concerns regarding unethical behavior or decisions that could indicate potential wrongdoing. Contact details are available for employees to anonymously report any concerns. Due diligence is undertaken before entering a new client relationship particularly in high-risk countries.

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Code of Conduct Policy

Flavorite sets out clear expectations of how employees should behave in the workplace in order to provide a work environment where it is free of any behaviour that is unlawful, unwelcome or destructive.



Grievance Policy

To provide advice on what to do if employees have a grievance and how formal complaints will be dealt with.

Equity at Work Policy

Flavorite endeavours to provide a working environment that promotes fairness, equity and respect and is free from discrimination, bullying and harassment for all employees.

Workplace Health and Safety

Flavorite is committed to maintaining the highest standards in protecting the health and safety of all employees on site.

Recruitment Policy

Flavorite aims to ensure that recruitment and selection decisions are made consistently, fairly and equitably.

Whistleblower Policy

Flavorite provides processes for a safe and confidential environment where concerns can be raised by whistleblowers without fear of reprisal or detrimental treatment.

Human Rights Policy

Flavorite conducts business in a way that respects the human rights of all people, including our employees, the communities in which we are active, and those working within our supply chain. The policy sets out our commitment to applicable labour and employment law.

TRAINING

Training is important in raising awareness of issues around slavery including signs of slavery and how to report concerns. Our education will ensure that all staff are made aware of the company's approach to modern slavery and how they can report any concerns that they may come across.

We will continue to look for ways to increase our staff awareness and have throughout this year created and reviewed relevant policies and kept the Board informed of the Modern Slavery Act and the steps we plan to take as a business.

EMPLOYMENT RISK IDENTIFICATION

The company's growth and success is attributable to the way we do business and whilst we acknowledge horticulture can be a risk sector for modern slavery, we believe our company policies, procedures, practices and values define us as a company with high ethical standards in the treatment of our staff. Our directly employed staff have contracts in place complying with all legal requirements such as minimum wages, hours of work and leave entitlements. We have a component of labour hired through third party labour providers, our expectations of ethical employment practices are clearly defined.

In financial year 2021, Flavorite continued to review potential risk of modern slavery practices across our operations and supply chain taking into consideration factors such as sector, industry, product and service type and geographic location.

Flavorite is committed to undertake audits conducted by external auditors each year, one being the Sedex 4 pillar, which is an Ethical Audit format reporting on Labour Standards, Occupational Health and Safety, Environment and Business Ethics.

RISK MANAGEMENT AND DUE DILIGENCE

The impact of COVID-19 on the business has been noticed with labour shortages and travel re-

strictions which has reduced our ability to physically attend sites and roll out all anticipated plans. Where it has not been possible to implement an action from last year it has been identified for inclusion for this year.

To manage the risks of modern slavery at Flavorite and in our supply chain, Flavorite has undertaken the following measures:

- Reviewed the project plan to assess potential of risk with our suppliers;
- Raised awareness of modern slavery risks within our supply chain, in particular with third party labour providers.
- Continual review of employees right to work by conducting checks before commencement and at appropriate intervals throughout employment.
- Added to our training plan the education of staff on the impacts and risks of modern slavery.

NEXT STEPS / ONGOING ASSESSMENT OF RISK

At Flavorite, we have put in place a system for reviewing this statement on a regular basis to ensure that progress is being made in the areas identified. We will work to collaborate with internal and external stakeholders to prevent and address issues of modern slavery among our employees and suppliers. We will continue to raise awareness of the forms of modern slavery and continue to evolve our due diligence processes to aid in the identification of risk. We will continue to review existing processes and explore new ways to improve identification and action of risk throughout our supply chain.

We plan to carry out and report on the following actions over the next reporting period:

- Further communication with our suppliers to share our expectations and to raise awareness of modern slavery risks within our supply chain;
- Information to be put in place for third party labour providers expressly stating our requirements that any contractor provided is engaged in accordance with relevant statutory employment requirements.
- Develop and roll out a modern slavery training package to our leadership team
- Continue to review and communicate relevant policies
- Incorporate modern slavery into our Sustainability project team and agenda
- Agree to set Key performance indicators which may include:
 - Use of Whistleblower reporting
 - Annual review of recruitment and payroll systems

BOARD APPROVAL

This statement was approved by the Board of Flavorite Bidco Pty Ltd on 24 December 2021.



Mike Nichol
Chief Executive Officer of Flavorite Bidco Pty Ltd