



ANNUAL MODERN SLAVERY STATEMENT 2023-2024

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INTRODUCTION

Mitolo Family Farms is a second-generation family owned fully integrated farming business with over forty years' experience specialising in potatoes and onions.

Our product brands include:

- Carisma Potatoes;
- Mitolo Family Farms Low Carb Potatoes;
- Gourmandine Potatoes;
- Little Tractor Potatoes;
- Comit Farm;
- Scorpion; and
- Blackjack.

Mitolo Family Farms acknowledge that modern slavery can occur in different forms such as human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services. This annual modern slavery statement sets out our comprehensive but evolving approach to combatting modern slavery risks in our business operations and supply chains.

"Mitolo Family Farms recognises the impact that Modern Slavery has on many lives and families and prides itself on its commitment to make a difference in the Horticulture industry to drive change and ensure all human lives are respected and treated fairly"

"Mitolo Family Farms has prepared this Modern Slavery Statement to address the key risks of Modern Slavery within our business to ensure greater awareness and responsibility within our supply chain and our operations to create a better life for all including our customers, team members, supply chain and the community we live and work in."

Frank Mitolo



**CARISMA[™]
POTATOES**

**CARB[™]
POTATOES**

GOURMANDINE



COMIT FARM



Blackjack





MANDATORY CRITERIA ONE AND TWO:

IDENTIFY THE REPORTING ENTITY AND DESCRIBE ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Reporting Entity

This modern slavery statement has been prepared by MFF Consolidated Pty Ltd (ACN 666 543 460) (MFF) and its subsidiaries (Mitolo Group, Mitolo Family Farms).

Structure

Since the submission of the FY23 Modern Slavery Statement, there has been a change in the corporate ownership of Mitolo Group.

Mitolo Group Pty Ltd (ACN 076 809 982) is now the operational entity of Mitolo Family Farms group. There are other non-operational, subsidiary entities within the Mitolo Group, including MFF, Mitolo Family Farms Holdings Pty Ltd (ACN 666 545 008) and Mitolo Holdings Pty Ltd (ACN 007 752 043).

Together, these entities are covered by this Modern Slavery Statement.

The Mitolo Group is headquartered at 1304 Angle Vale Road, Virginia, 5120, South Australia.



Operations

The Mitolo Group transports, washes, grades and packs potatoes and onions and then dispatches and sells to retail and wholesale customers throughout Australia and exports to various countries overseas.

Mitolo Family Farms is concerned with the growing and harvesting of potatoes and onions; the growing, harvesting and selling grapes to wineries; farming and production services; the commercialisation and research and development of potato seed varieties, and the employment of head office business operations.

We have sites in the following states and regions:

Riverland, South Australia

Mallee Region, South Australia and Victoria

Virginia Region, South Australia

Riverina Region, New South Wales

The Mitolo Group and other entities of Mitolo Family Farms directly employ approximately 800 employees, spread across our farming services, vineyard operations, washing and packing facilities, and management and administration functions. In addition, we engage third parties for the supply of labour hire employees to meet the seasonal demands of harvesting and packing fresh produce.

Supply Chains

In support of our business functions as an integrated farming business, we engage a range of suppliers in the general activities of temporary labour services, chemicals and fertilisers, machinery manufacturing and associated repair and maintenance, protective personal equipment and uniforms, telecommunications, office services and business technologies and professional services. Most of our suppliers are based locally in Australia, with a few suppliers associated with our seed tissues and machinery based in New Zealand and Europe.



OUR SUPPLY CHAINS

SEED OPERATIONS

Industry Sector	Product Type/Service	Geographies (External Suppliers)
Horticulture	Labour	Australia
	Seed-tissue cultures	Europe
	Chemicals/Fertiliser	Australia
	Machinery	Europe & NZ
	PPE	Australia
	Uniforms	Australia

GROWING OPERATIONS

Industry Sector	Product Type/Service	Geographies (External Suppliers)
Horticulture	Labour	Australia
	Chemicals/Fertiliser	Australia
	Machinery	Europe & NZ
	PPE	Australia
	Uniforms	Australia
	External Consultants	Australia
	Service Providers	Australia

TRANSPORT OPERATIONS

Industry Sector	Product Type/Service	Geographies (External Suppliers)
Transport	Labour	Australia
	Fuel	Australia
	Vehicles	Australia
	PPE	Australia
	Uniforms	Australia
	Service Providers	Australia

WASHING FACILITY

Industry Sector	Product Type/Service	Geographies (External Suppliers)
Manufacturing	Labour	Australia
	Chemicals	Australia
	Machinery	Europe & NZ
	Packaging	NZ, EU & ASIA
	PPE	Australia
	Uniforms	Australia
	Telecommunications/IT	Australia
	Office Equipment	Australia
	Service Providers	Australia

MANDATORY CRITERION THREE:

DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY AND ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

Our assessment of modern slavery risks is guided by the “cause, contribute to and directly linked to” framework from the United Nations Guiding Principles on Business and Human Rights. We utilise this framework to assess our operational and supply chain risks to determine whether the Mitolo Group could be deemed to have caused, contributed to, or be directly linked to modern slavery or heightened risks of modern slavery.

We have developed a modern slavery risk matrix that we are applying across our business operations and supply chain. The risk matrix enables us to identify specific features of our operations, supply chains and environment that present higher risks of slavery. Utilising this, we are able to differentiate between our operational and supply chain risks.

The risk matrix considers risk factors such as:

- **Jurisdiction risk** – For example, a supplier who operates in Malaysia carries a heightened modern slavery risk compared to a supplier operating in New Zealand.
- **Entity risk** - For example, an entity with labour rights violations or sanctions.
- **Product / service-based risks** – For example, products containing polysilicon which has been identified as a high risk raw material for modern slavery.
- **Sector and industry risk** – For example, the cotton production industry which has been identified as a high risk industry, particularly when linked with certain jurisdictions.



Our risk matrix is outlined below:

RISK CATEGORY	INDICATORS MAY INCLUDE
INDUSTRY SECTOR	Certain sectors and industries, such as the horticulture industry in which we operate, may have higher modern slavery risks because of the nature of the horticulture industry characteristics, products and processes. The horticulture industry has been recognised as a higher risk industry for labour exploitation by various Government Inquiries (eg the Migrant Workers Taskforce Inquiry) and NGOs.
PRODUCT AND SERVICES RISKS	Certain products and services may have higher modern slavery risks because of the way they are grown, produced, provided or used. In horticulture and farming services, this includes various labour-intensive processes involved with harvesting such as grading, packing and storing and the seasonal nature from which these services emerge. Other indicators may include the product made from materials or using services reported to involve a high risk of labour exploitation by international organisations or NGOs.
GEOGRAPHIC RISKS	While our operations are predominantly in Australia, we recognise that various farming activities are carried out in geographic regions with a more limited supply of services, support and amenities than major metropolitan cities. We also acknowledge that in remote locations the industry is more reliant on seasonal workers. In respect of supply chain functions overseas, we recognise that some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty. Indicators may include where the country is reported to have weak rule of law by international organisations or NGOs, including due to corruption, conflict and/or political instability
ENTITY RISKS	We are aware that some entities in our industry may not have formalised or systematic approaches to addressing labour management practices or modern slavery risks. This may be attributed to the prevalence of smaller businesses we work with who do not have extensive human resources or procurement teams, as well as the seasonal nature of our engagements. Despite this, we strive to build long-standing relationships with our suppliers, including smaller entities.
SEASONAL LABOUR MODELS	Some entities may adopt a labour model involving the actual or likely use of labour hire, foreign workers, 'seasonal workers and working holiday makers', temporary workers and contractors who carry out functions that are not immediately visible (eg remote locations, or ad hoc engagements). Such labour models may increase the risk of slavery in the horticulture industry where the nature of the work performed is largely low-skilled or unskilled. Other indicators of risk may also be the absence of a labour hire licence required under relevant state labour hire licensing laws.



Operational Risks

The Mitolo Group understands the horticulture industry, in which it operates, has been identified with higher risks of labour exploitation, increasing the risk of modern slavery. For example, the Federal Government's Migrant Worker Taskforce Inquiry in 2018 identified the horticulture industry as an industry where cases of migrant worker exploitation had occurred. As an organisation, we rely heavily on migrant workers and seasonal workers, which is commonplace in the horticultural industry in which we operate. This, combined with the rural setting in which these employees work, means that operationally, we have a heightened risk of modern slavery.

Whilst there are prevalent modern slavery risks associated with our operations, we operate in a highly regulated industry and are subject to, for example, the Labour Hire Licensing Act 2017 (SA).

We also have strong internal governance frameworks to monitor and address these operational risks. For example, we have:

- grievance mechanisms available for reporting of concerns and grievances (for example, our Whistleblower Policy);
- an extensive policy and procedure framework;
- employee training which trains employees about how to identify modern slavery risks;
- SEDEX audits on our production facilities; and
- a labour hire auditing program.

which are further outlined in Criteria 4 below.

The Mitolo Group will continue to monitor and address these risks. Whilst we operate in South Australia, the Mitolo Group acknowledges that we are not shielded from the impacts or risks of modern slavery, particularly in light of the findings in our industry.



Supply chain risks

Using the risk matrix, we have assessed our highest risk supply chains. The Mitolo Group acknowledges that many of our supply chain risks are more prevalent deeper in our supply chains and thus we have assessed each high-risk supply chain using the "cause, contribute to and directly linked to" framework described above.

Fertilisers and chemicals

Link to Mitolo Group: directly-linked

Certain fertilisers and chemicals carry heightened modern slavery risks because of the risks associated with the production of these goods and the prevalence of forced labour and broader labour exploitation in the industry, particularly when linked to certain jurisdictions (for example, fertilisers originating from Russia).

Personal Protective Equipment (PPE)

Link to Mitolo Group: directly-linked

The COVID-19 pandemic heightened the modern slavery risks in this sector, in particular in relation to forced labour, particularly in jurisdictions such as Malaysia, where there have been findings of forced labour in PPE production plants.

Uniforms

Link to Mitolo Group: directly-linked

The uniform sector poses heightened modern slavery risks, particularly with specific raw material supply chains (for example, cotton and wool). These supply chains are complex and there are different modern slavery risks that apply at each stage of the supply chain.

Seeds

Link to Mitolo Group: directly-linked

Seed supply chains often involve long working hours and exposure to hazardous chemicals and machinery, which heightens the modern slavery risks associated with these supply chains.

Contract labour

Link to Mitolo Group: directly-linked

In addition to the operational risks associated with seasonal labour hire, the Mitolo Group utilises contract labour in its operations. These suppliers carry heightened modern slavery risks due to the lack of control and oversight that Mitolo has over the hiring arrangements of the contractors. Mitolo has implemented detailed processes and procedures to regularly review and audit our contract labour suppliers in recognition of the heightened risk associated with these supply chains in the horticulture industry.

In addition to applying our risk matrix, we have implemented a range of due diligence measures to reduce risks of modern slavery. These are mentioned below under mandatory criterion four.

MANDATORY CRITERION FOUR:

DESCRIBE THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITIES THAT THE REPORTING ENTITY OWNS OR CONTROLS TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

The Mitolo Group has, and will continue to, work in collaboration with key internal and external stakeholders to identify, prevent and address modern slavery risks occurring both locally and around the globe.

The aim of our modern slavery compliance framework is to achieve this by increasing awareness amongst our employees and suppliers as to the different forms of modern slavery risks. We have separated out the action items undertaken during this reporting period based on whether they address our operational risks or our supply chain risks.

The key due diligence measures we have implemented are described below.

ACTIONS TO ADDRESS OPERATIONAL RISKS: DEVELOPING APPROPRIATE POLICIES

The Mitolo Group has implemented a range of policies and processes to identify and reduce modern slavery risks. In the last reporting period, we prepared and implemented an Anti-Slavery Policy that sets out our unequivocal prohibition on modern slavery supported by clear expectations that suspected cases of modern slavery must be reported to designated Mitolo representatives for appropriate action. The Anti-Slavery Policy operates in conjunction with our Ethical Sourcing Policy, Whistleblower Protection Policy, Recruitment Policy, Grievance Policy and Code of Conduct. Our Anti-Slavery Policy and Ethical Sourcing Policy also extend to our suppliers, including contract labour suppliers, and thus they have a dual function of addressing and mitigating our operational and supply chain risks.

TRAINING OF STAFF

The Mitolo Group has commenced a program of modern slavery awareness training for our staff so that we are able to understand modern slavery and identify relevant risk factors in our business and industry environment. We continue to review our current staff and ensure any new staff members in relevant roles are trained in Modern Slavery by completing online training and internal training.

Specifically, we have trained and instructed our staff to identify specific risk factors concerning our association with contract labour used by suppliers our suppliers, ensuring that this training process also helps to address our supply chain modern slavery risks. These include being alert to the following:

- Groups of workers or individuals that are driven to work by an individual who appears to have control over the worker/s, such as by:
 - Talking on their behalf;
 - Requiring workers to work shifts against their will.
- Multiple workers staying at the same location, where there may be warning signs such as:
 - Workers living in substandard conditions;
 - Workers paying excessive accommodation costs.
- Hearing that workers' passports are withheld by employers or hostels against their will:
 - This type of behaviour may alude to servitude in extreme cases, such as preventing a person from having the freedom to leave work or a place of residence).



APPOINTMENT OF MODERN SLAVERY CONTACT OFFICERS

In recognition that our industry relies on seasonal workers who may be working away from metropolitan areas, we have appointed on-site modern slavery contact officers who may be approached by persons with suspected concerns or reports of modern slavery. Once a report is made, it will generally be escalated to relevant persons in the Mitolo Group's management for further action aimed at preventing further harm to the victim.

SEDEX

Mitolo Family Farms is a member of SEDEX – the Supplier Ethical Data Exchange, a not-for-profit organisation.

SEDEX is a global membership organisation that prides itself on making it simpler to do business that's good for everyone. Tens of thousands of companies use SEDEX to manage their performance with labour rights, health & safety, the environment and business ethics.

Mitolo Family Farms hosts SEDEX Audits biannually on all three of our Production facilities, including Angle Vale Road (SA), Taylors Road (SA) and Hillston (NSW). This process allows us to monitor our own operational modern slavery risks whilst also meeting the ethical audit expectations of our customers.

GRASP

The business is also a member of GRASP – The GLOBAL G.A.P. Risk Assessment on Social Practice. This is a voluntary, social/labour management tool for global supply chains which is utilised to evaluate worker wellbeing at the farm level.

GRASP is founded on the UN Guiding Principles on Business and Human Rights and the International Labour Organization (ILO)'s core labour conventions. GRASP audits cover the GRAPS principles and looks at factors such as right of association and worker representation, complaints processes, working hours and time recording systems and the terms of employment documents and forced labour indicators.

ACTIONS TO ADDRESS SUPPLY CHAIN RISKS:

APPLICATION OF OUR RISK MATRIX TO SUPPLIERS

As outlined in Criteria 3 above, we have developed a comprehensive risk matrix of our modern slavery risks that will form the basis for further auditing and monitoring of our suppliers.

The risk matrix acts as first level of risk screening for our supply chain risks. The Mitolo Group will utilise the findings of the risk matrixing process to undertake further due diligence on high-risk suppliers (for example, issuing modern slavery questionnaires to these suppliers) to dive deeper into these supply chains and understand the specific entity related modern slavery risks associated with our high-risk suppliers.

IDENTIFYING OUR SUPPLY CHAIN

We have begun the process of mapping our supply chain for the purpose of the application of our due diligence efforts, such as the risk matrix referred to above. Given we have identified approximately 1,100 suppliers we are planning for this process to be continuous and conducted in stages based on ratings under our risk matrix.



MITOLO'S LABOUR HIRE AUDITING PROGRAM

As referred above, the Mitolo Group recognises that the horticulture industry has been recognised as an industry that is exposed to higher risks of labour exploitation. With this in mind and in addition to our existing policies, we have for a number of years developed and applied a labour hire worker audit program to ensure standards of good practice and compliance with workplace laws are met by our labour hire providers.

This program consists of a random selection of labour hire employees from all labour hire entities who are asked to voluntarily share with us their pay slips and employment records for the purpose complying with relevant workplace laws, including minimum rates of pay, training requirements and VEVO checks.

While this initiative is directed at eliminating labour exploitation, in doing so the program identifies possible risks of more serious crimes associated with modern slavery.

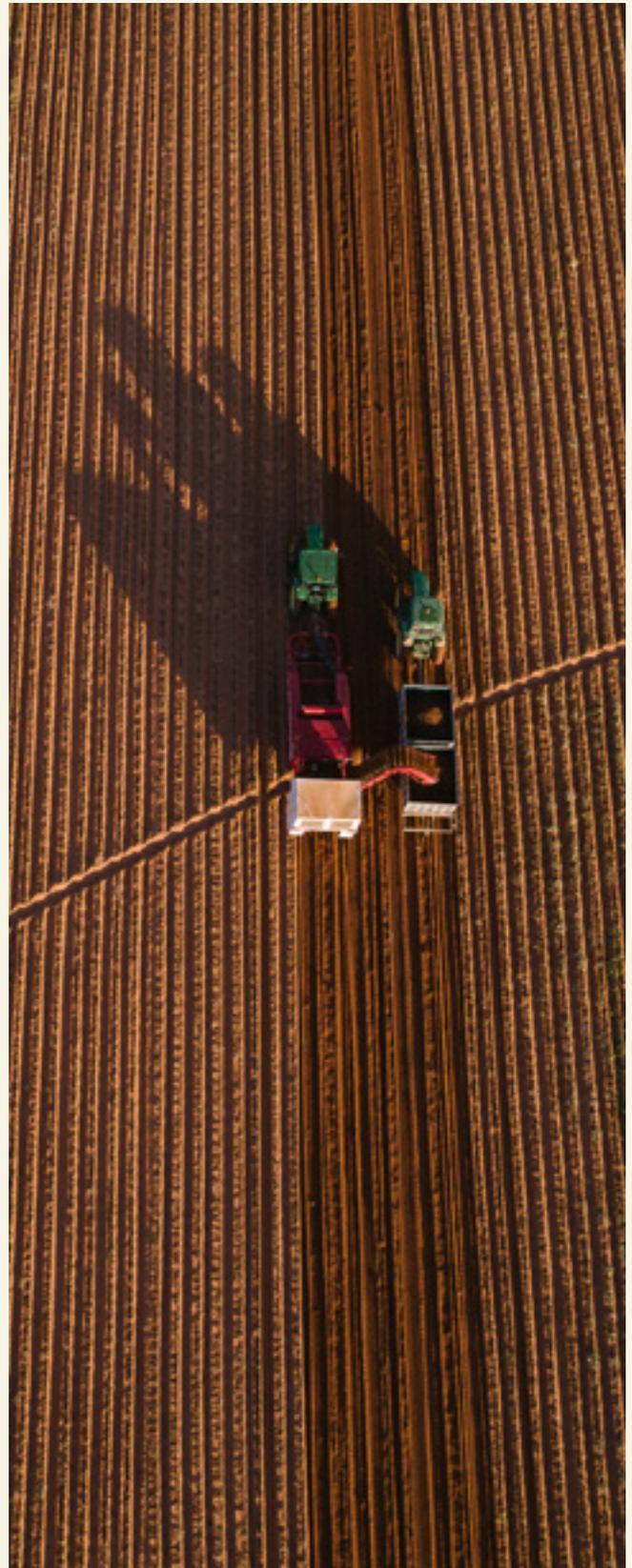
The program highlights to our labour hire employees that Mitolo have a process to discuss if they have any concerns or to raise any modern slavery breaches, they may have with the labour hire company. Labour hire employees are comfortable with the process and voluntarily provide information to ensure employees are paid correctly and are treated fairly.

REMEDIATION

If modern slavery is found to have occurred in our operations and/or supply chains, we will, where appropriate, adopt a remedial approach to prevent further incidents and to ensure safety of the victim. We may also exercise remediation in suspected cases of modern slavery including in the absence of a criminal conviction, or formal court finding.

Where possible, we will work with suppliers to identify how modern slavery has occurred and to implement measures to prevent future incidents.

We may also elect to end engagements with suppliers who refuse to co-operate or comply with our Anti-Slavery Policy or Ethical Sourcing Policy. This continues to be our approach if breaches of our policies and processes are identified through the risk assessment process.



MANDATORY CRITERION FIVE:
DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF
ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

The Mitolo Group has developed a range of key performance indicators (**KPIs**) that assist us measure the effectiveness of our due diligence efforts to identify and reduce modern slavery risks in each reporting period. The KPIs include:

- Measuring the frequency of our internal and external training processes, particularly for our staff with allocated responsibilities relating to modern slavery risk identification and assessment;
- Assessing the number and nature of complaints or reports received under our Anti-Slavery policy or under other relevant policies, eg Whistleblower Protection Policy.
- Conducting internal audits and monitoring of specific steps we have taken to assess and address modern slavery risks. eg Audit prequalification checks on our suppliers;
- Measuring the number of supplier contracts we have updated to reflect awareness and assessment of modern slavery risks;
- Monitoring and tracking responses from higher risk suppliers to check how they are progressing and any actions they have put in place;
- Annual checks of our risk assessment process to ensure they remain up to date;
- Where appropriate, partnering with an industry group, external auditor, or trusted NGO (non-government organisation) to undertake an independent review of our actions;
- Engaging with any regulatory developments aimed at protecting migrant workers or reducing labour exploitation in our industry.

These measures are in addition to creating processes to provide regular engagement and feedback between key areas of the business such as (Quality, HR, Procurement and Legal) and to implement senior management reviews.

We will continue to evolve our due diligence processes to ensure that we continue to identify key modern slavery risks in our organisation and supply chains to, expand the scope of our supply chain risk assessment. As part of this, we will continue to review existing policies and processes and developing ways to improve the identification of, and the actions undertaken in response to modern slavery risks.



**MANDATORY CRITERION SIX:
DESCRIBE THE PROCESS OF CONSULTATION WITH ANY
ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS**

As described above, because of a corporate restructure that occurred during this reporting period, Mitolo Group is the only operational entity within the broader group. Accordingly, as these entities are not operational, this criterion is not applicable.

**MANDATORY CRITERION SEVEN:
ANY OTHER RELEVANT INFORMATION**

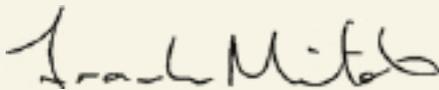
FURTHER ACTION

The Mitolo Group is committed to continuously improving our oversight over, and mitigation of, the modern slavery risks in our business operations and supply chains.

In the next reporting period, our key focus will be on diving deeper into our high-risk supply chains by undertaking further deep dive due diligence on the high-risk suppliers identified during the risk matrixing process.

APPROVAL OF THIS STATEMENT

This annual modern slavery statement for the reporting period 2023-2024 was approved by the principle governing body of MFF Consolidated Pty Ltd, being a group of members with primary responsibility for the governance of Mitolo Group.



18 December 2024

Signed by the Managing Director
Responsible member of the principal governing body
Frank Mitolo
Mitolo Group
18 December 2024

Date of approval





MITOLO
FAMILY FARMS

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