

Lite n' Easy

A healthier n' happier Australia



Modern Slavery Statement 2023

A JOINT STATEMENT FOR THE LITE N' EASY GROUP

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Registered Address:

Lite n' Easy, 18 Buchanan Road, Banyo, QLD 4014
(07) 3267 9292 | Liteneasy.com.au

Our Vision

A healthier n' happier Australia

Our Mission

Bringing great people together to deliver innovative food solutions that help Australians live better every day

Lite n' Easy excels when each of us comes to work to perform at our best. When we perform at our best together, we achieve success. This applies to our dedicated team of people across our business, and our supply chain, who work hard every day to deliver our Vision and our Mission to support our customers in the areas that matter most to them.



01.

Message from the CEO

I am pleased to present Lite n' Easy's 2023 Modern Slavery Statement.

In our 37-year history, we have diligently worked to establish a successful and responsible business. We have recognised the importance of taking a firm stance against modern slavery, viewing it as both a moral obligation and a fundamental part of our commitment to responsible business conduct.

In financial year 2023 (F23), we reaffirmed our commitment to Environmental, Social, and Governance (ESG) principles to further assume our role as a socially responsible corporate citizen. We understand that our ethical practices must reach beyond our own operations extending to the relationships we maintain with our suppliers and their extended networks.

This year signifies an important development in Lite n' Easy's journey towards ethical sourcing and anti-slavery practices. We have initiated our first targeted program of supplier due diligence adopting the tools of the Social Responsibility Alliance (SRA). This program represents a notable milestone in our anti-slavery and ethical sourcing efforts, signalling our dedication to upholding human rights, preserving human dignity, and promoting fair labour practices both within our company and throughout our supply chain.



Concurrently, we have invested in employee training aimed at enhancing awareness and understanding of modern slavery indicators and our obligations. This investment equips our workforce to be vigilant in identifying and reporting any concerns.

In F23 we advanced our understanding of the contribution that Lite n' Easy can make toward the United Nations Guiding Principles on Business and Human Rights (UNGPs) and Sustainable Development Goals (UNSDGs). We firmly believe that change begins locally, within our workplaces and communities, with the potential to create global impact.

This report summarises Lite n' Easy's initiatives during the reporting period 1 July 2022 to 30 June 2023. It serves to reflect how our anti-slavery efforts are influential in shaping our corporate responsibility agenda and our broader dedication to ethical and sustainable business practices.

A handwritten signature in black ink, appearing to read 'Nathan Hayman', with a long horizontal stroke extending to the right.

Nathan Hayman

Chief Executive Officer

Lite n' Easy at a Glance

Lite n' Easy has a wide-reaching manufacturing footprint in Australia, servicing each major city with both frozen and fresh meals. We deliver delicious, healthy food for all Australians to enjoy.



QUALIFIED TEAM OF

DIETITIANS
&
CHEFS

DEVELOPING MEALS



To find out more about our business visit liteneasy.com.au

02.

Reporting Entities

This Statement has been published in accordance with the *Modern Slavery Act 2018* (Cth) (MSA or Act). It identifies the steps the Group took to identify, assess, mitigate and remediate modern slavery risks in its operations and supply chain during F23. Lite n' Easy makes this joint Modern Slavery Statement (joint statement or statement) on behalf of the reporting entities listed below.

As a joint statement, made under section 14 of the Act, we refer to a number of reporting entities:

Company	Reporting entity or Voluntary reporting entity
Lite n' Easy Pty Ltd ACN 010 655 820 and its subsidiaries <ul style="list-style-type: none">• Lite n' Easy (VIC) Pty Ltd ACN 153 499 579• Lite n' Easy (NSW) Pty Ltd ACN 165 076 380	Reporting entities
Lite n' Easy (QLD) Pty Ltd ACN 066 985 073	Reporting entity

We use 'Lite n' Easy' or 'Group' when collectively referring to the above entities throughout this statement.

This joint statement was signed by Graham Mitchell in his role as the Sole Director and principal governing body of each of the reporting entities on 31 October 2023.



Graham Mitchell

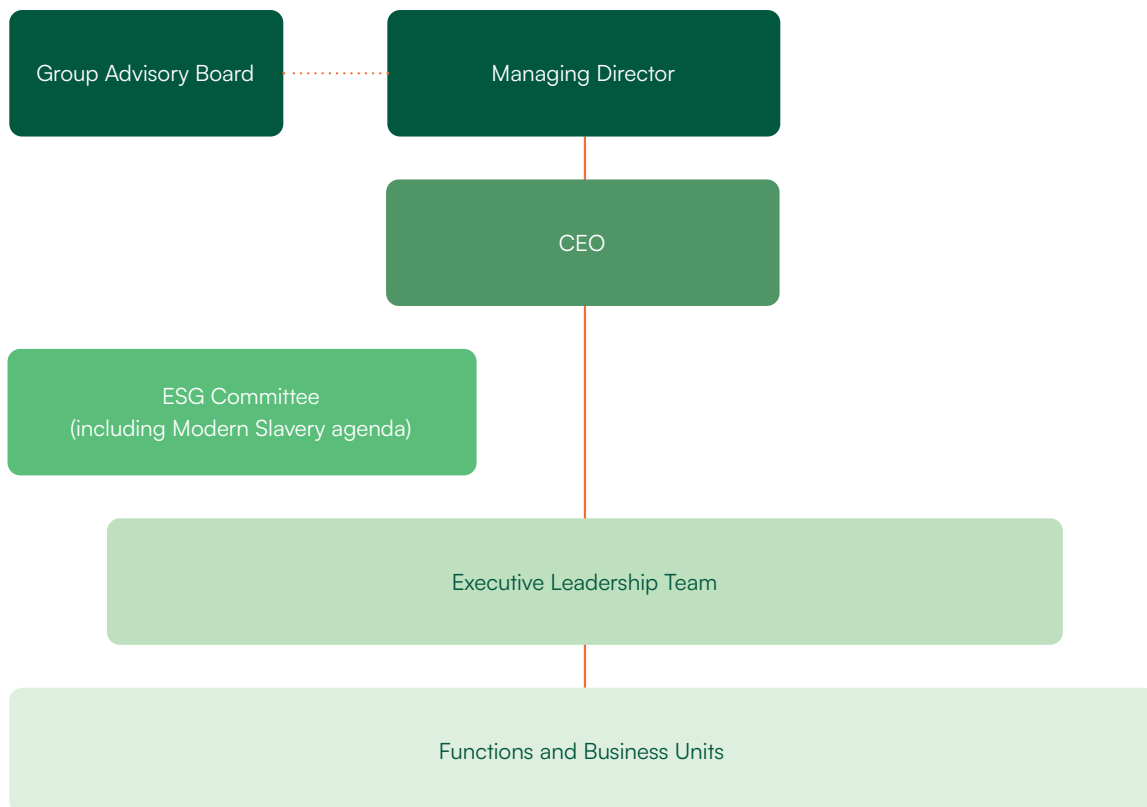
Managing Director of Lite n' Easy Group

03.

Structure, Operations and Supply Chains ✨

Our Structure & Governance

Lite n' Easy Group is a private, non-consolidated group of companies with headquarters in Banyo, Queensland. All reporting entities have an ultimate common shareholder and leadership team.



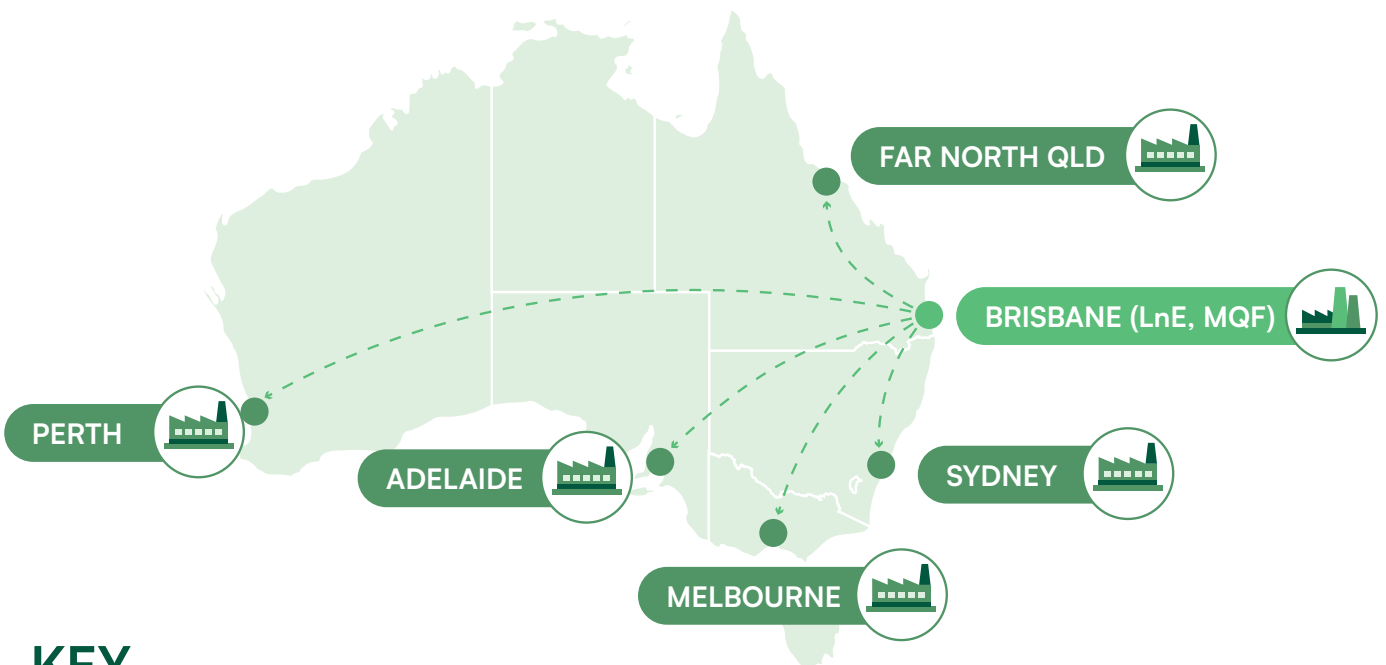
Our risk assessment and management approach are consistent across each of the Lite n' Easy entities covered by this statement. All policies, systems and processes are designed to be applied across the Group. Our ESG Committee oversees matters relating to social governance including reviewing our approach and compliance with the MSA.

Our Operations

We produce more than 1.5 million meals every week in our 6 state-of-the-art kitchens nationwide. With headquarters and central manufacturing in Banyo, Queensland the company has five contact centres around Australia and meals are 'made to order' within each state.

Shared head office functions, executive, and manufacturing of all Lite n' Easy frozen meals is centralised in Brisbane. We source fresh produce, raw materials, and service providers to manufacture and deliver nutritious meals direct to customers and aged care facilities. Our key brands include Lite n' Easy, My Choice, Taste Express and Lite n' Easy Select.

Our workforce comprises more than 1700 team members, the majority of which are employed full-time across our 6 sites in Brisbane, Sydney, Melbourne, Adelaide, Perth, and Townsville. Our operations are wholly based in Australia, we do not employ anyone outside of Australia.



KEY



MQF facility manufactures frozen food - shipped to state sites for distribution



State sites manufacture fresh food and assemble/pack meals for distribution across their state



Our Supply Chain

We source high quality ingredients, raw materials, and services from both trade and non-trade suppliers.

We view and require our supplier relationships to be both strategic and ethical partners to the business. We predominantly source the meat, vegetables, fruit, and dairy used in our meals locally from within Australia. Our packaging, snacks and portion-controlled items are also manufactured in Australia, using local and imported raw materials. These suppliers have a long-standing reputation within their industry and are aware of modern slavery obligations. We also have non-trade suppliers providing various goods and services to our operations which includes corporate services, IT and property management.

Our Tier 1 suppliers fall within the following groups:

- ✓ Fruit & Vegetable
- ✓ Ingredients
- ✓ Meat & Seafood
- ✓ Packaging
- ✓ Freight & Stores
- ✓ Energy & Utilities
- ✓ Consumables
- ✓ Waste
- ✓ Trades & Services
- ✓ Property, Plant & Equipment
- ✓ Corporate Services
- ✓ ICT
- ✓ Other

Our procurement model is both centre-led and decentralised. High volume, high spend category purchases are mostly centre led, while site-specific purchases are decentralised where subject matter experts hold responsibility for departmental purchases.



04.

Risks of Modern Slavery Practices in our Operations and Supply Chains ✨

We are committed to continuously improving our risk identification capability and do this through our ESG Committee in consultation with category specialists. Lite n' Easy recognises that addressing risks in the supply chain requires a long-view commitment to address risk appropriately over time.

Our team members benefit from working in state-of-the-art manufacturing facilities that are 100% located in Australian capital or regional cities. We consider our operations to be low risk for potential human rights breaches. Where possible we source our raw materials domestically with the majority of our Tier 1 suppliers being Australia-based.





Our Operations - F23 Focus Areas

Supply groups within our operations at higher risk of modern slavery practices:

Group	Risk Level	Potential Risk Area	Mitigation approach
INTERNAL LABOUR RECRUITMENT	Low risk	Low skilled labour — LNE facilities with low-skilled workers <ul style="list-style-type: none"> • Exploitation of low-skilled workers • Excessive working hours 	<ul style="list-style-type: none"> • VEVO right-to-work checks for new team members that are non-Australian citizens or permanent residents. • English proficiency. • Skills training and development. • All workers are paid per national awards or Enterprise Agreements.
MIGRANT LABOUR RECRUITMENT AGENTS Labour agents supplying temporary migrant labour e.g., Pacific Australia Labour Mobility (PALM) scheme workers Supplier type: Tier 1	Low risk in Australia	Tier 1 Direct Suppliers — Labour Hire <ul style="list-style-type: none"> • Exploitation of migrant workers • Deceptive recruitment • Underpayment of wages • Excessive working hours 	<ul style="list-style-type: none"> • Utilise labour agents experienced in visa verification and placement of PALM workers. • Contract clauses covering MSA compliance. • Visa verification by the agency. • Representative on site as their 'Welfare and wellbeing support officer'. • On-site onboarding, training, and safety inductions.

Whilst Lite n' Easy did not employ international workers during F23 we commenced engaging with recruiters experienced in the Pacific Australia Labour Mobility (PALM) scheme. Lite n' Easy's first cohort of migrant labour is planned to start in F24.

Our Supply Chain - F23 Focus Areas

Supply groups within Tier 1 (i.e., suppliers who trade directly with us) of our supply chain known for higher risk of modern slavery practices:

Tier 1 Suppliers	Risk Level	Potential Risk Area	Mitigation approach
<p>FRESH AND SEASONAL PRODUCE</p> <p>Domestic suppliers of fresh fruit and vegetables</p>	Low risk in Australia	<ul style="list-style-type: none"> • Exploitation of migrant workers • Deceptive recruitment • Underpayment of wages • Excessive working hours 	<ul style="list-style-type: none"> • Fresh produce is predominantly sourced within Australia. • Established partnerships and strong relationships with horticultural suppliers. • Supplier assurance processes by our Supply Chain and Technical teams.
<p>IMPORTED PRODUCT</p> <p>Australian-based importers of:</p> <ul style="list-style-type: none"> • Fresh produce • Ingredients • Packaging 	Medium to high risk where global supply chains exist	<ul style="list-style-type: none"> • Exploitation of workers • Deceptive recruitment • Underpayment of wages • Excessive working hours • Restricted freedoms • Abusive conditions • Debt bondage • Child labour 	<ul style="list-style-type: none"> • Established partnerships with suppliers. • Supplier assurance processes by our Supply Chain and Technical teams. • Ethical sourcing due diligence (STRT).



Our Supply Chain - Future Focus Areas

A number of other supply groups within Tier 1 of our supply chain known for higher risk of modern slavery practices that have been flagged to commence our ethical sourcing due diligence program in future years include:

Tier 1 Suppliers	Risk Level	Potential Risk Area	Mitigation approach
<p>MEAT PROCESSING</p> <p>Domestic suppliers of meat products or render services</p>	Medium to high risk in Australia	Recognised as potential risk but not yet mapped.	Ethical sourcing due diligence to commence in future.
<p>IMPORTED PRODUCT</p> <p>Australian-based importers of:</p> <ul style="list-style-type: none"> • Personal protective equipment (PPE) • Packaging • Electronics • Plant & equipment • Cleaning products 	Medium to high risk where global supply chains exist	Recognised as potential risk but not yet mapped.	Ethical sourcing due diligence may commence in future.



05.

Actions Taken in F23 to Assess and Address Those Risks ✨

Lite n' Easy is a socially responsible business committed to complying with national labour standards and promoting decent work conditions across our business and supply chain.

Combatting modern slavery through embedded human rights due diligence was given priority in addressing the potential slavery, human trafficking, and child labour impacts during F23.



★ ACTION 1

ESG Committee Established

A new structure required to drive the ESG agenda

In F23, our ESG Committee was established with broad-based participation across all business units. The committee's purpose is to advance our environmental, social, and governance goals, align our business practices with sustainability objectives, and ensure responsible allocation of resources.

As part of our commitment to maintaining ESG momentum, we reviewed the committee's effectiveness, leading us to plan for a more focused membership in F24. Proposed membership includes key Executive Leadership Team members such as CEO, CFO, COO, Head of HR, as well as Group ESG Manager and Group Engineering Manager. The committee will continue to drive the nationwide efforts to combat modern slavery through embedded human rights due diligence.

Human Rights Impact

- ✓ Strengthened ESG delivery across the Group
- ✓ Modern slavery risk mitigation now centre-led and aligned to UN Guiding Principles

★ ACTION 2

Policy Committee Established

Lite n' Easy's Policy Committee was formed in F23. A dedicated team with the specific objective of leading the development, management, and communication of our Group's corporate policies. This committee assumes a crucial role in shaping the framework of our policies, ensuring their effective implementation, and facilitating transparent communication with all stakeholders during the development process.

By prioritising policy development, we show our commitment to fostering a positive and respectful workplace, promoting safety and inclusion, and ensuring that our actions align with our values.

We want to be great people to work for, great people to work with, and great people to deal with. The work of the Committee helps us realise this vision.

Human Rights Impact

- ✓ Strengthened governance framework across the Group
- ✓ Centre led policy making as recommended by the UNGPs



ACTION 3

Company Policy Inventory

Protecting human rights through new policy delivery

Through our Policy Committee, we have strengthened our corporate governance by introducing new and comprehensive policies. In F23, we developed and implemented policies that are applicable to all Lite n' Easy team members nationwide. These policies are crucial in shaping our organisational culture and values, and they demonstrate our commitment to being an outstanding employer, collaborator, and business partner.

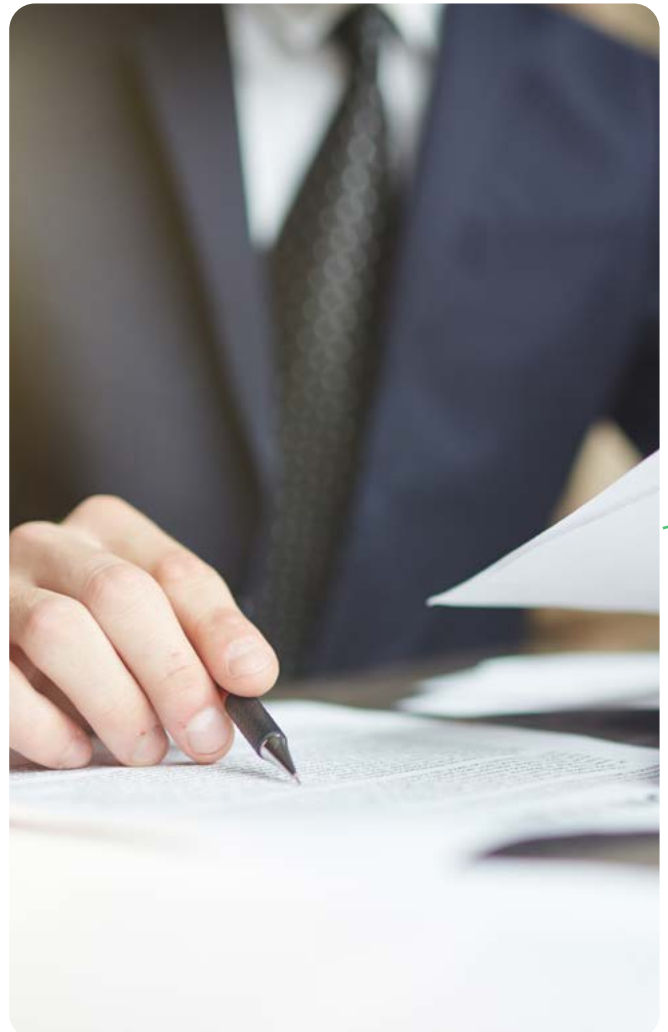
New Group policies and standards that support and protect the rights of our workers have been developed during this reporting period:

- 1. Modern Slavery:** Aims to mitigate the risk of modern slavery in all its forms within our organisation and supply chain.
- 2. Employee Assistance Program:** We have introduced this program to provide support and resources to our employees, ensuring their wellbeing and mental health.
- 3. Grievance:** Outlines the procedures for addressing and resolving employee grievances in a fair and impartial manner.
- 4. Whistleblower:** Our whistleblower standard encourages employees to report any unethical behaviour or wrongdoing, providing them with protection against retaliation.
- 5. Domestic and Family Violence:** Addresses the issue of domestic and family violence, providing support and resources to employees who may be affected.
- 6. Diversity and Inclusion:** We are implementing this standard to foster a diverse and inclusive workplace, promoting equal opportunities and respect for all individuals.
- 7. Anti-Bribery, Corruption and Conflicts:** Sets out our zero-tolerance approach towards bribery, corruption, and conflicts of interest, ensuring ethical conduct in all our operations.

These policies and standards are applicable across all areas of our business and reflect our expectations for all team members to uphold professional, ethical, and accountable behaviour in all aspects of their work.

Human Rights Impact

- ✓ Group rules, standards, values, culture, and benefits are clearly outlined
- ✓ Knowledge of internal procedures to report suspected modern slavery cases
- ✓ Risk management and compliance with key laws and regulations including the MSA



★ ACTION 4

Prioritising Risk in our Supply Chain

Vendor groups were assessed across the Group's supply chain. Our approach was to focus on Tier 1 (direct) suppliers in industries with global supply chains or operations in known geographical hot spots for slavery, trafficking, and child labour. We identified the following priority groups:

- 1. Agency labour:** domestic and international labour providers.
- 2. Fresh produce:** domestic suppliers of fruit and vegetables.
- 3. Country of origin:** Australian-based Tier 1's supplying imported products including:
 - Fresh produce
 - Ingredients
 - Packaging
 - Personal protective equipment (PPE)
 - Electronics
 - Plant & equipment
 - Cleaning products
- 4. Meat processing:** domestic suppliers of meat products and render services.

Human Rights Impact

- ✓ Risk areas defined for progressive rollout of supplier due diligence

★ ACTION 5

Ethical Sourcing Survey Launched

The Slavery & Trafficking Risk Template (STRT) is an open-source survey created by the Social Responsibility Alliance (SRA) which we adopted in F23. It serves as a tool for collecting and sharing data related to slavery and human trafficking risks and compliance within supply chains. By utilising the STRT, we are able to gain insights into our suppliers' operations and identify their strengths and weaknesses in addressing modern slavery risks. Our intention is to work together with our partners to enhance and strengthen areas of risk that may be identified.

STRT roll-out progress in F23:

- Adoption of the STRT as the Group's primary data collection tool for medium to high-risk vendors.
- Commenced an STRT campaign to priority vendor categories, including:
 - Country-of-Origin — Tier 1 suppliers of imported goods.
- Top suppliers (based on expenditure and/or geographical supply chain risk) within relevant categories were identified and invited to complete and return the STRT for assessment.
- Implementation is progressing as we work through Lite n' Easy's priority vendor categories.

Proactive risk identification within the supply chain is a priority for continuous improvement. Additional vendor categories will be added to the STRT due diligence process over the coming years.

Human Rights Impact

- ✓ Framework adopted to guide detailed risk assessment of suppliers
- ✓ Steps to validate the integrity and quality of our supply chains

★ ACTION 6

Integration with Approved Supplier Program

As part of our Approved Supplier Program, we have now integrated ethical supply questions. This entails requesting new suppliers to provide copies of their modern slavery statements and company policies on ethical sourcing and/or human rights commitments. This addition ensures that we collect key information about our suppliers' ethical practices and allows us to make informed risk assessments from the outset of our relationship.

Human Rights Impact

- ✓ Integrated data collection to support supplier due diligence activities



★ ACTION 7

Training - Modern Slavery Online Compliance Course

More than 75 team members comprising executive, managers and supervisors across all departments completed online modern slavery training in the reporting period. The course is offered through our subscription to Safetrac's online training system and covers:

- What is modern slavery?
- What can modern slavery entail?
- What is supply chain transparency?
- Legislation around the world
- Australia's modern slavery legislation

On completing the course, our staff have a general understanding of:

- The 8 types of modern slavery as defined under the MSA;
- The impact of slavery practices to our business and customers; as well as
- The compliance and reporting obligations under the legislation.

Modern slavery training will continue to be rolled out to Lite n' Easy team members with the requirement to refresh on a regular basis.

Human Rights Impact

- ✓ Workforce awareness of risk factors and compliance obligations
- ✓ Knowledge of internal procedures to report potential suspected cases

★ ACTION 8

Grievance and Whistleblower Mechanisms — recognised need by Policy Committee

In F23 our Policy Committee acknowledged the importance of incorporating grievance and whistleblower mechanisms into our Grievance Standard and Whistleblower Standard. As a result, we have initiated the process of making these facilities available to our staff in F24.

Human Rights Impact

- ✓ Establish confidential avenues for staff to raise concerns
- ✓ Plan to provide support and assistance to team members

★ ACTION 9

Appointment of an ESG Resource

In F23, we appointed an ESG manager across the Group. This decision was acknowledged by our Advisory Board, who recognised the importance of incorporating ESG factors into our sourcing and purchasing practices. Under Lite n' Easy's ESG strategy a key focus of this role is to implement internal practices focused on addressing our exposure to human rights issues such as modern slavery. The ESG manager will aim to build internal awareness and modern slavery due diligence capability, ensuring that we are actively working towards addressing any human rights concerns.

Human Rights Impact

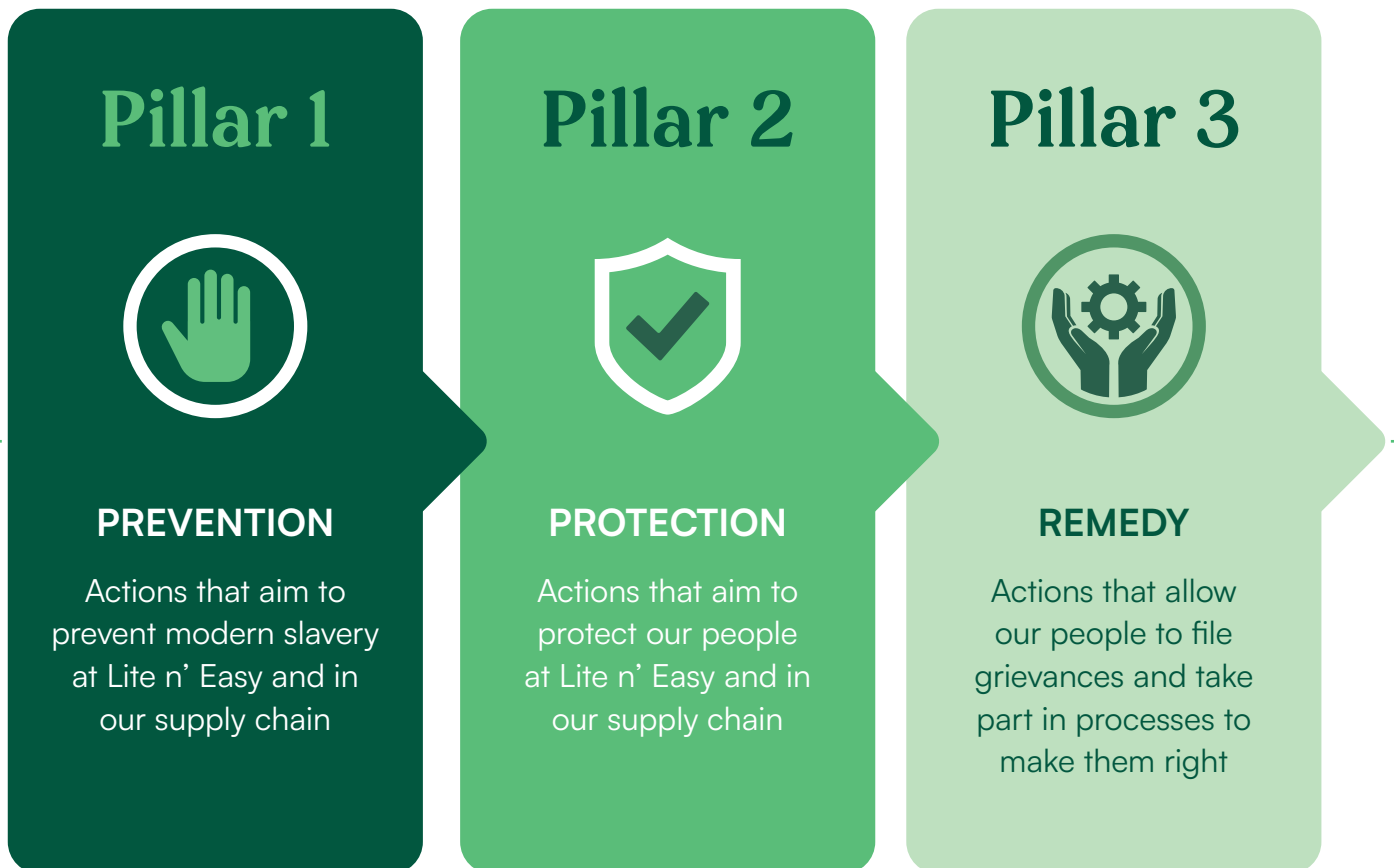
- ✓ Appointed resource dedicated to leading modern slavery program of work

06.

Assessing The Effectiveness of Actions

Lite n' Easy has set practical metrics to assess the progress and effectiveness of our ethical sourcing program. We acknowledge that our success will be dependent on how we measure the implementation of our planned program of work and our ability to refine our approach, as necessary.

The effectiveness of our F23 actions will be assessed across three broad pillars which are adapted from the United Nations Guiding Principles on Business and Human Rights (UNGPs):



Effectiveness Indicators

F23 Actions		Metrics
PILLAR 1	ESG Committee Established	<ul style="list-style-type: none"> • Number of meetings. • Planned versus actual modern slavery activities delivered.
PILLAR 1	Policy Committee Established	<ul style="list-style-type: none"> • Policies maintained according to changes in relevant laws and regulations.
PILLAR 1	Policy Inventory	<ul style="list-style-type: none"> • Modern Slavery Policy reviewed in cycle. • Internal communication of new or updated policies.
PILLAR 1	Prioritising Risk in our Supply Chain	<ul style="list-style-type: none"> • Identification of priority supply categories and suppliers.
PILLAR 2	Ethical Sourcing Survey Launched	<ul style="list-style-type: none"> • Vendor response rate. • Number of remediation action plans and/or RFI's enacted. • Number of human rights breaches identified.
PILLAR 2	Integration with Approved Supplier Program	<ul style="list-style-type: none"> • Vendor response rate. • Average risk-rating result.
PILLAR 2	Training - Modern Slavery Online Compliance Course	<ul style="list-style-type: none"> • Number of staff who completed the e-learning course.
PILLAR 3	Grievance and Whistleblower Mechanisms	<ul style="list-style-type: none"> • Number of human rights related incidents reported. • Number of human rights related incidents remediated. • Broad staff awareness of, and accessibility to, these support mechanisms.

Performance against these metrics will be reported on a regular basis to Lite n' Easy's ESG Committee. We intend to review and refine our approach periodically to consider any emerging modern slavery risks.

07.

Consultative Process Across Lite n' Easy Group

In F23, Lite n' Easy continued the development and implementation of internal initiatives across our operations that aid in identifying potential risks of modern slavery.

We apply a uniform approach to risk assessment and management across each of the Lite n' Easy entities covered by this statement. Lite n' Easy is overseen and managed by a common leadership team, with all policies, systems and processes designed to be consistently applied across the Group.

As a centrally managed group, the consultation process among the Lite n' Easy entities occurs through business-as-usual practices and through our ESG Committee. As such, key personnel responsible for all reporting entities were consulted in preparing this joint statement. Furthermore, the analysis of modern slavery risks in this statement applies to all reporting entities covered by this statement.



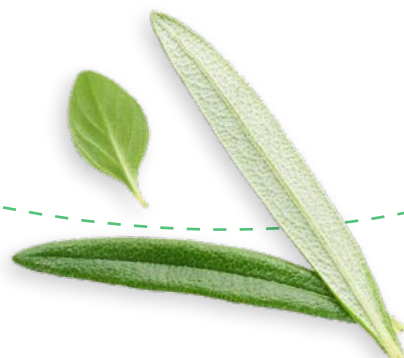
08.

Additional Information

Mandatory reporting criteria of the Modern Slavery Act

This Statement was prepared to meet the mandatory reporting criteria set out under section 16 of the *Modern Slavery Act 2018* (Cth). The table below identifies where each criterion of the Act is disclosed within sections of this Statement.

MSA Reference	MSA Criteria	Reference in this Statement
s16. 1(a)	Identify the reporting entity	Page 05
s16. 1(b)	Describe the reporting entity's structure, operations and supply chains	Page 06
s16. 1(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 09
s16. 1(d)	Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Page 13
s16. 1(e)	Describe how the reporting entity assesses the effectiveness of these actions	Page 19
s16. 1(f)	Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 21
s16. 1(g)	Provide any other relevant information	Page 22
s16. 2(b)	Details of approval by the relevant principal governing body or bodies	Page 05



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happier Australia

Lite n' Easy

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