



Petuna Modern Slavery Statement 2021

This statement is made in accordance with the Modern Slavery Act 2018 (Cth) (the **Act**) by Petuna Aquaculture Pty Ltd, which is the relevant reporting entity, and which is referred to in this statement as **Petuna** or the **Company**. The reporting period covered by this statement is Petuna's financial year ending 30 September 2020.

The Act requires Petuna to lodge a statement for each reporting period which sets out the actions taken by Petuna to assess and address the risks of modern slavery in our business and supply chain functions.

Definition of Modern Slavery

Modern Slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery include:

- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage and
- The worst forms of child labour

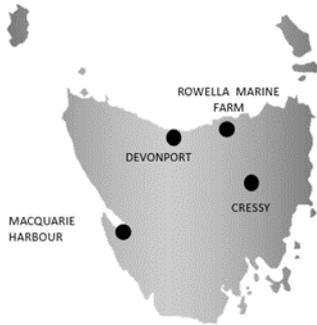
Entities Covered by this Statement

The Petuna group of companies is comprised of three companies: Petuna Aquaculture Pty Ltd (which is the parent company and reporting entity for the purposes of this statement), Petuna Pty Ltd and Van Diemen Aquaculture Pty Ltd. All three companies have the same governance structure; a board of directors and executive senior management team, which comprise the same people for all three companies. This statement applies to all three companies and all references of **Petuna** or the **Company** are references to the three companies.

During the reporting period Petuna Aquaculture Pty Ltd became a wholly-owned subsidiary of Sealord Group Limited, a New Zealand company.

Petuna's Organisational Structure and Operations

Petuna is a leading Australian aquaculture company that grows, harvests, and processes premium salmonids for sale to wholesale and retail markets primarily in the domestic market with some export activity. Petuna currently operates a hatchery in Cressy, two aquaculture marine farm sites (Macquarie Harbour and Rowella) and a production processing plant at Devonport, Tasmania.



Over 200
Employees



Over 7200 Tonnes
of Salmonids
Grown



3.95% of Suppliers
are international
Suppliers.

Petuna's headquarters are in East Devonport, Tasmania and it operates a further office in Launceston, Tasmania. We take pride in being a large employer in the Tasmanian aquaculture industry with around 200 employees state-wide and a further casual workforce of up to 50 during certain times of the year.

We grow premium salmonids, such as Atlantic salmon and ocean trout, and our annual harvest is around 7,200 tonnes. Our hatchery located at Cressy invests significant time, expertise and science developing salmonid families from specially selected brood stock utilising genetic selection principles to produce healthy fish with greater resilience to warming waters that also thrive and grow into quality fish with quality texture, colour, and taste. The growth phase takes place in premium Tasmanian waters at our two aquaculture farms situated in north and west Tasmania, Rowella, and Macquarie Harbour, respectively. The final stage of our operations occurs at our modern processing plant situated at Devonport, ready for distribution to retail and wholesale markets and ultimately to the consumer.

Petuna's Supply Chain

Petuna sources various products for our operations predominately from local suppliers, however also some product, internationally. Products can vary from ingredients and packaging for the processing facility to fish feed, farm nets, plant and equipment and operating machinery for our marine farms.

Categories of services used by Petuna include but are not limited to information technology service providers, distribution logistics, facilities services, and consumables. Most services are sourced locally, primarily Tasmanian with some interstate consultancy services.

Sealord Australia Pty Ltd, a subsidiary of Sealord Group Limited, markets and sells the majority of Petuna's products.

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The Risk of Modern Slavery Practices in Petuna's Operations and Supply Chain

Petuna is committed to producing the highest quality, sustainably and ethically sourced salmonids whilst responsibly maintaining the health and welfare of our people, our fish and the environment in which we operate. Although Petuna's values, policies and practices and the expectations of our people regarding ethical conduct eliminate/mitigate the risk of modern slavery practices in our own workforce, the risk of potential modern slavery practices in the supply chain is always present.

Sourcing specialist plant, aquaculture equipment and product associated with our operations from overseas countries with less developed economies, regulations, and practices, together with indirect entities, Petuna does not have a direct contractual arrangement (i.e. in our suppliers' supply chains), are assessed as having an increased risk of the potential for modern slavery practices. The number of direct global suppliers is under 4% of our total supply chain activity.

Actions Taken by Petuna to Assess and Address Risks

Petuna has formal policies and documents in place that promote ethical conduct and form due diligence against and prohibit modern slavery practices, as well as provide avenues for individuals to report.

Our active relevant policies and Instruments that contribute to preventing violation of Human Rights and modern slavery practices include:

- Sealord Group Employee Code of Conduct
- Employees Working under 18 years of age Policy
- Whistle-Blower Policy
- Business Ethics Policy
- Supplier Ethical Sourcing Code of Conduct
- Grievance Policy and Procedures
- Industrial Instruments – Enterprise Agreements and Individual Contracts that comply with Australian law and regulations

Petuna is registered as a supplier with the Supplier Ethical Data Exchange (SEDEX) and undertakes Supplier Member Ethical Trade Audit (SMETA) four pillar 3rd party compliance audits encompassing labour standards, business ethics, health and safety, and the environment.

Additional 3rd party compliance audit occurs across all our sites in the form of our Best Aquaculture Practices (BAP) accreditation. BAP is the only 3rd party aquaculture certification program that encompasses the entire production chain, including the hatchery, processing plant, farm and feed mill. BAP certification is a due diligence/compliance process that amongst other crucial business areas, covers worker safety and employee relations.

As part of our supply chain process all new suppliers and any renewing suppliers are subject to our due diligence process before Petuna will enter into a contract with them.

Supplementary assessment may be conducted at Petuna's discretion and any reservations around business conduct, compliance, and human rights is reviewed and mitigated in partnership with the relevant supplier representative.

Suppliers that are considered by Petuna to present a modern slavery risk following due diligence will be either rejected or subjected to continuous monitoring. Where appropriate, Petuna will take necessary actions to terminate supplier arrangements or contracts with any suppliers that do not comply with the supplier code of conduct.

Petuna has developed a *Supplier Ethical Code of Conduct* as part of our commitment to integrate ethical and socially responsible business practices into all aspects of our business. As part of that code, Suppliers commit that they currently do, and will continue to, comply with Petuna's ethical sourcing principles and practices. Suppliers acknowledge that Petuna may verify compliance through internal or external assessment mechanisms including but not limited to questionnaires, declarations, request for policies and other documentation validating practice as well as 3rd party audits. The code includes the following areas of ethical conduct: Wages, working hours, harsh and inhumane treatment, discrimination, bullying and harassment, freely chosen employment, child labour, safe working conditions, freedom of association, entitlement to work and recognised immigration.

Measuring Effectiveness of Petuna's Actions

After receiving our Supplier Compliance Form and Supplier Questionnaire Petuna may undertake assurance checks from time to time as considered necessary by Petuna dependant on assessed risk.

Additionally, we continue to complete our own annual internal review process on Modern Slavery risk of current business processes.

We also engage with any required compliance reporting requested by our customers and third parties such as participating in:

- Sedex (Supplier Ethical Data Exchange) and related SMETA audits
- Reporting for sustaining BAP (Best Aquaculture practice) accreditation.

We will continue to explore further mechanisms to assess the effectiveness of actions we undertake to address modern slavery in our operations and supply chain.



Consultation with Entities

As all Petuna companies share the same board and executive/senior management, consultation occurs automatically, however there is also ongoing consultation with key site managers and other company personnel that have procurement involvement. Petuna is wholly owned by and engages with Sealord Group Ltd of New Zealand on broader human rights issues and international standards that impact our Business.

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Future Commitments

Over the next year our key focus areas to improve our approach to Modern Slavery will be:

- Further develop our Procurement Procedures Management
- Broaden our key suppliers' commitment to Modern Slavery prevention

Petuna is committed to ensuring modern slavery practices are not present in our direct and indirect operations and supply chains.

Approval and Authorisation

This statement was approved by the Board of Directors of Petuna Aquaculture Pty. Ltd. on March 22th, 2021.



Steve Yung
Chair

Petuna Aquaculture Pty Ltd