



Modern Slavery Statement

2025





Acknowledgement of Country

SunRice Group acknowledges the Traditional Owners and Custodians of the lands on which we live, work and operate. We pay our respects to Elders past and present and acknowledge their continuing connection to land, waters and community.

Contents

ACKNOWLEDGEMENT OF COUNTRY	1
ABOUT THIS STATEMENT	2
CHAIR AND GROUP CEO AND MANAGING DIRECTOR MESSAGE	3
INTRODUCTION	4
OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN	6
IDENTIFYING AND UNDERSTANDING OUR MODERN SLAVERY RISKS	11
ASSESSING AND ADDRESSING OUR MODERN SLAVERY RISKS	15
GRIEVANCE MECHANISMS AND REMEDIATION	25
ASSESSING THE EFFECTIVENESS OF OUR APPROACH	27
CONSULTATION PROCESS	28
REGULATORY DISCLOSURE MATRIX	29
APPENDIX 1: OUR BRANDS	30
APPENDIX 2: OUR OWNED AND CONTROLLED ENTITIES	31



ABOUT THIS STATEMENT

About this Statement

This Modern Slavery Statement (Statement) is made in accordance with the *Australian Modern Slavery Act 2018 (Cth)* (Act) and also meets the disclosure requirements of the *United Kingdom (UK) Modern Slavery Act (2015)*. This Statement also informs our disclosure against the *California Transparency in Supply Chain Act (2010)*. This is a joint Statement made under section 14 of the Act, for Ricegrowers Limited (SunRice) ABN 55 007 481 156 and Riviana Foods Pty Ltd (Riviana Foods) ABN 97 061 388 092, which we have determined are reporting entities under the Act. This Statement describes the actions taken by the reporting entities, and their owned or controlled entities, to assess and address modern slavery risks in their operations and supply chains for the reporting period 1 May 2024 to 30 April 2025, which is our financial year (FY25). It is our sixth Statement.

Unless expressly stated otherwise, references in this Statement to “SunRice Group” and “Group” refer to Ricegrowers Limited, Riviana Foods Pty Limited and the other owned or controlled entities of Ricegrowers Limited. Their operations and supply chains form part of the operations and supply chains of the reporting entities.¹ All policies, processes and activities discussed in this Statement are applicable to SunRice Group, unless otherwise specified. During the reporting period SunRice Group acquired Simply Delish Pty Ltd (Simply Delish) and SavourLife Pty Ltd (SavourLife) and its associated company SavourLife IP Pty Ltd. Further information on these entities is included on page 12. A full list of our owned or controlled entities is provided in Appendix 2.

The Statement was approved on 2 September 2025 by the SunRice Board and signed by Paul Serra, SunRice Group CEO and Managing Director and Laurie Arthur, Chair of the Board, on behalf of both reporting entities.

1. See SunRice Group 2025 Annual Report. Available [here](#), page 9 for a description of our operating segments and businesses and page 130 for a full list of Ricegrowers Limited’s owned or controlled entities that comprise the SunRice Group.



SunRice Group Speak Up

SunRice Group is committed to ensuring our people, community members impacted by our activities, our customers and those in our supply chain have access to an effective grievance mechanism. If you have concerns about modern slavery issues in our operations or supply chain, it’s important to speak up. You can make a report via the channels set out below.

All reports will be treated confidentially. If you would like to make an anonymous report, you can use the Speak Up hotline.

To report a concern to SunRice Group directly:

Email: ABCReporting@sunrice.com.au
Post: PO Box Q166 QVB
 Post Shop, NSW 1230 Australia
Call: +61 2 9268 2074 (Australia)

To report a concern to SunRice Group’s independent Speak Up hotline (toll free):

Online: sunrice.ethicspoint.com
Call: 1800 953 947 (Australia)
 800 852 3976 (Singapore)
 833 581 0346 (USA)
 000 861 271 (PNG)

If calling from Vietnam: *Step 1:* Dial the direct access number for your location: 1 201 0288 or 1 228 0288. *Step 2:* At the English prompt dial: 833 581 0346.



Scan QR code
to make a report



Chair and Group CEO and Managing Director message



We are pleased to present SunRice Group's 2025 Modern Slavery Statement. This year marks 75 years since the founding of the SunRice Group – a significant milestone that speaks to the strength of our business, the commitment of our people, and our deep connection to the communities and markets in which we operate.

From our origins in regional Australia, to becoming a diversified global food business, we have always sought to grow with purpose. As a business involved in the sourcing, production and distribution of food across complex and dynamic supply chains, we recognise our responsibility to respect human rights and uphold ethical business practices – not only within our own operations but throughout the broader network of suppliers and partners we work with around the world.

Modern slavery is a global issue, and we are committed to identifying, preventing and responding to modern slavery risks by focusing on transparency and undertaking meaningful action. As our operations and supply chain evolve, so too will our approach.

This statement outlines the steps taken in FY25 to strengthen our approach to modern slavery risk management. These steps included enhancing our due diligence practices, updating our Supplier Sustainability Code, and completing social and ethical audits at sites in Australia and the United States (US). We have also recently introduced a new Group Sustainability Policy and published our Human Rights Statement, helping to embed these principles into our governance and decision-making frameworks.

Our approach to human rights aligns with our 2030 Strategy, which has sustainable outcomes as a strategic enabler to our future growth. As we work to execute our 2030 Strategy and deliver value for our growers, customers and shareholders, we remain committed to protecting the dignity and wellbeing of people across our value chain.

Looking ahead, we will continue to work within our own organisation and closely with our suppliers to embed respect for human rights and support efforts to mitigate the risk of modern slavery in all its forms.

Laurie Arthur
Chair

Paul Serra
Group CEO and Managing Director

2 September 2025



Introduction

SunRice Group is a global food business and one of Australia’s leading branded food exporters. Our Vision is to “grow, source and craft, with enduring care for our people, communities and environment, quality food that brings authentic flavour and convenience... wherever our travels take us”. We are committed to acting on our responsibility to respect the human rights of people in our operations and supply chain in line with the *UN Guiding Principles on Business and Human Rights* (UNGPs).

Modern slavery is an umbrella term referring to situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, deception and/or abuse of power.² Given its complexity and evolving nature, we actively monitor our modern slavery risks so that our approach remains responsive to emerging risks areas, growing stakeholder expectations and changes to local and global legislation.

Our approach to sustainability

Our new Sustainability Strategy, informed by the Group’s materiality assessment, was approved by the Board in FY25. The Strategy supports the Group’s 2030 Strategy, focusing on the areas where we seek to drive the most positive impact across the pillars of Thriving People, Thriving Planet, Thriving Communities and Inspiring Products.³

The pillars most relevant to addressing modern slavery risk are on the right.



Thriving People

Respecting Human Rights:

We understand and act on our responsibility to respect the human rights of people in our operations and supply chain.



Inspiring Products

Resilient and Traceable Supply Chain:

Partner with our suppliers and co-manufacturers to improve traceability and enhance our approach to ethical sourcing.

Integration of these pillars into the Group’s ways of working will be supported by a refreshed governance structure in FY26.

2. Walk Free. What is Modern Slavery? Available [here](#).

3. SunRice Group 2025 Annual Report. Available [here](#), page 18.



Our goals and actions

We set and started reporting on long-term goals in FY20 to guide our approach to modern slavery risk management. To support alignment with our new Sustainability Strategy, we will review these goals in FY26. Our current goals:

- Embed robust governance systems to assess the impact of SunRice Group’s operations on human rights including modern slavery;
- Implement our social and ethical audit plan at SunRice Group sites;
- Minimise the risk of labour rights abuses in our operations and supply chain;
- Build internal capability to identify and remediate issues as they arise; and
- Foster open and trusted supplier relationships to identify and remediate labour rights issues across our supply chain.

Our commitment to continuous improvement

SunRice Group is committed to continuously improving our approach to risk management. In FY25 we engaged Monash University to benchmark our FY24 *Modern Slavery Statement* against Australian Securities Exchange (ASX) 100 and ASX300 companies, and a group of our industry peers and major customers, to help us identify opportunities to strengthen our approach and disclosures (see page 27). We also attended various industry and government forums which allowed us to monitor disclosure and risk management practices.

Key actions during FY25

During FY25, we continued to implement and further develop key elements of our modern slavery risk management approach. Key actions included:

- Conducted audits (using Sedex Members Ethical Trade Audits (SMETA)) on our Deniliquin Mill, CopRice Leeton facility, SunFoods Mill in California and our SunFoods Hawaii operational site. We also continued to follow-up, monitor and close out previous SMETA audit findings.
- Continued to strengthen our approach to governance by reviewing and updating various policies and guidelines including our Supplier Sustainability Code (see page 17) and Labour Rights Standard Policy.
- Developed a Group Sustainability Policy and Human Rights Statement, which together, set out our commitment and approach to respecting human rights.
- Continued embedding sustainability considerations, including modern slavery, into our new product development (NPD) processes and procurement tenders.
- Developed and delivered training to our Board of Directors and members of the Corporate Management Team (CMT) on human rights with the support of a human rights expert.⁴
- Continued to roll out training to our employees, including our forced labour e-learning module, titled *Recognising the risks of Modern Slavery*, which our Australian Growers now have access to, and Ethical Trading Initiative (ETI) Base Code training.

4. The training was developed in FY25 and delivered in early FY26.

Planned actions for FY26

In FY26, we aim to:

- Conduct audits of four of our sites: CopRice Wangaratta, Deniliquin Australian Grain Storage (AGS) facility, Leeton Mill and our Leeton Specialty Rice Food Group (SRFG).
- Conduct a pre-harvest risk and post-harvest review of our facilities specifically relating to working hours.
- Develop guidance to support the implementation of our updated Supplier Sustainability Code, including communications materials to build capability on the Code.
- Enhance our supplier due diligence processes to further embed modern slavery risk management of our priority suppliers with specific focus on our co-manufacturers.
- Explore opportunities to build capability across the Group in responding to issues relating to modern slavery in our supply chain.
- Strengthen internal awareness of human rights risks as they relate to our operations and supply chain.





OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our structure, operations and supply chain

Our structure and operations

SunRice Group is a global food business with a deep Australian heritage, and one of Australia's leading branded food exporters.

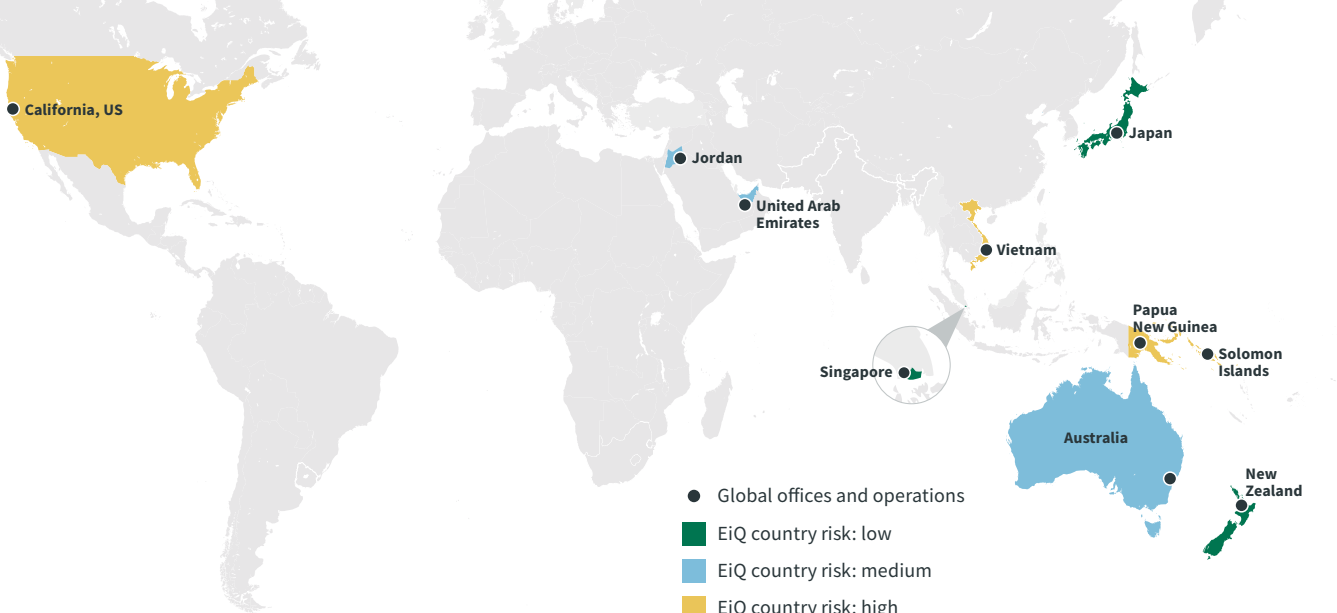
Ricegrowers Limited is a reporting entity under the Act. Our business was founded by rice growers in the Riverina region of NSW in 1950 and the company is incorporated in Australia. Today, SunRice is listed on the ASX (Ricegrowers Limited: SGLLV) and the Group has operations in 10 countries⁵ and a presence in close to 50 markets. The Group's registered office is in Leeton, NSW, Australia.

Riviana Foods Pty Limited is also a reporting entity under the Act. Riviana Foods is a brand-led gourmet food business and is a wholly owned subsidiary of SunRice Group which is incorporated in Australia.

A full list of our owned or controlled subsidiaries that are not reporting entities under the Act, but whose operations and supply chain form part of the operations and supply chain of the reporting entities, is provided in Appendix 2.

SunRice Group supports the interests of both A and B Class Shareholders. A Class Shareholders are growers who meet the rice production criteria in our Constitution, are paid for their paddy through our Rice Pool Business, and have control of the company. The Group's B Class Shareholders have the right to receive any dividends generated by our Profit Businesses, and other distributions made by SunRice Group from time to time. The two shareholder classes, while separate, complement each other, strengthening the alignment between our investors and growers.

SunRice Group's operations are supported by various functions including Research and Development, People and Culture (P&C), Health, Wellbeing, Safety and Environment (HWSE), Marketing, Sales, Quality, Procurement, IT, Sustainability, Risk, Treasury, Legal and Finance.



- Global offices and operations
- EiQ country risk: low
- EiQ country risk: medium
- EiQ country risk: high
- EiQ country risk: extreme

OUR OBJECTIVE IS TO OPTIMISE RETURNS FOR BOTH CLASSES OF SHAREHOLDERS

A

A Class Shareholders
GROWERS

Australian Rice Pool Business

Receival, milling & selling of Riverina Rice

Revenue – Expenses = Paddy Price

Payments for paddy rice to A Class Shareholders and growers

B

B Class Shareholders
INVESTORS

Profit Businesses

International Rice, Rice Food, Riviana Foods, CopRice & Corporate

Revenue – Expenses = Profit

B Class Shareholders entitled to dividends (when declared)

Shared costs
Asset financing charge
Brand use charges

SunRice Group global locations and EiQ country risk rating⁶

EiQ is a third-party, integrated supply chain ESG risk management and due diligence tool. EiQ calculates country risk using a range of tools and indices including results from social and ethical audits, the Human Development Index, the Global Slavery Index and other calculations associated with issues such as child labour, forced labour, working hours and wages. Environmental indices are also considered in the rating.

Our Sustainability team uses the data to gain insights into key risk areas, including modern slavery risks, and draws on the Sentinel tool built into EiQ to scan for risks and insights associated with some of our suppliers. These insights also inform our assessment of country risk, although they do not take into account any mitigating measures that the Group has in place.

5. Australia, Jordan, UAE, Japan, Vietnam, Singapore, the US, NZ, Solomon Islands and PNG.
 6. In our FY24 Statement we reported on EiQ's 2023 country risk data. This Statement uses EiQ's 2025 country risk data. From 2023 to 2025, Australia's rating shifted from low to medium and Japan's from medium to low. According to EiQ, the heightened risk in Australia is largely driven by an increase in the number of audits conducted in Australia and the resulting data these audits have generated. In previous Statements, we used regional risk ratings for California and Hawaii, however, in this year's Statement we have included the US country risk rating to align with our approach to other jurisdictions.



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our businesses, brands and products

AUSTRALIAN RICE POOL BUSINESS



Rice Pool

Our Australian Rice Pool Business is known for its supply of branded Australian rice. Rice growers across the Murrumbidgee and Murray valley regions of Australia (“the Riverina”) grow premium rice featured in SunRice Group’s portfolio. Supplying retail, food service, food ingredients, and business customers in Australia, New Zealand, the Pacific, Asia, the Middle East, UK and Europe, our products include Medium and Long Grain Rice, as well as specialty varieties, such as Low GI White and Brown Rice and fragrant Jasmine Rice. The Australian Rice Pool Business also participates in tender markets, supplying rice into Japan, Korea and Taiwan.

PROFIT SEGMENTS



International Rice

Our International Rice segment sources rice from 10 countries, including Australia, to sell in close to 50 markets worldwide. This segment includes our extensive global supply chain and partnerships with international rice growers and suppliers in the US, Vietnam, Cambodia, Thailand, China, India, Taiwan, Pakistan and Italy. It also includes internationally sourced rice sold in Australia and the sale of Australian rice into certain international markets.



Rice Food

Our Rice Food segment delivers snacks and rice-based products in Australia, New Zealand, the US and the Asia Pacific region. Products include a range of Microwave Rice and a snacking range including Protein Chips, Mini Bites, Brown Rice Chips, Rice Cakes and Rice Cracker Chips. We also supply rice flour and ingredients to food manufacturers and ingredient customers in Australia, New Zealand and Japan for products including breakfast cereals, rice crackers and gluten-free baked goods.



Riviana Foods

Riviana Foods is our brand-led gourmet food business. Riviana Foods has a portfolio of more than 400 products across multiple food categories for retail and food service customers. Food categories include bakery; chilled desserts; olives, sundried tomatoes and pickled cucumbers; condiments and sauces; soups and ready meals, fruit (canned); and vegetables (canned, frozen and pouch). In FY25, we added Simply Delish to our portfolio, to support our expansion into chilled products.



CopRice

CopRice is our animal nutrition business that has a manufacturing footprint across Australia and New Zealand. CopRice’s portfolio includes branded pet food for dogs (working dogs and pets) and cats; an all-natural cat litter using upcycled rice husks; branded equine nutrition; and feed for the livestock sectors. In FY25, we added SavourLife to our portfolio, expanding our presence in the premium companion animal food market.



Corporate

Our Corporate segment captures the cost of holding and financing assets that are used by our Australian Rice Pool Business and our Profit Segments. It also includes cross segment charges for the use of SunRice Group brands, and access to our milling and storage assets.

OUR BRANDS AT A GLANCE

Over **1500** products across
40+ brands
Sell in close to **50** global markets

(our major brands are listed in Appendix 1)



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN



From left: Helen Zhang, Legal Counsel; Katherine Richards, Group Head of Reward and People Services, People and Culture; Ignacio Garcia, Reward Analyst, People and Culture.



Malson Nangai, Sales Representative, Trukai.



Chris Hotham, Site Leader, CopRice Leeton.

Amos Gaius, Trukai Site 1 Safety Manager and Sonia Mondl, Personal Assistant.



Tegan Handby, Operator, Leeton SRFG.



Ricegrowers Vietnam Team, Vietnam.



Kristine Samson, Tax Manager, Group Finance.

Our workforce

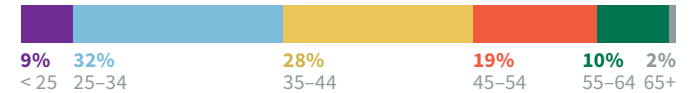
We employ approximately 2,400 people globally (95% permanent full-time; 5% permanent part-time, temporary fixed term or casual). We also engage temporary or seasonal workers including through labour hire providers in Australia and the US. The number of these workers fluctuates during the year, particularly in the US. In FY25, our Australian business engaged individuals through a labour hire provider to support with the rice harvest season. These workers comprised 5% of our total global workforce. Approximately 51% of our Australian and New Zealand employees are covered by an enterprise bargaining agreement and approximately 71% of our Australian employees are covered by an award.

The diagrams below represent the global employee base at 30 April 2025.

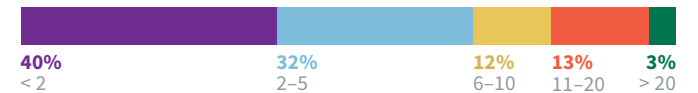
Employees



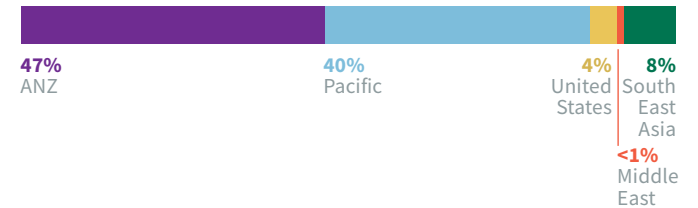
Age (years)



Length of service (years)



Location





OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN



Chiang Mai region, Thailand.

Our supply chain

We take a multi-origin, multi-market approach to securing a reliable and adaptive global supply chain. We spent approximately A\$1.5b during the reporting period with around 5,000 suppliers (see the table to the right which captures our top countries by spend), with rice comprising our largest procurement category in terms of volume and spend (captured under “Raw Materials” in the pie chart to the right). In FY25, we sourced over 800,000 paddy tonnes of rice from 10 countries,⁷ including Australia, to meet global demand. Other key products and services procured included raw materials (e.g. agricultural products and food ingredients), packaging and manufacturing, professional services and logistics services. We have short and long-term contracts with suppliers depending on the type and nature of the product or service.

Procurement at SunRice Group is currently managed by segment-specific procurement teams (e.g. Riviana Foods, CopRice) and the Group Procurement function. Group Procurement is responsible for the management of strategic categories, spend over a specific threshold, and categories that are considered critical and/or high-risk across a range of areas including modern slavery.

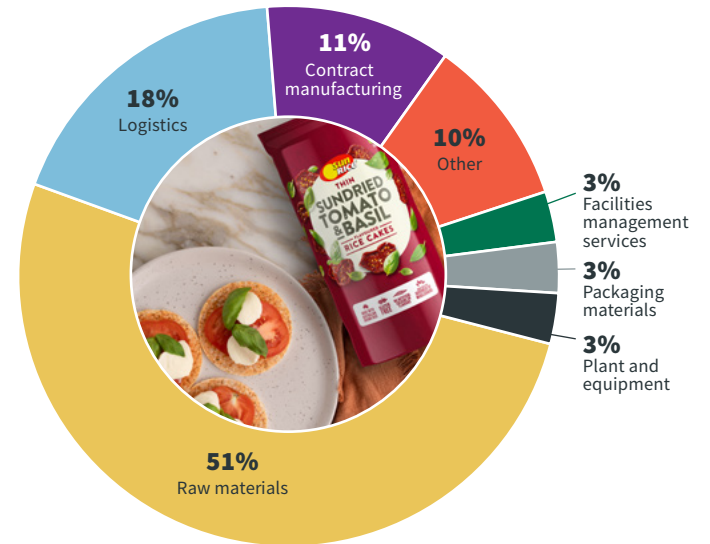
TOP 10 COUNTRIES BY SPEND⁸

		NUMBER OF SUPPLIERS	EIQ COUNTRY RISK RATING
AUSTRALIA	52%	3475	MEDIUM
US	12%	367	HIGH
VIETNAM	9%	268	HIGH
THAILAND	7%	14	HIGH
CHINA	4%	18	HIGH
PNG	3%	637	HIGH
ITALY	2%	19	MEDIUM
FRANCE	1%	10	LOW
TAIWAN	1%	4	MEDIUM
INDIA	1%	12	HIGH

- The SunRice Group’s 10 rice sourcing countries in FY25 were Australia, Cambodia, China, India, Italy, Pakistan, Taiwan, Thailand, the US and Vietnam.
- These countries indicate the location of our direct suppliers. We acknowledge that goods and services supplied by our direct suppliers may be (or have components that may be) manufactured or provided in other countries. The data in this table does not reflect our total spend, just the top 10 countries.
- “Raw Materials” includes rice, wheat, barley, animal fats and oils, seasoning, flavours, minerals, nutrition, supplements, starch; “Contract Manufacturing” includes finished goods such as ready-to-eat rice and jarred fruit and vegetables; “Plant and Equipment” also includes maintenance, repairs and operations; “Other” includes ICT, professional services, travel, entertainment and fleet management.

TOP SPEND CATEGORIES⁹

	TOP 3 COUNTRIES BY SPEND
RAW MATERIALS	Australia, US, Vietnam
LOGISTICS	Australia, PNG, US
CONTRACT MANUFACTURING	Thailand, Italy, France
OTHER	Australia, US, PNG
FACILITIES MANAGEMENT SERVICES	Australia, PNG, US
PACKAGING MATERIALS	Australia, China, US
PLANT AND EQUIPMENT	Australia, US, PNG





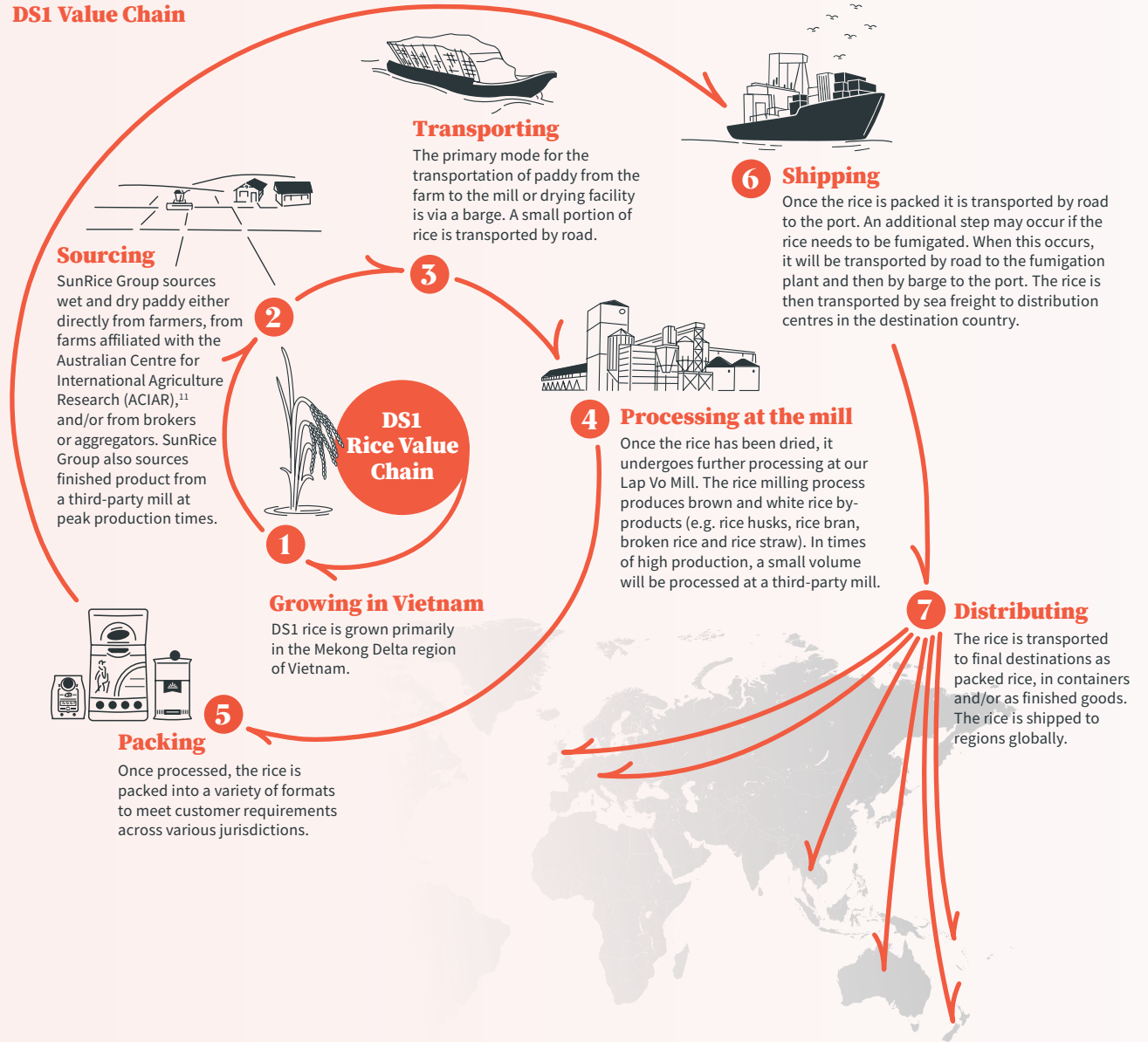
Rice value chain

We work to continuously enhance our understanding of our supply chain, including identifying areas where the risk of modern slavery may be present.

Our international rice value chain differs from our Australian rice value chain¹⁰ and varies depending on where the rice is sourced from and by whom. For example, rice may be sourced directly from farms as wet or dry paddy or from brokers, aggregators, drying facilities or rice mills at various stages of rice processing. The way the rice is distributed and transported also varies from country to country, for example rice is transported from the farm to the mill on barges in Vietnam, and from farm to storage facilities in Australia by road. While we have long-term relationships with several suppliers, our supply chain may vary from year to year depending on various factors including natural disasters and climate conditions (e.g. drought or floods); trade policies (e.g. tariffs, export bans); macroeconomic trends (e.g. inflation); increased commodity, input and supply chain costs; and/or geopolitical factors.

The diagram to the right provides a high-level overview of some of the key stages in the growing, production, transportation and distribution of one of our rice varieties, DS1. DS1 rice, also known as Japonica rice, is grown in Vietnam, particularly in the Mekong Delta region and accounts for 7.5% of our total rice supply.

DS1 Value Chain



10. Our FY24 Modern Slavery Statement included a high-level diagram of the Australian rice value chain (see page 13 of SunRice Group's 2024 Modern Slavery Statement).

11. To learn more about our partnership with ACIAR, see SunRice Group 2025 Annual Report. Available [here](#), page 42.



Identifying and understanding our modern slavery risks

Understanding how we could be involved in modern slavery risks

SunRice Group is committed to meeting its responsibility to respect human rights in accordance with the UNGPs. In line with the UNGPs, a company may cause, contribute, or be directly linked to modern slavery in its operations and supply chain. This is known as the continuum of involvement and the Australian Government’s guidance on the Act encourages reporting entities to draw on this continuum in identifying, addressing and reporting on modern slavery risks.¹² Under the continuum, a company’s level of involvement in a human rights harm (including related to modern slavery) informs how the company is expected to respond to and remediate the harm.

The table to the right provides an overview of the types of involvement and hypothetical examples to help demonstrate how SunRice Group may be potentially involved in modern slavery.

We have identified that it is more likely that SunRice Group could be directly linked to modern slavery through our suppliers or other business relationships, rather than causing or contributing to it.¹³ However, there are potentially higher risks associated with a number of locations where we operate and source agricultural-based products from. Geopolitical developments (e.g. conflict) and environmental issues (e.g. natural disasters) as well as our business’ expansion into new geographies may affect our exposure to modern slavery risks from time to time, including our potential level of involvement. As such, there is a risk we may cause or contribute to modern slavery if we do not have adequate controls, or if we ignore credible allegations about a business partner, such as a supplier.

12. Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. Available [here](#).
13. Under the UNGPs, a company’s “business relationships” are understood to include relationships with business partners, entities in its value chain, and any other non-State or State entity directly linked to its business operations, products or services. Guiding Principles on Business and Human Rights: Implementing the United Nations Protect, Respect and Remedy Framework. Available [here](#).

Type of involvement

Cause

A business may cause modern slavery if its own actions or omissions directly result in modern slavery occurring (e.g. a business subjects its workers to serious exploitation such as forced or bonded labour).

Hypothetical examples of how a company in the food and agriculture sectors may be involved in modern slavery or worker exploitation

A food processing company directly recruits workers from a neighbouring country to work in its factory. As part of the work contract, the processing company requires the workers to pay a recruitment fee to cover the company’s administrative costs associated with recruiting migrant workers. As the workers cannot pay this fee upfront, the company deducts the fees from the workers’ salary and charges interest to do so. The debt grows each month and becomes so significant that it will take years to pay off. As security for the debt, the company also holds the passports and work permits of the workers until the debt is repaid.

Contribute

A business may contribute to modern slavery if its actions or omissions facilitate or incentivise modern slavery occurring to the extent that modern slavery would have been unlikely to occur without these actions or omissions.

A business could also potentially contribute to modern slavery if it does not undertake appropriate due diligence in relation to its risk areas (e.g. a business’ procurement practices).

A food company places unrealistic expectations on an ingredient supplier by negotiating a very low price and deadline for a shipment of rice. The only way the order can be met is by the supplier engaging in exploitative practices. As a result, the supplier requires its workers to work excessive, unpaid overtime. The food company is aware of this risk but proceeds with the negotiated terms regardless.

Directly linked

A business’ operations, products or services may be directly linked to modern slavery through the activities of a third party, such as a supplier. A business may be directly linked, even when it has a modern slavery clause in the supplier’s contract and/or has engaged in due diligence (e.g. a business’ supplier due diligence practices).

A rice mill engages in responsible procurement practices including supplier due diligence and includes clauses in its supplier contracts requiring respect for workers’ human rights. Despite these controls, the mill procures paddy rice from a distributor that sources from a supplier employing child labour in rice farming.



Our risk identification and assessment processes

As a global company with an expanding footprint, SunRice Group has an international network of offices, facilities and operations,¹⁴ and a global network of rice and non-rice suppliers. To identify and assess our modern slavery risks globally, we rely on a range of internal and third-party tools that are outlined in the following sections.

While we note Australia’s increased EiQ risk rating from low to medium (see page 6), we have not identified any significant changes to our modern slavery risk profile over FY25.

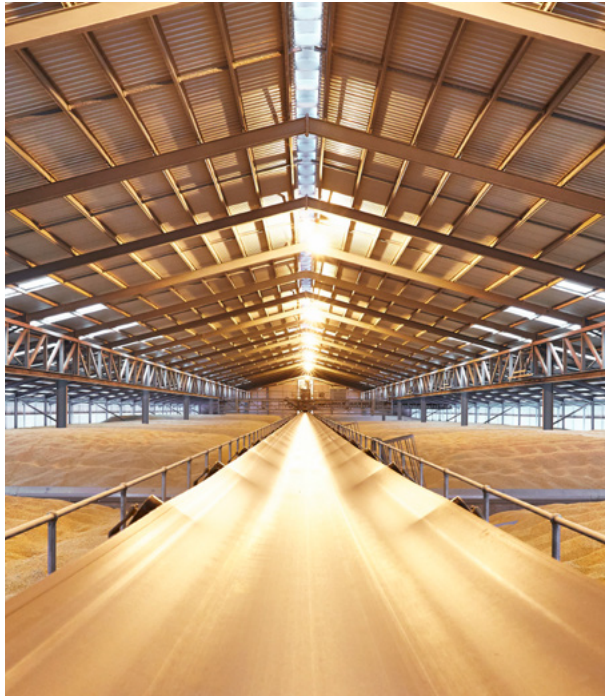
Potential risks of modern slavery in our operations

We have assessed that the risk of modern slavery in our supply chain is more significant than in our operations, however, the nature of our work and geographic locations mean there are some inherent risks of modern slavery in our operations.

Labour-related risks

In line with our FY24 Statement, we have assessed the risk of modern slavery in our operations as low due to the controls we have in place. However, our risk assessment highlights that there are potentially higher risks of modern slavery and other forms of labour exploitation among casual and seasonal workers, migrant workers (including those engaged through labour hire providers), and service-related roles such as cleaning, logistics or security. (See page 14 for specific risks relating to labour hire providers and facilities management services.)

The agriculture sector globally relies on temporary labour to meet the demands of seasonal activities such as planting and harvesting. In line with the industry more broadly, SunRice Group periodically uses labour hire providers to scale up operations in



response to business needs and seasonal demands (e.g. during harvest time). Meeting the heightened demands of seasonal activities may also create risks around excessive working hours, discussed further on page 20. We monitor and assess risk factors for migrant workers in our workforce including reviewing the risks within the agricultural sector that have been highlighted through the work of the NSW Anti-Slavery Commissioner.¹⁵

14. Operational sites include Australian Grain Storage (AGS) facilities, processing sites and manufacturing facilities.
15. Office of the NSW Anti-Slavery Commissioner. Be Our Guests: Addressing urgent modern slavery risks for temporary migrant workers in rural and regional New South Wales – Report under section 19(4) of the Modern Slavery Act 2018 (NSW) (2024). Available [here](#).

Geographic-related risks

Although all countries have modern slavery, some of our countries of operation have elevated risks, including PNG and Vietnam. For additional information on our geographic-related modern slavery risks, see the map on page 13.

Mergers and acquisitions (M&A) – related risks

During the reporting period SunRice Group acquired Simply Delish and SavourLife. Simply Delish is a food manufacturing company that manufactures some of Riviana Foods’ chilled products and SavourLife is a premium pet food business. As part of the acquisition process for each entity, an assessment was conducted to consider potential modern slavery risks relating to the acquisitions. Given the nature of these entities’ operations, the assessment found that their modern slavery risk profiles broadly align with those of the Group. Following the acquisition of SavourLife, we have included animal-related products (e.g. beef and seafood) in our list of higher-risk goods and services in our supply chain (see page 14).

As neither entity had a formal modern slavery risk management approach in place at the time of acquisition, during FY26 we will continue to integrate these businesses into the Group’s key governance policies and processes including those related to modern slavery.

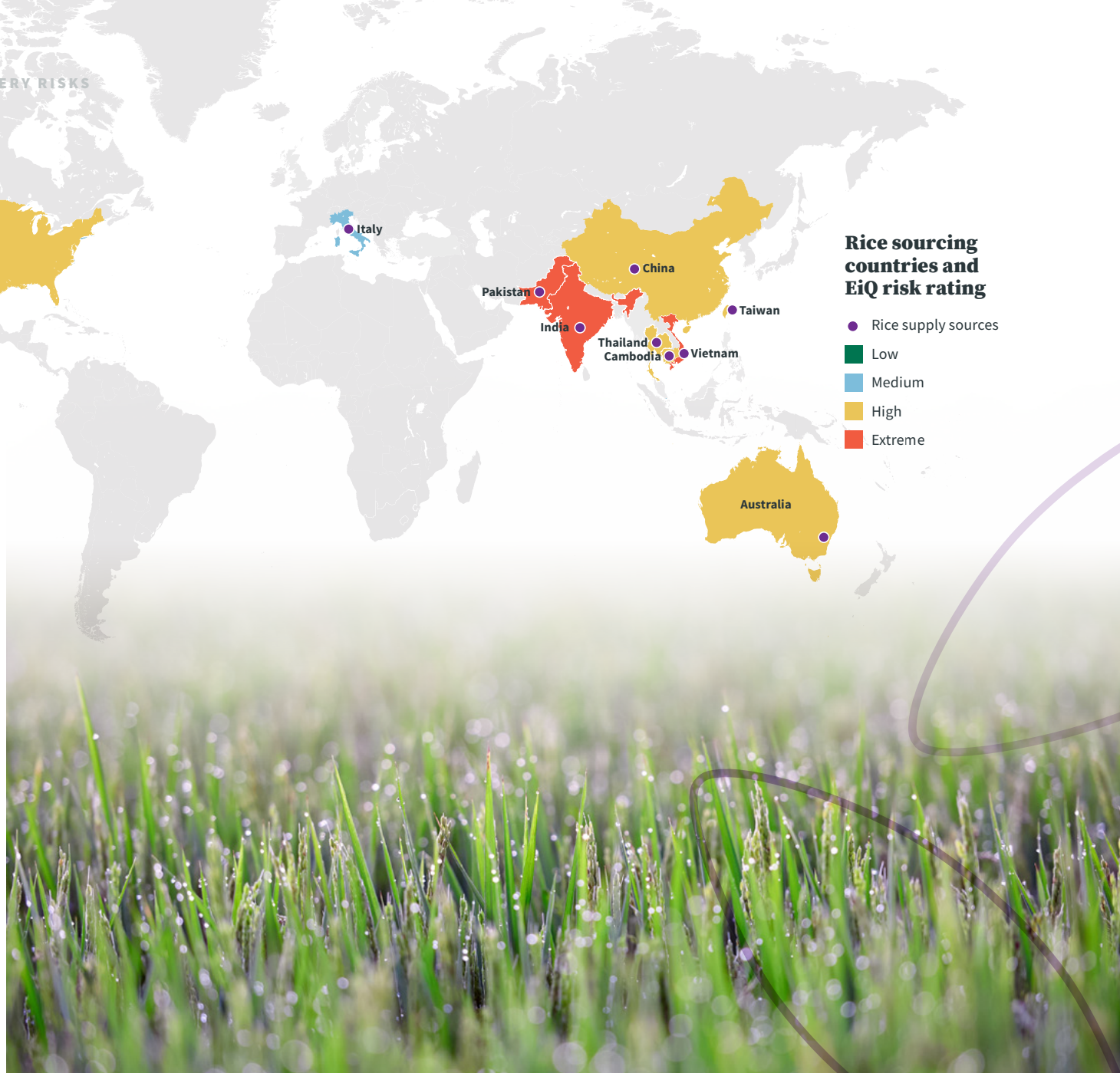


IDENTIFYING AND UNDERSTANDING OUR MODERN SLAVERY RISKS

Potential risks of modern slavery in our supply chain

Globally, the agriculture sector is recognised as carrying risks of modern slavery.16 While SunRice Group is a significant purchaser, processor and marketer of Australian rice grown in the Riverina region, where approximately 98% of Australia’s rice is grown,17 during the reporting period we continued to source rice from a diverse range of suppliers located in countries with reported high risks of modern slavery (as shown in the map to the right). The risk associated with rice in Australia has increased from medium to a high risk, primarily driven by environmental related factors, including climate change and water availability, rather than modern slavery-related risk. We have also identified that where we source rice or rice-based products indirectly through aggregators, brokers, co-manufacturers or mills, transparency of our supply chain may be reduced.

We have identified several goods and services that could be high-risk for modern slavery. These remain largely consistent with those identified in FY24 with the addition of animal-related ingredients following the acquisition of SavourLife.



Rice sourcing countries and EIQ risk rating

- Rice supply sources
- Low
- Medium
- High
- Extreme

16. US Department of State 2024 Trafficking in Persons Report. Available [here](#); International Labour Organization (ILO), Walk Free and International Organization for Migration (IOM) (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. Available [here](#); Office of Child Labor, Forced Labor and Human Trafficking, United States Department of Labor, 2022 List of Goods Produced by Child Labor or Forced Labor (2022). Available [here](#).

17. SunRice ASX Information Memorandum, p.73. Available [here](#).



IDENTIFYING AND UNDERSTANDING OUR MODERN SLAVERY RISKS

Goods and Services with high inherent modern slavery risks**Rice growing and harvesting****Potential modern slavery risks**

Forced labour, debt bondage, human trafficking, child labour, deceptive recruitment, underpayment of wages, excessive working hours.

Key risk factors

- Reliance on vulnerable or at-risk workers (e.g. lower skilled workers, child labour, migrant workers).
- Use of labour hire providers, with potential risks of misleading and exploitative recruitment practices.
- Pressure to meet seasonal demands, with potential risks of excessive working hours associated with rice growing and harvesting.
- Geographic risks, with rice growing and harvesting often occurring in countries with a higher prevalence of modern slavery.

Food processing and manufacturing

(e.g. milled rice, ready-to-eat rice, jarred fruit and vegetables)

Potential modern slavery risks

Forced labour, child labour, debt bondage, deceptive recruitment, underpayment of wages, excessive working hours.

Key risk factors

- Reliance on vulnerable or at-risk workers.
- Use of labour hire providers, with potential risks of misleading and exploitative recruitment practices.
- Geographic risks, with food processing and manufacturing often occurring in countries with a higher prevalence of modern slavery.

Labour hire providers**Potential modern slavery risks**

Debt bondage, deceptive recruitment, underpayment of wages.

Key risk factors

- Reliance on vulnerable or at-risk workers.
- Risks related to misleading recruitment, identity documentation retention and the charging of recruitment fees (potentially leading to debt bondage).
- Inconsistencies between international labour rights standards and domestic laws in some sourcing countries.

Animal-related ingredients (e.g. beef and seafood)**Potential modern slavery risks**

Forced labour, debt bondage, human trafficking, deceptive recruitment, underpayment of wages, excessive working hours.

Key risk factors

- Reliance on vulnerable or at-risk workers.
- Use of labour hire providers, with potential risks of misleading and exploitative recruitment practices.
- Geographic risks, including sourcing (e.g. of seafood) occurring in geographies with a higher prevalence of modern slavery.

Non-rice agricultural ingredients (e.g. wheat, barley)**Potential modern slavery risks**

Forced labour, debt bondage, human trafficking, child labour, deceptive recruitment, underpayment of wages, excessive working hours.

Key risk factors

- Use of labour hire providers, with potential risks of misleading and exploitative recruitment practices.
- Pressure to meet seasonal demands, with potential risks of excessive working hours associated with growing and harvesting.
- Geographic risks, with growing and harvesting can occur in countries with a higher prevalence of modern slavery.

Personal Protective Equipment (PPE) and uniforms**Potential modern slavery risks**

Forced labour, debt bondage, deceptive recruitment, underpayment of wages, excessive working hours.

Key risk factors

- Complex and opaque supply chains with potential high-risk inputs such as cotton and rubber.
- Reliance on vulnerable or at-risk workers.
- Geographic risks, with manufacturing of PPE and uniforms and the production of raw materials (e.g. cotton and rubber) often occurring in countries with higher prevalence of modern slavery.

Shipping and marine transport**Potential modern slavery risks**

Forced labour, debt bondage, human trafficking, child labour, deceptive recruitment, underpayment of wages.

Key risk factors

- Reliance on vulnerable or at-risk workers.
- Risk of hazardous work and poor living conditions.
- Limited visibility in shipping and marine transport, with challenges around gaining access or conducting audits.
- Uncertain regulatory framework as international waters are not governed by national labour laws.

Facilities management (e.g. cleaning, security, waste management, repairs and maintenance)**Potential modern slavery risks**

Debt bondage, deceptive recruitment, underpayment of wages.

Key risk factors

- Reliance on vulnerable or at-risk workers, including the use of temporary and casual labour.
- Use of labour hire providers, with potential risks of misleading and exploitative recruitment practices.

Plant and equipment**Potential modern slavery risks**

Forced labour, debt bondage, human trafficking, deceptive recruitment, underpayment of wages.

Key risk factors

- Complex and opaque supply chains with the potential high-risk inputs such as steel and electronics.
- Reliance on vulnerable or at-risk workers.
- Geographic risks, with the manufacturing of equipment and extraction of raw materials (e.g. iron ore, bauxite ore) often occurring in countries with a higher prevalence of modern slavery.



Assessing and addressing our modern slavery risks

Governance

Our governance framework supports our approach to sustainability, including modern slavery risk management.

During FY25, we operated under our existing Sustainability Framework. This included the Supplier Sustainability Program (SSP) which provided a structured approach to managing modern slavery and broader human rights risks in our operations and supply chain. The cross-functional SSP Steering Committee had oversight of the SSP. In FY25 we updated our governance structure to support the implementation of our new Sustainability Strategy. The governance structure will come into effect in FY26.



GOVERNANCE OF MODERN SLAVERY RISKS AT THE SUNRICE GROUP

SunRice Board

Oversight and monitoring of the Group's sustainability performance and systems and processes for legal and regulatory compliance, including with the Act.

Safety, Health and Sustainability (SHS) Committee

Oversight of health, safety and sustainability matters for our own operations and, for sustainability, the Group's supply chain, including the SSP. Updates on sustainability performance are shared with the SHS on a quarterly basis.

SunRice Group CEO and CMT

Oversight and monitoring of the implementation of the health, safety and sustainability strategies and compliance framework across the Group's operations including, for sustainability, the Group's supply chain.

SSP Steering Committee

Responsible for identifying and determining actions to address modern slavery risks across our operations and supply chain, including advising on supplier issues as they arise and identifying any issues that should be escalated to the CMT, SHS Committee and/or the SunRice Board. Monitors changes to the modern slavery landscape including any potential changes to the Act. Meets a minimum of four times per year, or more frequently if required.

Membership includes senior representation from the CMT; P&C; Finance and Risk; Sustainability; HWSE; Procurement; and our businesses segments (Global Rice, CopRice and Riviana), including the International Sourcing, Research and Development and Quality functions.

Group Sustainability

Responsible for day-to-day implementation of human rights risk management, including escalating issues as required and defining the SSP Strategy.



Policies

SunRice Group has a range of policies relevant to modern slavery risk management which are outlined in the table to the right and continued on the next page. These policies are endorsed by the CMT, with certain Group-wide policies requiring SunRice Board approval, and are part of our broader governance framework.

A key focus in FY25 was to review and update several policies underpinning our modern slavery risk management approach, including our Supplier Sustainability Code and Labour Rights Standards Policy. We also developed a Group Sustainability Policy and a Human Rights Statement. The Group Sustainability Policy replaces our ESG Commitment.

In our FY24 Statement, we committed to finalising guidelines for the provision of any accommodation to our workers globally. SunRice Group has ceased any arrangements through which accommodation was being provided to individuals engaged through labour hire providers. If our position changes, we will provide an update in future Statements.



SunRice Group Sustainability Policy

Relevance to modern slavery

Sets out our Group-wide sustainability principles and commitments. These include our commitment to meeting our responsibility to respect human rights as set out in the UNGPs and to meaningful, open communication with our stakeholders. It also sets out the role of the Board and our Group Sustainability function in managing sustainability risk.

Implementation

Our SunRice Group Sustainability Policy was developed during the reporting period and approved by the Board in June 2025. In FY26, we plan to promote awareness of the Policy across the business. This Policy replaced the ESG Commitment.



SunRice Group Code of Conduct

Relevance to modern slavery

Defines our standards, values, and behaviours in terms of how we operate as a business, including our commitment to the UNGPs. It places expectations on employees, suppliers and their suppliers to respect all human rights, including labour rights, throughout their business activities. Specifically, it confirms that the use of child labour is not tolerated.

Implementation

Employees receive mandatory training on the Code of Conduct as part of their induction training. The training is required to be completed every two years. Information related to the Code of Conduct is also included in the Group's Employee Handbook.



Human Rights Statement

Relevance to modern slavery

Sets out our Group-wide commitment to human rights and outlines the Group's approach to human rights risk management including to human rights due diligence, grievance management and remediation.

Implementation

Our Human Rights Statement was developed during FY25 and received endorsement by the CMT in June 2025. In FY26, we plan to promote awareness of the Statement across the business.



SunRice Group Speak Up Policy

Relevance to modern slavery

Governs our whistleblower mechanism and processes, and clearly defines our investigation and escalation processes. Human rights-related concerns, including those related to modern slavery, can be raised through the Speak Up channels by a range of persons including employees, contractors, supply chain workers and those who come into contact with our operations.

Implementation

This Policy is available on our website in English, Vietnamese, Arabic, and Pidgin. Our internal Speak Up Ambassadors (located in Vietnam and PNG) receive specific training regarding anti-bribery and corruption and deliver Speak Up training to those employees who do not have access to the required technology or who need support in local language. The Ambassadors also promote the Policy and are available to provide workers with an option of raising issues with a trusted internal representative.

Information related to the Speak Up Policy is included in the Group's Employee Handbook.





SunRice Group Labour Rights Standards Policy (internal)

Relevance to modern slavery

Outlines our commitment to the ILO Core Conventions, including the Forced Labour Convention, 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105). Specific focus is placed on freedom of association, forced labour and human trafficking, child labour, working hours, wages and benefits, servitude, diversity and inclusion.

Implementation

The expectations outlined in our Labour Rights Standards Policy are included as a key component of the training associated with the Code of Conduct, the Supplier Sustainability Code and the Group’s mandatory modern slavery training.

Any employees, former-employees, contractors or supply chain workers can make a report including in relation to labour rights through Speak Up.

During FY25, we started updating our Labour Rights Standards Policy. This will be finalised in FY26.



Group Procurement Policy (internal)

Relevance to modern slavery

Outlines the principles and policies to be adopted by SunRice Group as part of the procurement process and includes specific expectations related to modern slavery (e.g. no use of child labour and zero tolerance for modern slavery and human trafficking, including forced, bonded, or involuntary labour). It includes a procurement risk assessment guide which considers modern slavery issues.

Implementation

During the reporting period the Policy was communicated to relevant internal team members through team meetings and site visits.



Grievance Policy (internal and Australia only)

Relevance to modern slavery

Outlines how SunRice Group addresses workplace grievances, aiming for a harmonious environment by resolving conflicts promptly and fairly. It defines the steps for raising grievances, outlines the resolution process, and highlights confidentiality and accountability. This policy applies to Australian employees only.

Implementation

The Grievance Policy is made available to employees via our internal intranet.

During FY25, we started updating our Grievance Policy to further align it with the UNGPs effectiveness criteria for company operated grievance mechanisms. This Policy will be finalised during FY26.



SunRice Group Supplier Sustainability Code

Relevance to modern slavery

Outlines our standards and expectations of sustainability-related business practices, including in relation to human rights and modern slavery, for suppliers across SunRice Group. The Code includes provisions on fair wages and benefits, ethical recruitment practices and workers’ rights to freedom of association.

Implementation

We updated our Supplier Sustainability Code in FY25. See the case study to the right for further details.

Clauses referring to the Supplier Sustainability Code are included in most of our contracts to outline our expectations of our suppliers and support compliance with our Code.

Case study: Updating our Supplier Sustainability Code

We started reviewing our Supplier Sustainability Code in FY24 with the goal of enhancing and simplifying communications with our suppliers, making our expectations of them easier to understand and aligning the Code with international standards, including the UNGPs, and peer practice. The review also considered current and emerging regulatory requirements and customer expectations.

These goals informed the development of a streamlined Supplier Sustainability Code in FY25, which focuses on core sustainability-related expectations of our suppliers across environment, human rights and governance. The updated Code provides further context in areas that we have identified as having a higher level of risk in our supply chain including in relation to the use of recruitment fees, the use of labour hire providers, and migrant workers’ understanding of their employment rights. The Code also outlines the steps SunRice Group may take to monitor and support supplier compliance, including conducting supplier assessments, requesting social and ethical audits, and collaborating on corrective action plans to address identified issues. The Code will help us pave the way for partnering with our suppliers on continuous improvement initiatives.

Further, the Code sets out the Group’s approach to remediation in line with the UNGPs, providing details of the Group’s Speak Up hotline for suppliers to access and also requires suppliers to have their own grievance mechanisms in place.

In FY26, we intend to roll out the updated Supplier Sustainability Code including providing a guidance document for suppliers and to translate the Code into multiple languages to improve accessibility.



Operational risk management

We have controls that govern our recruitment and employment arrangements, which aim to mitigate modern slavery risks in our operations including our Code of Conduct and Labour Rights Standards Policy (outlined in the table on pages 16–17). Other controls include mandatory modern slavery training for employees, an accessible grievance mechanism and dedicated ambassadors in some offshore locations to promote reporting channels and manage additional geographical risk (discussed further on pages 23 and 25–26). Further details of our operational risk management approach are outlined below.

Operational social and ethical audit program

Our audit program helps to identify and assess modern slavery risks related to our operations. Building on lessons learned from previous years, we have now established a standardised and cross-functional approach to conducting audits. Our approach is outlined in the diagram on the right.

During the reporting period, social and ethical audits were conducted using the above methodology at our Deniliquin Mill, CopRice Leeton facility, SunFoods Mill in California and our SunFoods Hawaii operational site. No issues related to modern slavery were identified during the audits.

Following the conclusion of another year of our audit program, we have seen increased maturity in its implementation across the business. A key insight has been the value of the active collaboration between site and Group functions in the audit process, and the development and implementation of corrective action plans. The audit program also provides a means for communicating our human rights performance to our customers.

We also continued to address the findings identified through previous operational audits. While no issues related to modern slavery were identified, the FY24 audit of our Vietnam site highlighted opportunities to improve how we record working

hours, manage payslips and handle overtime periods. In response, we developed and implemented a corrective action plan. Our P&C Team conducted a site visit to review the use of the record-keeping system related to working hours and subsequently implemented a more centralised and consistent approach. The site visit also

included training for workers and supervisors to understand this new system. Following an internal review to assess compliance with the new system, it was identified that supervisors would benefit from further training on the new process. Training will continue in FY26.

Social and ethical audit process

1. Pre-audit preparation

- Group Sustainability works with leaders across the business, including site leads, to enhance understanding of the SMETA audit protocol, including the SMETA Supplier Self-Assessment Questionnaire (SAQ), and how the site will be assessed.
- “Toolbox Talks” are held with the site team to help prepare them for the audit process and inform them of what to expect.
- All site employees receive training on the ETI Base Code and SunRice Group’s Speak Up mechanism. For more information on the training, see page 23.
- Workforce composition is reviewed to understand any considerations for the audit process including language or cultural considerations. For example, prior to conducting the audit of our SunFoods Mill in California in FY25 and with the knowledge that over 60% of the workforce speak Spanish, we selected a third-party auditor fluent in Spanish and provided Spanish audit materials to workers.

2. Audit

- The social and ethical audits are conducted by independent third parties using the SMETA 4-Pillar methodology, which assesses practices against Labour Standards, Environmental, Health and Safety, and Business Ethics. The process is conducted by a SMETA approved auditor and is designed to identify risks to workers related to unsafe working conditions, overwork, discrimination, underpayment and forced labour.
- The audit process includes a site tour and interviews with some workers.

3. Audit debrief and corrective action plan development

- Debrief meetings are held with a cross-functional team to discuss the findings, identify relevant internal stakeholders and develop corrective action plans addressing any non-compliances and other findings. These meetings include representatives from the site and Group functions to ensure that the sites have the necessary support to address any identified findings.

4. Ongoing monitoring and close out

- Audit findings are tracked and monitored at a site level to ensure they are addressed, and at a Group level to identify recurring issues.
- Audit outcomes, along with progress on and completion of corrective actions, are reviewed during SSP Steering Committee meetings and reported to the CMT, at the SHS and Finance, Risk and Audit (FRAC) Committees (as required) of the SunRice Board.



Mitigating risks associated with M&A and new country screening

Prior to establishing an operational presence and/or sourcing from a new country, SunRice Group conducts a risk assessment to identify, evaluate and mitigate a range of risks including governance, economic, environmental and human rights risks. A cross-section of our business is included in the risk assessment and decision-making process, including International Sourcing, Quality, Sustainability, Logistics, Risk, Treasury and Legal. In FY25, we conducted risk assessments on prospective suppliers and customers, with some of these operating in high-risk jurisdictions. This extended due diligence process included a desktop review of each entity's operating environment, ownership structure, site locations and potential risks, including those related to modern slavery. To further support our due diligence activities, we requested a third-party audit for two potential suppliers' sites related to the supply of goods which will be conducted during FY26.

In addition, as part of the process to acquire Simply Delish and SavourLife, we conducted environmental and social due diligence on the businesses' operations and supply chain. This included desktop research, direct engagement with the entity and high-level analysis of key ingredients and country of origin sourcing.



Mitigating risks associated with labour hire providers

We engage labour hire providers to support our work during busy seasonal periods such as harvest. As referenced earlier (see page 12 and 14), engaging labour hire providers may involve risks associated with modern slavery.

To assist with managing these risks, our agreement with labour hire providers includes specific modern slavery clauses and provisions. The provisions assist with ensuring that each worker has the appropriate skills, training and qualifications for the role; that they have the legal right to work in Australia; and that they will undergo any training requested by the Group. In addition to contractual

protections we are committed to strengthening our approach to monitoring the performance and compliance of our providers against these commitments. This additional monitoring will be an area of focus in FY26.

During the reporting period, we reviewed our Labour Rights Standard Policy and Labour Hire Engagement Procedure with the aim of providing clarity on the roles and responsibilities of SunRice Group and labour hire providers. Updates to these documents will be reported on in our FY26 Statement.



Mitigating risks associated with working hours

The agricultural sector involves inherent risks related to working hours due to the seasonal nature of the work, including during harvest. Labour shortages can also create additional challenges. In Australia, for example, some seasonal workers seek to work additional hours to increase their income during harvest period and opt to work elsewhere if the desired hours are not available. Given this dynamic and complex operating environment, we continue to monitor risks related to excessive working hours across our business.

As noted in our FY24 Statement, we established a working group to review seasonal hours to further understand these issues. The working group met at the start of the Australian harvest season (November 2024) and after harvest (May 2025). The sessions included representatives from Sustainability, HWSE, Operations, P&C and our labour hire provider. The sessions aimed to confirm existing controls and identify any lessons learnt from managing peak period risks related to working hours and fatigue. Existing controls for identifying and mitigating these risks included fatigue management protocols, a tool for tracking hours and days worked (monitored by management), advanced planning for labour hire requirements (including the number of workers required) and a reporting mechanism for instances where longer hours were worked. It was noted at the meetings that our labour hire provider had conducted right-to-work and age verification checks, provided Fair Work fact sheets to casual workers and had mechanisms in place for raising grievances.



The sessions identified opportunities to further strengthen our processes which we will progress in FY26, including by:

- Conducting an annual risk assessment prior to harvest;
- Enhancing fatigue policies and associated guidelines; and
- Ensuring early engagement with our labour hire provider to confirm their understanding of our expected requirements and that they have the correct controls in place for the harvest period.

Mitigating risks associated with younger workers

There are risks associated with younger workers in the agricultural and manufacturing sector globally. These risks are particularly relevant to our supply chain but may also be present in our operations. As such, we have processes in place to ensure risks related to younger workers in our operations are identified and addressed. These are included in our Child Labour Remediation Guideline which outlines our commitment to global labour standards, prohibits hiring individuals under the jurisdiction’s legal working age, and provides guidance on actions to remediate child labour including terminating the employment and supporting the child to access schooling. To help reduce risks, we use a third party to screen individuals upon job application to check that they are of legal working age.





ASSESSING AND ADDRESSING OUR MODERN SLAVERY RISKS

Supply chain risk management

Supplier segmentation

Our supplier risk assessment methodology categorises suppliers into four segments based on the inherent risk of the supplier (provided via the EiQ platform which considers geography, sector, product, services and labour, including modern slavery, related risks) and our spend with suppliers. Spend with a supplier is only one indicator of the leverage we may have to influence change. Other factors include the nature of the engagement (e.g. strategic or transactional) and market dynamics and factors that we consider through cross-functional engagement with key supplier relationship owners across the business.

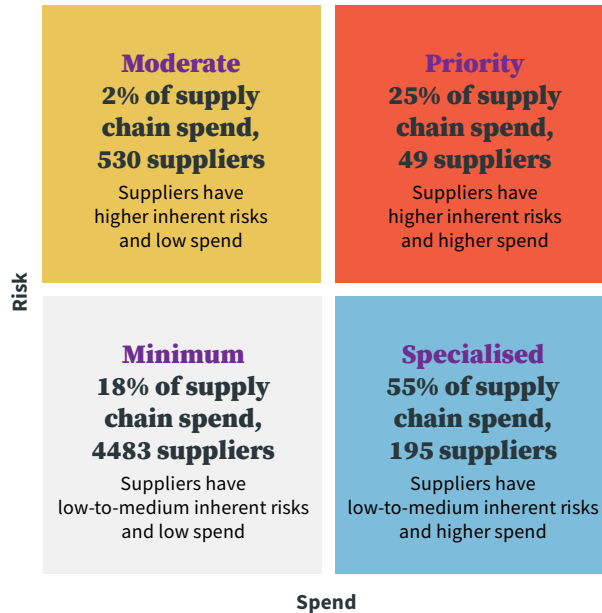
Leverage

The UNGPs use the term “leverage” in reference to the influence that businesses have over other entities, such as suppliers, contractors and business partners, to prevent and address adverse human rights impacts. Understanding our potential leverage allows us to identify where we can drive the greatest impact and informs our approach to supplier engagement.

Leverage can come in many forms, for example, traditional commercial leverage which sits within the activities a company routinely undertakes in commercial relationships, such as contracting, or broader business leverage that a company can exercise through non routine activities, such as supplier capability building. Where a business has limited leverage, they may seek to increase it through collaboration with other entities or groups such as through multi-stakeholder collaboration with business peers, governments, international organisations and/or civil society organisations.

Comparing our FY24 segmentation data to our FY25 data, we observed that the spend in each quadrant is consistent, however there has been an increase in the number of suppliers in the “Minimum” segment and a decrease in the number of suppliers in the “Moderate” segment. This is primarily attributed to an improvement in some country risk ratings and an increase in total suppliers, primarily with lower risk.

Overview of supplier segmentation¹⁸



18. Percentage refers to supplier spend per segment.

Supplier screening

All new suppliers are screened, using an online tool, for politically exposed persons, state owned entities, regulatory and law enforcement activity, adverse media and sanctions. In line with our External Parties Policy, if this initial due diligence identifies issues of concern, further due diligence may be carried out. We use EiQ to undertake a risk assessment of high-risk suppliers based on the supplier segmentation process and screening process as shown below.

New priority suppliers

Screening may occur through procurement or as part of our NPD process (see, page 22) through an SAQ. If issues or areas of concern arise, an audit will be requested.

Conduct initial due diligence via online tool.

Contract clauses requiring the supplier to adhere to our Supplier Sustainability Code are included in the majority of contracts.

Existing priority suppliers

Selected priority suppliers are reviewed on an ongoing basis and an SAQ may be requested or an audit if any red flags are identified. We also review existing audit reports through SEDEX or audit reports provided to us by suppliers.

Suppliers that remain high-risk post screening

Decisions regarding suppliers that remain high or extreme risk after a detailed risk assessment, and suppliers that do not engage with us regarding their modern slavery practices, are escalated to our CMT, SHS Committee and if necessary, the SunRice Board.



Case study: Continued engagement with supplier on audit findings

In FY25, we continued to engage with suppliers on findings from audits conducted in FY24. This included matters related to the charging of recruitment fees by two suppliers based in Southeast Asia.

Through a follow-up third-party audit conducted in FY24, we were able to gain further insights into how the matter with one of these suppliers was managed. SunRice were satisfied with the approach taken and that the risk had been reduced through the close out of audit findings. We continued engaging with the other supplier during FY25 to address the issue. This led to the supplier implementing new controls, including communicating expectations to their labour hire providers regarding the prohibition of recruitment fees. The supplier also terminated its relationship with one of its providers that was unwilling to change its practices. These improvements in practices were confirmed via a third-party audit which was conducted during FY25.



Embedding modern slavery risk identification and assessment into New Product Development (NPD)

The Global Rice NPD process uses an online project management tool that manages the flow of the project from concept to market. The process is also supported by an integrated IT system addressing Product Lifecycle Management (PLM). As part of the approval process to proceed to the next stage of development for a product, the Sustainability team undertakes a sustainability risk assessment that focuses on the product's supply chain and includes consideration of modern slavery. The level of risk associated with the supplier will inform the steps taken which may include further due diligence, collaboration on risk mitigation strategies with a supplier and/or escalation to the SSP or CMT for further consideration.

Providing a process for structured engagement between the Sustainability team and cross-functional project teams allows for early identification of any modern slavery risks and a streamlined due diligence process across the business segments. This early and ongoing engagement also resulted in increased capability across internal teams to recognise potential human rights risks. In FY25 we further embedded sustainability considerations into our NPD process by updating the PLM system to host a sustainability-focused supplier SAQ which includes questions related to modern slavery.

Spotlight on our Supplier Self-Assessment Questionnaire (SAQ)

During FY25 we continued to roll out our SAQ to suppliers across priority categories. The SAQ covers material topics such as modern slavery and deforestation and reflects the ETI Base Code. During the reporting period, we updated our SAQ to include additional questions related to modern slavery risk management. The SAQ is embedded through NPD processes within the Global Rice business unit (with an initial focus on rice, co-manufacturing and packaging) and is being piloted within Riviana. It has also been integrated into Group tenders.

Where social and ethical audit reports are available (e.g. through Sedex or amfori Business Social Compliance Initiative (BSCI)), they are reviewed in parallel to the SAQ. The results of these reviews enable us to identify potential areas of risk which prompt deeper engagement with suppliers to further understand their risk profile and approach to risk management.

Sixty-four suppliers completed the SAQ during the reporting period, including those involved in packaging, co-manufacturing and raw material supply. This included 13 priority suppliers identified through our supplier segmentation process. We reviewed the responses and followed up with suppliers to clarify any issues of concern. The SAQ responses enabled us to conduct a sustainability risk analysis, including modern slavery, and, through a structured escalation framework, generated a risk score for each supplier.

Our SAQ has been developed to support, rather than replace, supplier engagement. We take a collaborative approach to supplier engagement and have found that we are better equipped to understand the supplier's operating context and agree on solutions when we engage directly with our suppliers.



ASSESSING AND ADDRESSING OUR MODERN SLAVERY RISKS

Training

Key to the success of our approach to modern slavery is to build capability across the Group. Our training modules are aimed at helping employees understand SunRice Group’s expectations and how these expectations relate to their roles and responsibilities, and support the goal of embedding our commitment throughout the business. In May 2025, we made our forced labour e-learning module titled *Recognising the risks of Modern Slavery* available to our Australian Rice Growers via the Grower Portal.

Our Approach to Sustainability: *Recognising the risks of Modern Slavery*

This module provides an overview of modern slavery including its prevalence, indicators and key risks for our business. The training also provides information on the requirements of the Act, and how to raise concerns. This module is mandatory for all permanent employees and must be completed every two years.

90% compliant in FY25
(based on those who it was issued to¹⁹)

Our Approach to Sustainability: *Supplier Sustainability Code*

This module covers key elements of the Supplier Sustainability Code (prior to the FY25 update) including modern slavery, SunRice Group’s Speak Up Policy, and the expectations and responsibilities of suppliers and SunRice Group.

80% compliant in FY25
(based on those who it was issued to¹⁹)

Board training on human rights

During FY25, we engaged a business and human rights expert to develop and deliver training for our Directors and CMT members. The training outlined businesses’ responsibilities under the UNGPs and covered a broad range of human rights topics, including modern slavery, human rights due diligence and managing human rights related risks. The session was held in May 2025.

ETI Base Code training for workers at operational sites

Our Sustainability team, in partnership with the on-site operational teams, uses our site audits as an opportunity to deliver training on the ETI Base Code to our on-site teams prior to each audit. The training takes participants through the nine key principles of the ETI Base Code and the standards they are entitled to in the workplace under the Code, providing practical examples to illustrate each principle. The training also explains the audit process, that workers should feel free to speak openly and that their information will be kept confidential.

During the reporting period, 67% of all workers at the audit sites completed the ETI Base Code training. The remainder of workers at each site completed the training outside of the FY25 reporting period.



Thuy Duong Le, P&C Manager – Asia, conducting ETI Base Code training at Ricegrowers Vietnam.



19. We have identified an opportunity to increase the number of employees completing the relevant modules. We will work to close the gap in FY26.



Collaboration and engagement

We engaged in numerous forms of collaboration and engagement throughout the reporting period to deepen our understanding of modern slavery and inform our approach to modern slavery risk management. These engagements are outlined in the table to the right.

Our approach to collaboration, particularly in relation to human rights due diligence, grievance management and remediation is also outlined in our Human Rights Statement.

Engagement	Key stakeholders	Overview
UN Global Compact Network Australia (UNGCA) Modern Slavery Community of Practice (MSCoP)	Business and other stakeholders including civil society and government	Engagement in the MSCoP has provided a space to learn and discuss opportunities and challenges relating to modern slavery and share leading interventions to improve approaches to modern slavery risk management.
UNGCA 2024 Annual Dialogue on Business and Human Rights	Multi-stakeholder	Participation in the Dialogue provided insights into emerging human rights risks and challenges including related to modern slavery. It also assisted us in monitoring relevant international developments and provided opportunities to connect with diverse stakeholders.
UN Global Compact (UNGC) Accelerator Program	Multi-stakeholder	Representatives of SunRice Group participated in the UNGC’s Business and Human Rights Accelerator, a six-month program aimed at supporting businesses to establish ongoing human rights due diligence processes in line with international standards.
NSW Anti-Slavery Commissioner Annual Modern Slavery Forum (2024)	Multi-stakeholder	Participation in the Forum enabled us to deepen our understanding of modern slavery risks in NSW, including risks related to areas in which we operate such as the Riverina Region of NSW.
Australian Government’s Modern Slavery Expert Advisory Group	Government	Our Group Head of Sustainability’s participation in the Expert Advisory Group allows us to offer insights into the practical application of the Act to the Australian Government and identify opportunities to raise awareness and capacity within the business community. It also provides a space for us to enhance engagement with other key stakeholder groups.
Engagement with retailers	Customers	We engaged with several of our retail customers during the reporting period in relation to modern slavery. Throughout this engagement we have observed an increased awareness of human rights-related issues throughout the value chain in Australia and internationally. This has led to increased expectations, including from customers, for SunRice Group to demonstrate that we are effectively assessing and addressing modern slavery risks.
SEDEX Member Session	Multi-stakeholder	The Sustainability team’s participation in this session offered an opportunity for cross-industry learning on good practice use of social and ethical audits in a businesses’ operations and supply chain.
Monash University	Academia	We engaged Monash University to conduct a benchmarking review of our FY24 Modern Slavery Statement to assess the quality of our disclosure.



Grievance mechanisms and remediation

Commitment to remediation

If we identify a modern slavery related incident in our operations or supply chain, we will investigate. Our response (including the use of leverage with business partners and our role in any remediation) will depend on a range of factors including our level of involvement.

In line with the UNGPs, SunRice Group is committed to providing for, or cooperating in, effective remediation where we identify that we have caused or contributed to modern slavery. If we identify that we are directly linked to modern slavery, we will seek to use our influence to play a role in remediation.

Overview of our grievance mechanisms

Internal grievance mechanism

The SunRice Group Grievance Policy, which applies to our Australian employees, aims to promote a harmonious working environment by providing a process to raise and resolve internal grievances. It outlines the steps for raising personal work-related grievances, the resolution process including the possibility of mediation or conciliation, and the underpinning principles of confidentiality and accountability. Outcomes from this process can include an apology, targeted training, changes to working arrangements and/or disciplinary action. Where a grievance relates to misconduct beyond an employee's personal circumstance, the Speak Up Policy and whistleblower program is available.



Speak Up!

Speak Up Policy and whistleblower program

Who?

Speak Up provides an avenue for a range of persons to make a report about anything that they have reasonable grounds to suspect concerns, misconduct, or an improper state of affairs or circumstances, in relation to any member of SunRice Group. The Speak Up Policy is available to those who are or have been an employee, officer or director of a member of SunRice Group, as well as others with a connection to SunRice Group such as suppliers of goods or services to an entity in SunRice Group, contractors, consultants and other business partners (including someone who is or has been employed by a supplier), or a relative, spouse or dependent of any of these individuals. This includes workers in our supply chain and community members.

What?

Reportable conduct can include any potential breach of the law or our key policies including our Code of Conduct, Anti-Bribery and Corruption Policy and our Supplier Sustainability Code. This includes issues related to human rights including labour exploitation and modern slavery.

How?

A Speak Up report can be made in writing or verbally including to:

- The Integrity Officer;
- A Director or member of the CMT;
- The Speak Up hotline (phone, QR code, online – see next page for details); and
- An Ambassador (for those working in PNG, Solomon Islands and Vietnam) or General Manager.

When?

The Speak Up hotline is administered by NAVEX Global, an independent third party and is available 24 hours a day, seven days a week.

Key elements

- The Speak Up Policy is available in English, Vietnamese, Arabic and Pidgin;
- Confidentiality protected;
- Option for anonymous reporting (through the Speak Up hotline);
- All reports are taken seriously;
- Commitment to non-retaliation and reprisals;
- Ongoing communication with complainants;
- External third-party support (as required); and
- Ambassadors to promote the mechanism.

How we seek to build awareness of Speak Up

Grievance mechanisms are only effective if they are known, accessible to, and trusted by, the users they are designed to serve.

As such, we seek to raise awareness of our Speak Up whistleblower program with our employees in a number of ways.

- Information on our Speak Up program is included in SunRice Group’s Code of Conduct, and the updated Supplier Sustainability Code. It is also discussed as part of our pre-audit engagement on our operational sites and in our induction training sessions.
- Guidance materials including posters for our grievance channels are displayed in our own facilities and we promote the Speak Up hotline in our internal newsletter, which is distributed to all staff with email addresses, and displayed in lunchrooms at some of our facilities.

We have Anti-Bribery and Corruption Ambassadors located in PNG and Vietnam to promote the Speak Up mechanism. The Ambassadors also make themselves available to employees to provide them with the additional option of raising issues with a trusted internal representative.

Training to promote understanding and awareness of our Speak Up program is conducted both online and face-to-face. The training provides an overview of relevant SunRice Group policies (including the ABC Policy), the rights of and the protections for employees and how to make a report.

Speak Up reporting during FY25

Data on the number and outcomes of Speak Up reports is provided twice a year to the SunRice Board’s FRAC by the Integrity Officer. The information includes key issues and themes arising from the reports and steps taken to ensure anonymity is protected.

No modern slavery-related reports were made in FY25. However, the absence of reports does not necessarily indicate the absence of occurrences or risks. We will continue to monitor reports for precursors to human rights related matters, including modern slavery, and to work to improve the effectiveness of our grievance management.

Speak Up!

Bribery or corruption

Forced to work

Underpaid

Underage workers

Bullying or abuse

Unsafe work environment

Encounter any of the above? If so, speak up.

To report a concern to SunRice directly:
 Email ABC_reporting@sunrice.com.au
 Post PO Box Q166 Q/B, Post Shop, NSW 1230, Australia
 Call +61 2 9268 2074

To report a concern to our independent Speak Up hotline:
 Online sunrice.ethicpoint.com
 Australia 1800 953 947
 US 833 561 0346
 Singapore 800 852 3976
 PNG 000 861 271
 Vietnam Dial the direct access number for your location: 1 201 0288 or 1 228 0288. Then, dial 833-581-0346 and follow the prompt.

Scan QR code to make a report:
 Speak Up is a service managed by an independent third party. It provides an avenue for SunRice employees and suppliers and their workers to report issues confidentially and anonymously.

ZERO TOLERANCE **Make a Difference**

SUNRICE **Cop Rice** **ags** **Sunfoods** **Riviana** **APC** **FRAC**

Assessing the effectiveness of our approach

Demonstrating the impact of our modern slavery program is critical to us. We remain committed to continuous improvement, including evaluating the effectiveness of our actions to address modern slavery.

Embed robust governance systems for the SunRice Group's operations on human rights including modern slavery

Key outcomes in FY25

- Updated our sustainability governance framework (to be implemented in FY26) which includes a specific focus on human rights.
- Delivered work to review, update and/or develop policies and guidelines including our Labour Rights Standard Policy and Supplier Sustainability Code.
- Developed our first Human Rights Statement.
- Convened four meetings of the SSP Steering Committee.
- Engaged Monash University to undertake a benchmarking review of our FY24 Modern Slavery Statement against ASX100 and ASX300 companies. The review resulted in an A grade.

How this helps us to assess effectiveness

Through the SSP, we review key actions taken to address modern slavery, including our audit plan, to understand how well they are managing our modern slavery risk.

Reviewing our governance framework and policies helps us to evaluate whether they remain fit-for-purpose, including as our operating environment evolves. This has led to an update of a number of policies, guidelines, procedures and frameworks across SunRice Group during FY25, which will continue in FY26.

Monash University's review of our FY24 Statement helps us to understand where we can improve our risk management and disclosure approach in line with industry practice.

Implement a social and ethical audit plan at SunRice Group sites that prioritises sites based on human rights-related risks associated with our operations

Key outcomes in FY25

- Conducted four SMETA audits on our Deniliquin Mill, CopRice Leeton facility, Sunfoods Mill in California and our SunFoods Hawaii operational site.

How this helps us to assess effectiveness

Audits help us to understand whether we have consistent compliance with local legislation and the ETI Base Code across our operations. Audits also help us to identify opportunities for us to work with business partners to improve policies and practices to address identified non-compliances.

Strengthening our modern slavery risk identification and assessment processes helps us to understand the extent to which our expectations are being implemented by our employees and suppliers.

Minimise the risk of labour rights abuses in our operations and supply chain

Key outcomes in FY25

- Further embedded modern slavery risk identification and assessment into the Global Rice NPD and PLM processes through the integration of an automated SAQ for suppliers.
- Continued to roll out the *Recognising the risks of Modern Slavery* e-learning module to employees and made it available to Australian Growers.
- Worked with our operational sites to strengthen or establish risk assessment processes, systems and procedures to address non-compliances identified through SMETA audits.
- Continued to incorporate sustainability considerations, including related to human rights, in M&A processes and new country entry.

How this helps us to assess effectiveness

Strengthening our modern slavery risk identification and assessment processes helps us to understand the extent to which our expectations are being implemented by our employees and suppliers.

Build internal capability to identify and remediate issues as they arise

Key outcomes in FY25

- Developed and delivered training on human rights to our Board of Directors and CMT.
- Delivered training on the ETI Base Code to employees at sites audited in FY25, including providing information on how to raise a concern through Speak Up.
- Participated in multi-stakeholder events on modern slavery and broader human rights issues.
- Monitored reports from Speak Up with data provided twice during the year to the SunRice Board's FRAC by the Integrity Officer.

How this helps us to assess effectiveness

Providing modern slavery training helps us strengthen the capability of our people to identify and report modern slavery risks.

Monitoring reports from Speak Up and other channels enables us to detect patterns, guide due diligence measures and shape policy development.

Hearing about peer practices (including how they respond to challenges) provides an opportunity for learning and helps us identify opportunities to keep improving our approach.

Foster open and trusted supplier relationships to identify and remediate labour rights issues across our supply chain

Key outcomes in FY25

- Engaged with priority suppliers on audit findings, SAQ results and on the development of corrective action plans, including following up with suppliers on how non-compliances were addressed and closed out.

How this helps us to assess effectiveness

Engaging with suppliers and other business partners provides us with feedback on where our approach is working and where we have opportunities to improve.

CONSULTATION PROCESS

Consultation process

The development of this Statement was led by Group Sustainability with input from various functions across the reporting entities including Corporate Affairs, Group Finance, Risk, Global Supply Chain and Manufacturing, Operations, Procurement, P&C, Legal, International Sourcing, Research and Development, Quality and HWSE. This consultation occurred through the Modern Slavery Statement Working Group along with direct engagement with various teams. The consultation process also involved input from the CMT and other senior leaders and employees across our owned or controlled entities and our business units including Global Rice, CopRice, Trukai and Riviana (which is also a reporting entity).

The ongoing development of our Modern Slavery Statement, and our modern slavery risk management approach, includes cross-functional consultation with input from key areas of our business. We understand that actively engaging with our people, regardless of their roles, builds internal alignment and is a fundamental component in developing robust programs and procedures.

Prior to being put to the SunRice Board for consideration and approval, this Statement was reviewed and approved by the CMT. The CMT comprises executives from across SunRice Group who have specific operational and functional responsibility for the reporting entities, controlled entities and business units, including Global Rice, CopRice, Trukai and Riviana. In addition, the Statement was reviewed by the SunRice Board’s SHS Committee before it was approved by the Board.



Regulatory disclosure matrix

This Statement was prepared to meet our regulatory disclosure requirements and complements our existing sustainability disclosure found on SunRice Group's investor website and Annual Reports. This Statement is made in accordance with the *Australian Modern Slavery Act 2018 (Cth)* and with regard to the requirements of the *UK Modern Slavery Act (2015)*.

The tables below reference where within this Statement we address the mandatory criteria for the *Australian Modern Slavery Act 2018 (Cth)* and the requirements under the *UK Modern Slavery Act 2015*.

SunRice's response to the *California Transparency in Supply Chains Act* is available [here](#).

Australian Modern Slavery Act Mandatory criteria

UK Modern Slavery Act Recommended reporting criteria

Disclosure reference

Mandatory criteria 1:

Identify the reporting entity.

About this Statement (page 2)

Mandatory criteria 2:

Describe the structure, operations and supply chains of the reporting entity.

Organisation's structure, its business and its supply chains.

Our structure, operations and supply chain (page 6)

Mandatory criteria 3:

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls.

Parts of its business and supply chains where there is a risk of slavery and human trafficking taking place and the steps it has taken to assess and manage that risk.

Identifying and understanding our modern slavery risks (page 11)

Mandatory criteria 4:

Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.

Policies in relation to slavery and human trafficking. Due diligence processes in relation to slavery and human trafficking in its business and supply chains. Training on slavery and human trafficking available to staff.

Assessing and addressing our modern slavery risks (page 15)
Grievance mechanisms and remediation (page 25)

Mandatory criteria 5:

Describe how the reporting entity assesses the effectiveness of such actions.

Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.

Assessing the effectiveness of our approach (page 27)

Mandatory criteria 6:

Describe the process of consultation with any entities that the reporting entity owns or controls.

Consultation process (page 28)

Mandatory criteria 7:

Any other information that the reporting entity considers relevant.

Appendix 1: Our brands (page 30)

Appendix 2: Our owned or controlled entities (page 31)



Appendix 1: Our major brands



KOSHIHIKARI



Appendix 2: Our owned or controlled entities

Name of entity ²⁰	Country of Incorporation	Principal activities	SunRice Group interest in the entity in FY2025 (%)
Ricegrowers Limited	Australia	Ultimate parent entity	-
Riviana Foods Pty Ltd²¹	Australia	Importation / manufacturing / distribution of food products	100
Australian Grain Storage Pty Ltd	Australia	Grain storage assets	100
Rice Research Australia Pty Ltd	Australia	Research into rice growing	100
Roza's Gourmet Pty Ltd	Australia	Manufacturing / distribution of food products	100
KJ&Co Brands Pty Ltd	Australia	Importation / distribution of food products	100
SunRice Australia Pty Ltd	Australia	No current activities	100
SunRice Fund Limited	Australia	No current activities	100
SunRice Trading Pty Ltd	Australia	No current activities	100
Pryde's Tucker Bag Pty Ltd	Australia	Holding company	100
Pryde's Easifeed Pty Ltd	Australia	Manufacturing / distribution of animal food products	100
Pryde's Easifeed NZ Limited	New Zealand	Distribution of animal food products	100
Ricegrowers New Zealand Ltd	New Zealand	Distribution of rice and other food and animal nutrition products	100
Aqaba Processing Company Ltd	Jordan	Rice packing / storage	80
Rice Industries Limited	PNG	Property	66.23
Trukai (Wholesale) Limited	PNG	Distribution of rice	66.23
Trukai Industries Limited	PNG	Processing and distribution of rice	66.23
Ricegrowers Singapore Pte Ltd	Singapore	Procurement and trading of rice and other food products	100
Ricegrowers Limited Japan	Japan	No current activities	99
Solomons Rice Company Limited	Solomon Islands	Distribution of rice	100
Ricegrowers Middle East DMCC	UAE	Distribution of rice and other food products	100
SunFoods LLC	US	Processing and distribution of rice	100
Sunshine Rice, Inc	US	Holding company	100
Sunshine Rice Pty Ltd	Australia activities	No current	100
Ricegrowers Vietnam Company Limited	Vietnam	Processing and distribution of rice	100
SunRice Trading (Shanghai) Co Ltd	China	No current activities	100
SavourLife Pty Ltd	Australia	Manufacturing / distribution of animal food products	100
SavourLife IP Pty Ltd	Australia	Trustee of SavourLife Foundation	100

20. The line items in bold are reporting entities under the Act.

21. Entities part of a Deed of Cross Guarantee that are relieved under the ASIC Corporations (Wholly-owned Companies) Instrument 2016/785 from preparing a separate financial report (see note 5c) of the Annual Report.