

Prepared by  
**JACOB JOHN**  
HR & WHS MANAGER



# Modern Slavery Statement

Year 2024–2025

Ethical sourcing report for a  
Sustainable Growth and Success



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# Table of Contents

**MESSAGE FROM CEO**

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**STATEMENT ON REPORTING ENTITY**

---

**STRUCTURE, OPERATIONS AND  
SUPPLY CHAIN**

---

**RISKS OF MODERN SLAVERY  
PRACTICES**

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**MODERN SLAVERY RISKS, DUE  
DILIGENCE AND REMEDIATION**

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**TRAINING**

---

**CONSULTATION**

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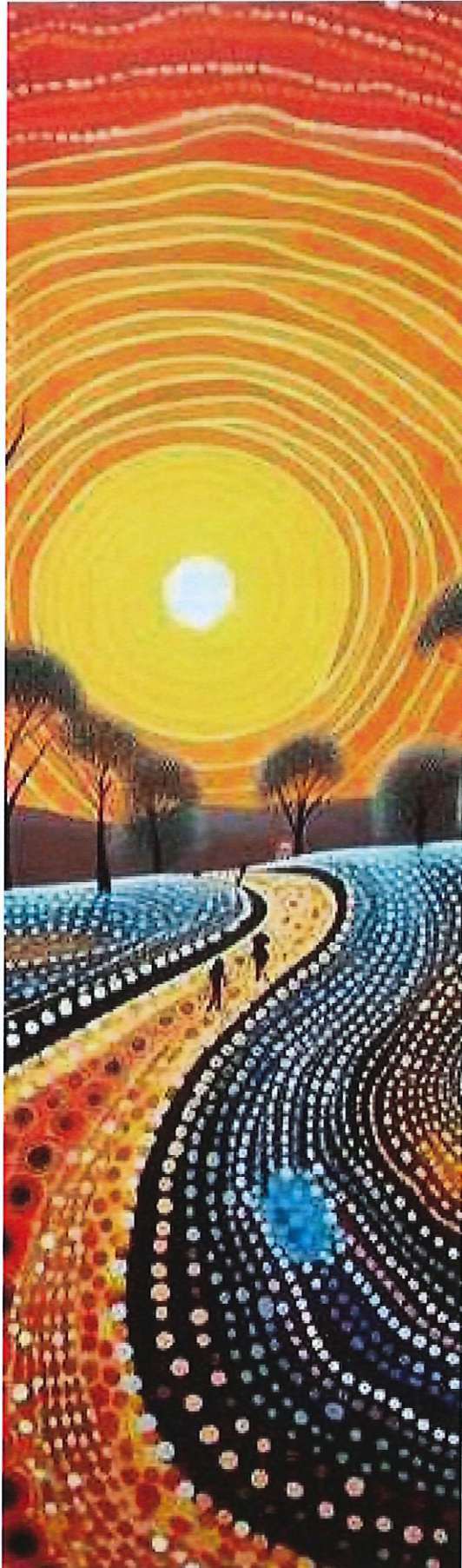
**ADDITIONAL INFORMATION**

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**LOOKING AHEAD**

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OZ Group Co-Op Ltd acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea, and community. We pay our respects to the elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.



# Message from CEO



Oz Group Co-Op Ltd (Oz Group) is committed to conducting business honestly, ethically and responsibly. Oz Group's Modern Slavery Statement for FY24-25, reflects our continued commitment to conducting business with integrity, upholding human rights, and addressing modern slavery risks across our operations and supply chain.

As part of the horticulture industry, we are aware of the potential risks of modern slavery entering our supply chain. In alignment with our human rights policy, we remain dedicated to employing workers who have freely consented to their roles, are of legal age, and meet all legal status requirements. We also prioritize partnerships with suppliers and contractors who share this commitment.

This year, we focused our efforts on mitigating modern slavery risks in areas with significant purchasing expenditures and where we are most at risk of contributing to such practices. We continue to work closely with our suppliers to ensure compliance with regulatory requirements and to uphold our shared values regarding human rights.

Oz Group recognizes that addressing modern slavery requires ongoing effort and collaboration. We remain committed to continuous improvement and collective action to mitigate these risks effectively.

**James Kellaway**  
Chief Executive Officer



[www.ozgroupcoop.com.au](http://www.ozgroupcoop.com.au)

## STATEMENT ON THE REPORTING ENTITY

Oz Group Co-Op Ltd (Oz Group) ABN 73482255177, has prepared this Modern Slavery statement under the Australian Commonwealth Modern Slavery Act 2018 (Cth) (the Modern Slavery Act)

This Statement describes the steps undertaken by Oz Group to assess and address the risks of modern slavery in our operations and supply chain for the financial year dated 1 July 2024 – 30 June 2025 (FY24) (the Reporting Period), and our future commitment to move beyond evaluating our strategy on modern slavery risks, to initiating actions that embody our strategy and foundations.

This Modern Slavery Statement was approved by the Board of Directors, Oz Group Co-op Ltd on 30-06-2025

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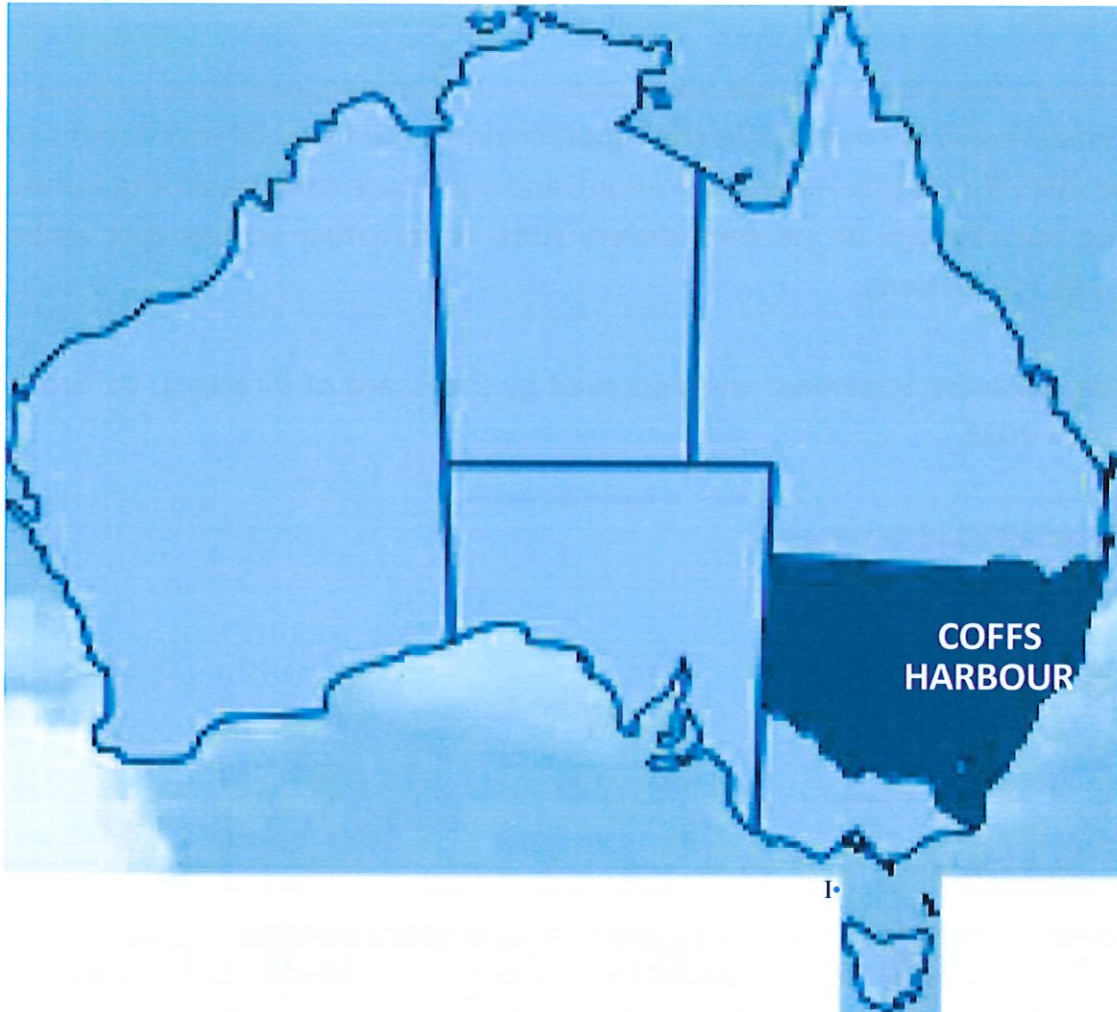
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ABN 73482255177



## WHERE WE OPERATE



## STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Oz Group Co-op Limited is proud to be a 100% farmer-owned co-operative, dedicated to delivering the finest quality berry fruits and products. Established in 2001 on the Coffs Coast as an alternative to banana production, we have grown to support approximately 150 grower members, ensuring sustainable farming practices and premium produce.

Our core operations include the receipt, grading, packing, and dispatching of blueberries, raspberries, blackberries, and berry-based food products to local, national, and international markets. Partnering with Driscoll’s Inc, we also supply fresh berries to the Australian region through Driscoll’s Australia Pty Ltd.

With a strong commitment to sustainability, our growers are located from Macksville to Grafton, NSW, and along the coastline to the Great Dividing Range. Managed by a Board of Directors elected by its members, Oz Group remains focused on adding value to our members and delivering fresh, high-quality berries.

### At a Glance

Our Business	Revenue (FY23-24)	\$258.8 mil
	Products	Fresh: Blueberry, Raspberry & Blackberry
	Employee Headcount	46 Full time Permanent 206 casuals
	Employee countries (nationalities)	41 nationalities
Grower’s Operations	Total Farming Footprint	1124 hectares
	Total Number of Plants	3608000
	Different Plant Varieties	34
Our Business Operations	Number of Operations	4 – Receiving, grading, Packing & dispatching
	Direct and indirect purchasing spend	\$18.759 mil
Supply Chain	Suppliers	249 suppliers
	Supplier countries	Australia



## STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### Operations

The operations at Oz Group continue to thrive, with our centralized packhouse in Coffs Harbour playing a pivotal role in receiving, grading, packing, and dispatching berry fruits to major supermarkets and markets across Australia. In 2020, we introduced a frozen blueberry line to complement the fresh supply, which has helped us minimize waste and create additional employment opportunities for local workers.

Our dedicated teams, divided into Agronomy, Operations, Maintenance, Finance, Co-op Services, HR, and WHS Compliance, support our growers, allowing them to focus on producing quality fruit. Most of our workforce operates in the packhouse and operations teams, while others contribute through receivables, maintenance, transport, and administration roles.



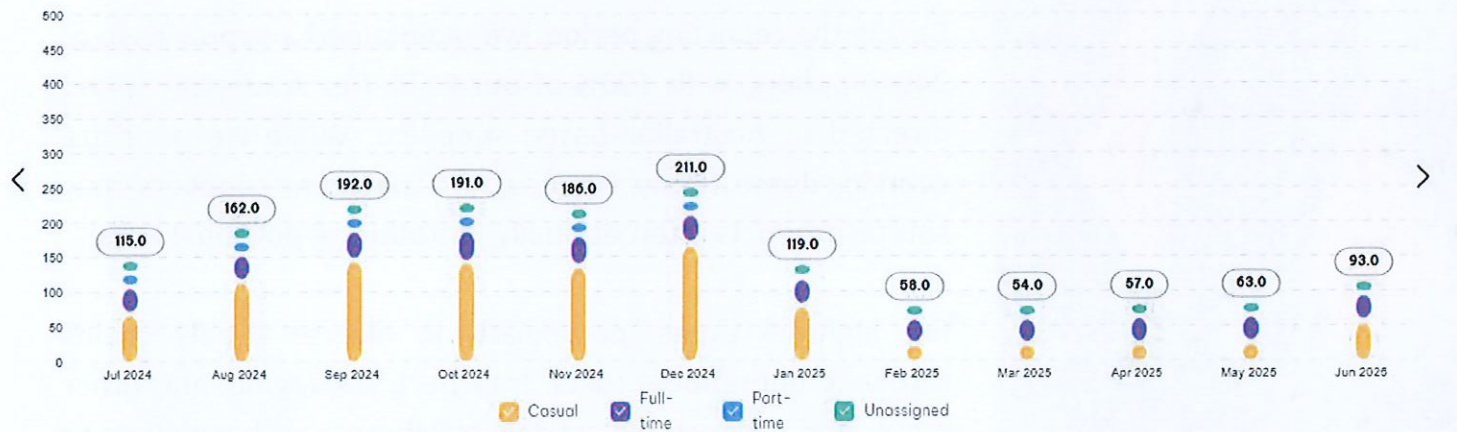
# STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## Employees

The seasonal nature of the Oz Group business means our workforce adapts throughout the year to meet demand. In FY24-25, we proudly employed 211 individuals from 41 nationalities, consisting of 42 permanent staff and 169 casual workers under the Horticulture Award MA000028 and Common Law contract.

Our Safe for Life promise underscores our commitment to the health, safety, and wellbeing of everyone working with us. This is reflected in our Health, Safety and Wellbeing Policy and supported by a robust framework and strategy to uphold this promise. We actively foster constructive relationships with employees and all stakeholders.

### Headcount



Note: Employees who are represented as Unassigned are missing an employment type in their employment history or do not have an active employment type as of the date specified.



## Supply Chain

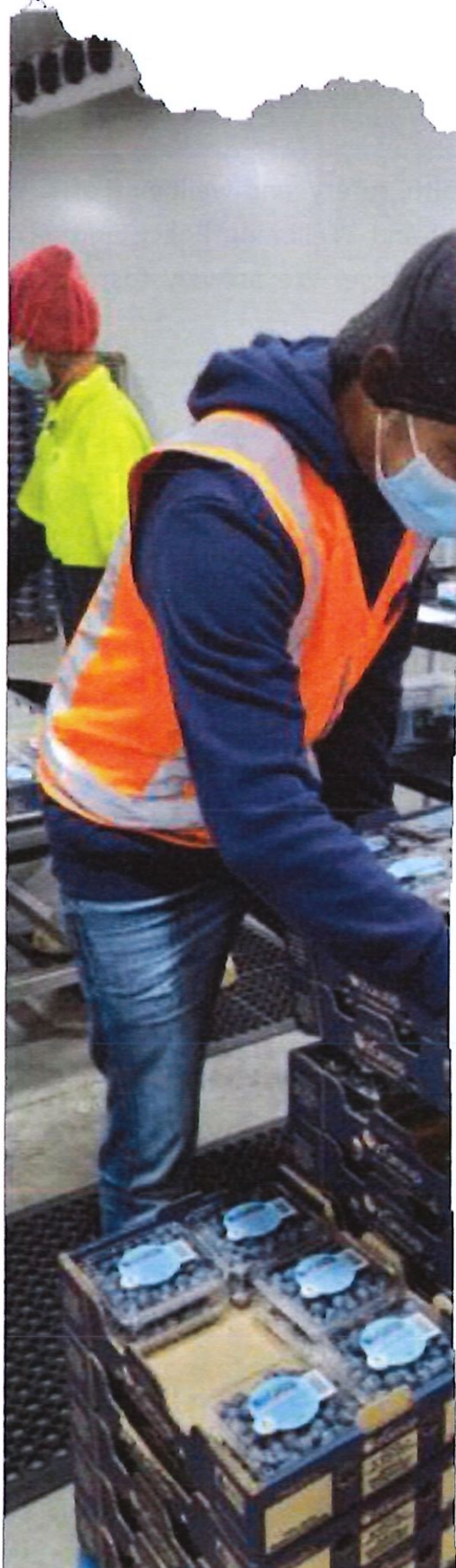
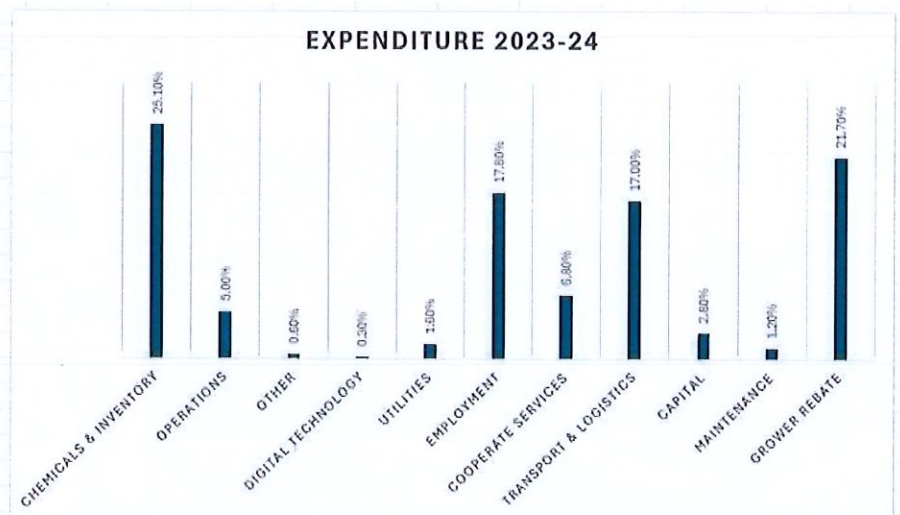
We are committed to ensuring ethical practices across our supply chains and addressing modern slavery risks in the goods and services we procure. To streamline our operations and enhance our monitoring efforts, we have categorized our suppliers into two groups:

- **Packhouse Supply Chain:** Supporting the core functions of our business.
- **Grower Member Supply Chain:** Providing goods or services directly to our growers.

### Packhouse Supply Chain

During the reporting period, we maintained a supply base of 249 suppliers, with 100% of our FY24 Tier 1 supplier spend directed to Australian-based suppliers. While we prioritize sourcing domestically, we recognize that some suppliers may source products internationally, introducing potential risks.

For high-risk areas, particularly in diverse supply chains involving operational costs, transport, packaging, and other goods and services, we actively collaborate with suppliers to mitigate modern slavery risks. This approach ensures responsible sourcing and aligns with our business objectives.



## STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### Grower Member Supply Chain:

Being a co-operative, Oz Group farmer-members are at the heart of the organization. Our farmers are our focus and their progress is central to our success. Growers are separate entities who operate independently of one another. They are members of Oz Group and are provided with the benefits of a co-operative structure.

For our grower members, key operational expenses include:

1. Labour and packing fees
2. Fertilizers and chemicals
3. Plants, materials, and other operating costs



## RISKS OF MODERN SLAVERY PRACTICES

Given number of stakeholders operating across our supply chain, Oz Group recognizes there is potential across this complex and dynamic environment for slavery and human trafficking to occur. The 2023 Global Slavery Index estimates that on any given day in 2021, there were 41,000 individuals living in modern slavery in Australia. This equates to a prevalence of 1.6 people in modern slavery for every thousand people in the country. Within Asia and the Pacific, Australia is ranked 26 out of 27 countries in terms of prevalence of modern slavery, and 149 out of 160 countries globally.

The report identified Australian agriculture as one of the industries at high risk for cases of forced labour to occur. Horticulture industry have high inherent risk due to:

1. Linguistically diverse workforce
2. Casual workforce
3. Engaging Labour Hire contractors especially where there is no requirement to be licenced by the State Government.
4. Time pressures in harvest and inconsistency in weather change

In horticulture, the types of slavery identified as being most likely are forced labour, debt bondage and deceptive recruiting for labour or services. These types of slavery have been identified because the horticultural sector has a high reliance on migrant workers, many of whom have limited understanding of English and who may be less aware of their human rights.

They are primarily undertaking seasonal tasks (ie. picking and packing work) and are often employed under temporary or casual employment arrangements in regional and remote locations. Workers may be on temporary visas, with some of these visa categories binding an employee to a specific employer for the duration of their stay in Australia.



### Operations

The Oz Group remains committed to upholding the rights of all our employees and maintaining a workplace free from modern slavery risks. Our systems, policies, and procedures are designed to protect our workforce and ensure compliance with ethical standards.

In our operations, we continue to assess the risk of modern slavery as relatively low due to the controls we have implemented:

- A dedicated HR and Ethical Sourcing team actively monitors compliance.
- A centralized payroll system ensures accurate tracking of work hours and deductions.
- Employment contracts cover 100% of our direct hire staff, with labor hire contracts in place for the remainder.

These measures reflect our ongoing efforts to safeguard our employees and uphold ethical practices. To maintain the highest standards in our engagement with seasonal workers under the PALM scheme and through our labour hire providers, we have implemented robust controls and due diligence processes. These measures are critical to mitigating risks and ensuring compliance with statutory requirements.

Key controls in place include:

- Retaining the same team members as seasonal workers each year to ensure consistency and reliability.
- Conducting thorough reviews of all documentation to meet statutory obligations.
- Processing payroll internally using timesheets for seasonal workers and coordinating with the labour hire company to ensure accurate wage payments.
- Receiving copies of payslips for all seasonal workers weekly from the labour hire provider for verification.
- Providing every employee access to the STOPLINE number, a third-party whistleblower hotline, to report any concerns confidentially.



## Supply Chain

## RISKS OF MODERN SLAVERY PRACTICES

We continue to assess our modern slavery risks across our supply chain, recognizing that our risk profile evolves over time. This includes conducting due diligence on new suppliers and periodically reviewing existing ones to ensure compliance and ethical standards are upheld.

We review our current operations and supply chains to identify any potential risks or gaps. This proactive approach will not only ensure compliance but also reinforce our dedication to ethical business practices.

We have identified certain key areas in our supply chain where there is considered to be heightened risk of modern slavery

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Oz Group sources fresh berries from its grower member's farms which may present a higher risk of modern slavery. The internal risk assessment indicated that the types of slavery involved within the grower member supply chain are forced labour, debt bondage and deceptive recruiting for labour or services.

Our growers are classified as Tire 1 - Organics, Tire 2 - Rubbs - Growing Blackberry, Raspberry and Blueberry) and Tire 3 - Blueberry grower. All our grower members were registered with Fair Farm in 2021. Its mandate for our Rubbs growers to undertake third-party social compliance audit and certified either by SEDEX or Fair Farm.

## Our Member growers

- In FY21, we successfully completed training for all growers on social compliance and ethical sourcing.
  - - In FY22, we provided the Fair Farm Manual and mandatory policies and procedures to all grower members.
  - - In FY23, we distributed notice boards containing ethical sourcing and WHS posters, Fair Work documents, and the third-party helpline number for whistleblowing.
  - For FY24, we mandated that all growers engaging Labour Hire suppliers for the season submit copies of their Labour Hire agreements to Oz Group. August 2024, 100% growers have complied with this requirement. Oz Group now maintains detailed records of Labour Hire suppliers and ensures regular communication with growers regarding accessory liability and due diligence.
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FY2024 we engaged Labour Hire company to hire seasonal workers under PALM program. To maintain the highest standards in our engagement with seasonal workers under the PALM scheme and through our labour hire providers, we have implemented robust controls and due diligence processes. These measures are critical to mitigating risks and ensuring compliance with statutory requirements.

## Labour Hire

Key controls in place include:

- Retaining the same team members as seasonal workers each year to ensure consistency and reliability.
- Conducting thorough reviews of all documentation to meet statutory obligations.
- Processing payroll internally using timesheets for seasonal workers and coordinating with the labour hire company to ensure accurate wage payments.
- Receiving copies of payslips for all seasonal workers weekly from the labour hire provider for verification.
- Providing every employee access to the STOPLINE number, a third-party whistleblower hotline, to report any concerns confidentially.

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During the reporting period, we maintained a supply base of 249 suppliers, with 100% of our FY24 Tier 1 supplier spend directed to Australian-based suppliers. While we prioritize sourcing domestically, we recognize that some suppliers may source products internationally, introducing potential risks.

## Suppliers

We are focused on mitigating the risks of modern slavery within our supply chain. While our operations, products, and services are predominantly sourced from Australian-based companies, we recognize that their supply chains may extend internationally.

In instances where international sourcing is identified as high-risk, we actively collaborate with suppliers to address and reduce these risks.

This involves:

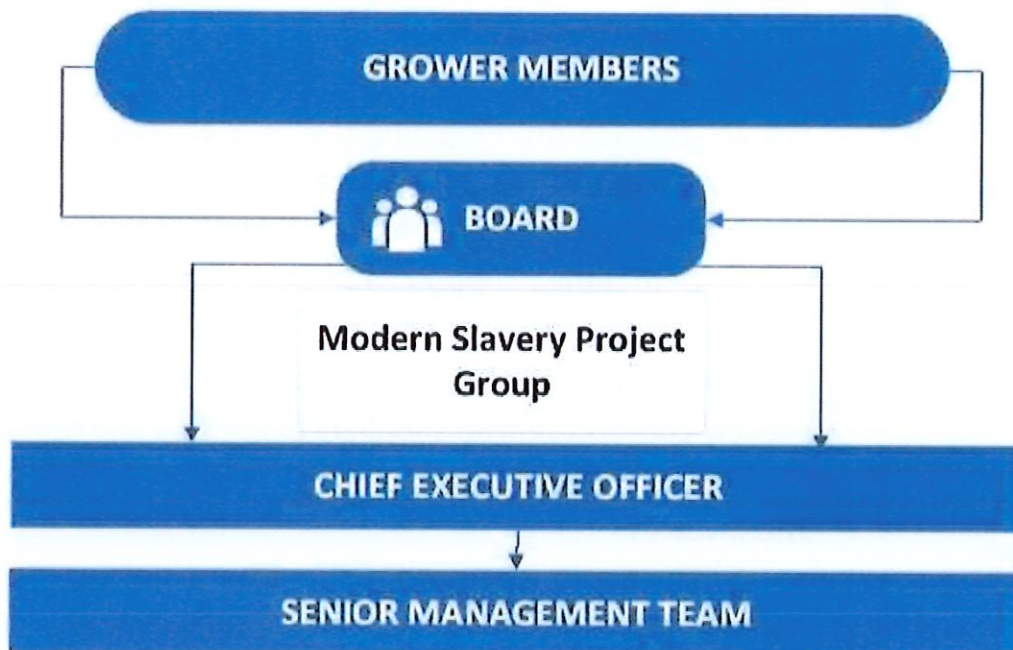
- Conducting due diligence on supplier practices.
- Engaging in open dialogue with suppliers to ensure compliance with ethical standards.
- Monitoring and reviewing supply chain processes regularly to identify potential vulnerabilities.

## MODERN SLAVERY RISKS- DUE DILIGENCE AND REMEDIATION

The Oz Group is committed to upholding the highest standards in human rights across our operations and supply chain. As a co-operative dedicated to serving the interests of our grower members, it is essential that we remain vigilant in addressing human rights-related risks, including modern slavery.

Our Board of Directors oversees these critical issues, with the Modern Slavery Project Group actively managing related risks. This group, comprising representatives from operations, human resources, and compliance, assesses our current activities and provides actionable recommendations to the Board. Additionally, our Chief Executive Officer, supported by the Senior Leadership Team, ensures the effective implementation of our human rights programs.

The Working Group continues to play a vital role in addressing modern slavery by providing recommendations on policies and processes while assisting with the implementation of necessary actions.



The 2024 targets set by Oz Group to mitigate human rights and modern slavery risks in our operations and supply chain have been a pivotal focus this year. Our progress and results against these targets are outlined in the table below:

Description	Target	Results
<p>Oz Group mandate all active growers engaging labour hire services to provide the details of labour hire suppliers and copies of Labour Hire Agreements.</p>	<p>Completion by end of August 2024</p>	<p>Completed. 100% growers who had engaged labour hire for the season FY2024 provided the details and copies of Labour Hire Agreement.</p>
<p>Oz Group to maintain the database of all LHP that supplies workforce to its grower members. Check on LHP's ABN and Licence.</p>	<p>Completion by end of September 2024</p>	<p>Completed.</p>
<p>Oz Group mandate all active grower's workforce to have access to Ethical sourcing and WHS policies and procedures. Be aware of their work rights and entitlement. Have free access to third party Stop line number.</p>	<p>Oz Group to supply its active growers with notice boards with all policies and procedures, work right and entitlement information, Whistleblowing number displayed.</p> <p>Oz Group mandate all its active growers to display the notice boards at their farms and all its workforce to have free access to information.</p> <p>Growers to send photos of their displayed notice boards with ethical sourcing</p>	<p>information as evidence of compliance to Oz group</p>

Target achieved by Nov 2024.

Description	Target	Results
Oz Group assists all its Non-Driscoll’s Rubus growers to complete their Fair Farm Audit.	Process on going. Two audit completed with one scoring 0 points (re-certification after three years) and the other with 8 points (Recertification after 2 years)	On going

## MODERN SLAVERY RISKS- DUE DILIGENCE AND REMEDIATION

The Oz Group Modern Slavery Working Group, established in 2021, continues to ensure a coordinated and collaborative approach to addressing modern slavery and respecting human rights across our operations. The purpose of the Working Group is to review and provide strategic direction on our modern slavery response, offering advice and recommendations on policies, processes, and actions required to combat this critical issue. The group also supports Oz Group in delivering a meaningful and impactful response to modern slavery.

Comprised of cross-functional experts in ethical sourcing, human resources, procurement, and operations, the Working Group ensures a skills-based, targeted approach. The expertise of our members is regularly reviewed to align with the evolving challenges and vulnerabilities within our business. The Working Group periodically reports progress and strategies to the Executive team, ensuring transparency and accountability in our efforts.



## Policy Framework

Human Rights Policy	To maintain the highest standards of professionalism and integrity, we have outlined our expectations regarding the conduct of both our employees and suppliers. This framework is essential to ensure consistency, mutual respect, and adherence to our organizational values.
Whistleblowing Policy	We have established an independently operated whistleblower hotline, available to all workers in Oz Group, on our grower farms, including labor hire workers, and other stakeholders. This service ensures confidentiality and provides a secure platform for reporting concerns without fear of retaliation. We encourage anyone who becomes aware of illegal or unethical behavior involving Oz group, its employees, or its grower member workforce to come forward and raise their concerns.
Recruitment and Selection Policy	Our commitment to fair, equitable, and non-discriminatory recruitment and selection practices is paramount. This includes ensuring all candidates meet eligibility requirements to work in Australia and strictly adhering to child labour laws.
Code of conduct	The values, commitments, and ethical standards of our Company form the foundation of how we operate and interact with clients, colleagues, and stakeholders. This policy outlines the standards of conduct expected from everyone within our organization.
Grievance Policy	This policy outlines the essential steps to address personal workplace grievances such as discrimination, harassment, or bullying.

### Anti- Bribery and corruption policy

The integrity of Oz Group lies at the heart of our success, and our commitment to lawful and ethical behavior remains unwavering. This policy emphasizes the importance of our Code of Conduct and Whistleblower Policy. These guidelines are designed to not only ensure compliance with laws and regulations but also to foster a culture of transparency, accountability, and respect within our organization.

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### Supplier Code of conduct

Oz Group is committed to maintaining the highest standards of integrity and accountability in our operations. To align with this commitment, we expect all suppliers to adhere to the Supplier Code of Conduct. This includes taking full responsibility for compliance and implementing the necessary tools, record-keeping, and management systems to support this adherence.



## Due Diligence

Oz Group is deeply committed to ensuring that human rights are respected and protected throughout our operations, including within our supply chain. This commitment is reflected in our Supplier Code of Conduct, which outlines the standards and principles we expect all our suppliers to uphold.

The Code covers critical areas such as:

- Human rights and the prevention of modern slavery
- Health and safety, including safe working conditions and fair wages
- Compliance with immigration laws
- Promoting diversity and inclusion

As part of our onboarding process, all domestic suppliers in Australia are provided with a copy of the Supplier Code of Conduct, which is incorporated into our Supply Agreements. Additionally, Oz Group has set a target to ensure 100% of high-risk suppliers, as identified by spend and have implemented their own Modern Slavery Statements and policies.

We value integrity and honesty in our business relationships and seek to collaborate with partners who share our principles. Compliance with the Supplier Code of Conduct is a fundamental aspect of our supplier relationships.

## Grievance mechanisms

Oz Group is committed to maintaining a safe and ethical workplace. To support this, we provide grievance mechanisms aligned with our Whistleblower Policy, applicable to all Oz Group operations, including growers and their labour hire contractors.

We encourage everyone to voice their concerns regarding improper conduct, unlawful, or unethical behaviour without fear of retribution. To ensure confidentiality and independence, we have partnered with Stoptline, a third-party whistleblower service.



## Training

Oz Group remains steadfast in its commitment to addressing human rights and modern slavery risks within our operations and supply chain. We are pleased to share the progress we made in FY22 and our plans for the upcoming year.

In FY22, we ensured that:

- All permanent staff completed modern slavery awareness training through our online learning platform, GO1.
- The Board of Directors and Senior Management Team (SMT) received specialized training from Pillar-Two on human rights and modern slavery risks in horticulture.
- NS8 Lawyers and Advisors provided additional training on directors' duties and responsibilities related to modern slavery.
- Over 40 growers participated in face-to-face training sessions covering workplace relations, health and safety, and employment law, conducted by our qualified internal staff.

Looking ahead to FY25-26, we aim to further enhance awareness among our staff and grower members through continued training initiatives on human rights and modern slavery issues. All Oz Group sites will display whistleblower posters. Whistleblower toolbox talks will be made available to all sites to ensure everyone is aware of our Whistleblower Policy and Procedure and know when to raise concerns of suspected or actual misconduct

## Consultation

Oz Group has taken a significant step forward in addressing the risks of modern slavery across our operations. In collaboration with the Modern Slavery Working Group, which includes representatives from Human Resources & Ethical Sourcing, Operations and Finance we have developed a comprehensive approach to manage and mitigate these risks.

This statement has been carefully reviewed by our Modern Slavery Working Group to ensure it reflects our commitment and actions. Through our Ethical Sourcing Program, the Working Group has worked closely with operational categories to identify and address specific labour risks. This collaborative effort demonstrates our dedication to ethical practices and safeguarding the rights of those within our supply chain.

## Looking Ahead

In 2024, we have continued to prioritize our response to modern slavery risks across both our Australian and international operations. Recognizing the importance of constant improvement, we undertook an external review of our Modern Slavery response. This review not only highlighted the progress we’ve made but also identified key areas for focus in 2025.

Throughout the year, we have worked on enhancing awareness and understanding, particularly given the challenges of managing a large number of seasonal employees. This remains a vital area of ongoing activity. Additionally, our ethical sourcing team has provided us with a robust framework for monitoring compliance and ensuring we uphold the rights of all workers within our operations and supply chain.

As we move into 2025, our updated targets, building on our existing Action Plan, will help us maintain momentum and continue assessing the effectiveness of our actions. These targets are outlined on the following page for your reference.

## Action Plan

Oz Group has implemented a 2025 Action Plan, which details Oz Group’s continuous improvement approach to modern slavery, including measurable outcomes and deadlines.

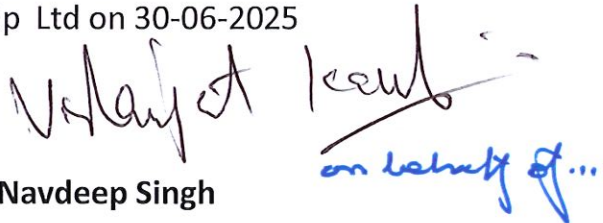
Description	Target 2025	Results
Modern Slavery Training for people in key roles	Board of Directors, CEO and all SLT to complete Advanced Awareness training in Modern Slavery by 30th June 2025	On going
Complete Fair Farm Re-certification Audit in 2025	Oz Group will have internal audit for Fair Farm in April 2025 and complete all corrective action if any. Fair Farm Re-certification audit is scheduled for June 2025	On going

Description	Target 2025	Results
<p>Mandate all its active grower members to re-new their Fair farm registration. Encourage and assist top 20 growers (by supply) to complete their Fair Farm Audit.</p>	<p>All active growers will have to re new their Fair Farm Registration before the new season starts. Provide all support to growers who volunteer in completing the Fair Farm Audit in 2025</p>	<p>On going</p>
<p>Oz Group will mandate all active growers engaging labour hire services to provide the details of labour hire suppliers and copies of Labour Hire Agreements. Internal audit will be conducted on random basis within the grower supply chain.</p>	<p>All active growers to provide their LHP details and copies of Labour Hire agreement before the start of the business.</p>	<p>On going</p>
<p>Oz Group's ethical sourcing team will visit all its grower member farm to ensure all workforce has free access to Ethical sourcing (Work right, entitlements) and WHS information at workplace and additionally have free access to whistle blowing number.</p>	<p>Visit to all farms will be scheduled in 2025 and ensure compliance.</p>	<p>On going</p>
<p>All major suppliers (spend over 1 million dollars) to provide its supplier code of conduct.</p>	<p>Mandate all major suppliers to Oz Group (spend over 1 million dollars) to provide its supplier code of conduct in 2025</p>	<p>On going</p>

## STATEMENT APPROVAL

This Statement was approved by the Board of Oz Group Co-Op Ltd on 30-06-2025

  
James Kellaway  
Chief Executive Officer

  
Navdeep Singh  
Chairman – Board of Directors

