

2024

MODERN SLAVERY STATEMENT



Fresh
Produce
Group



TABLE OF CONTENTS

- 03** Statement Summary
 - Reporting Entities
 - Introduction
- 05** Structure, Supply Chain and Logistics
 - Locations Across Australia
 - Operations
 - Supply Chain
 - Employees
- 08** Assessing the Risks
 - Risk in our Operations
 - Risk in our Supply Chain
- 10** Addressing the Risks
 - Internal Policy Framework
 - Labour Practices Due Dilligence
 - PALM Scheme
 - Monitoring Labour Hire
 - Monitoring Suppliers
 - Increasing Awareness
- 16** Assessing Effectiveness
- 17** Statement Approval



REPORTING ENTITIES

This Statement applies to:

- Fresh Produce Group of Australia (ABN 87 055 359 601),
- Fresh Produce Group Western Australia (ABN 81 152 973 932),
- Treviso Farm Management (ABN 31 144 899 276),
- Tumut Grove Farm Management Pty Ltd (ABN 46 619 756 115),
- Smart Berries Pty Ltd (ABN 39 164 122 945),
- Smart Berries Mundubbera (ABN 30 164 124 903),
- SB Tasmania Pty Ltd (ABN 25 605 860 017),
- Fruitico Pty Ltd (ABN 49 608 313 604),
- Fruitico Farms Pty Ltd (ABN 51 608 318 921),
- Kimberley Table Grapes Pty Ltd (ABN 17 635 953 187), and
- Kimberley Asparagus Pty Ltd (ABN 69 609 891 287).

Collectively these entities are referred to in this statement as 'Fresh Produce Group', 'FPG' or 'The Company'.

The above entities are managed collectively under the same policies procedures and guidelines and, as such, we have decided to provide a joint statement. FPG has a collective approach to managing and mitigating the risks of modern slavery across the group. This statement is submitted on behalf of and prepared in consultation with all of the related entities named above and has been approved by the FPG Management Board.

INTRODUCTION

This is Fresh Produce Group's fifth Modern Slavery Statement and it has been published in accordance with the Modern Slavery Act 2018 (Cth) covering the financial year from 1 July 2023 to 30 June 2024.

As one of Australia's largest and most innovative produce suppliers, Fresh Produce Group is committed to identify, eliminate and prevent modern slavery in our operations and supply chain.

Our farms and growers in Australia and around the world provide our domestic and international customers with quality fresh produce. The business comprises of growing, packing, exporting, importing, wholesale, pre-packing, ripening, logistics and marketing of produce.

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. This statement summarises our assessment of modern slavery risks in our operations and supply chain, and outlines our ongoing actions to address these risks and protect human rights.



LOCATIONS ACROSS AUSTRALIA



NEW SOUTH WALES

Corporate Office, Warehouse and Wholesale Stand
Sydney Markets, Flemington



VICTORIA

Table Grape Farms and Packing Shed
Red Cliffs

Citrus Farms and Packing Shed
Colignan



QUEENSLAND

Office and Warehouse
Brisbane Markets, Rocklea

Berry Farm
Perseverance Dam

Berry Farm
Mundubbera



WESTERN AUSTRALIA

Grape Farm and Packing Shed
Meelon

Grape Farm
Hamel

Grape Farm
Broome

Asparagus Farm and Packing Shed
Broome



TASMANIA

Berry Farm and Packing Shed
Forth



OPERATIONS

Fresh Produce Group is a leading supplier of fresh produce to major Australian supermarket chains and independent retailers. To meet the demand of our customers and consumers, we source produce from various channels, including our own farms, domestic growers, and international growers and shippers. We distribute produce across Australia and export to international customers.

We are committed to providing the highest quality and freshest produce. We utilise our extensive network of international buyers, growers, packers, freight forwarders, and distribution hubs to specialise in counter-seasonal supply. This allows us to provide our customers and consumers with access to their favourite fresh produce year-round.

We have always sought out the finest growing areas, optimal conditions, and dedicated farmers. When we identify ideal conditions, we invest in these areas. As a result, we have 12 farms with over 1,200 planted hectares of farmland across Australia. Our farmers are constantly innovating by introducing new varieties, packaging and pre-packaging innovations, and improving our supply chain.

To support our operations throughout Australia, we have two purpose-built distribution centres and five state-of-the-art on-site packing facilities with cold storage. We continuously invest in upgrading our systems and packing sheds across our farms to facilitate faster and more efficient processes. This includes growing, harvesting, packing, handling, cold storage, and dispatch.



In addition to our own operations, we extend our expertise in supply chain management, logistics, and customer reach to benefit other Australian and international produce companies. Our facilities and knowledge enable us to provide tailored solutions to meet the unique needs of our suppliers and customers.

Fresh Produce Group also operate a wholesale stand at the Sydney Markets, where we foster close relationships with independent retailers. This allows us to gain valuable market insights into the evolving tastes and demands of consumers. Such insights play a vital role in enhancing our service to customers both locally and internationally.

SUPPLY CHAIN

Our produce is sourced through direct and indirect relationships with domestic and international growers. We outsource the following services used across our supply chain:

- logistics,
- transport,
- distribution,
- labour, and
- information technology.

In the 2023/24 financial year we partnered with approximately 1000 trade and non-trade suppliers. Our largest traded commodity was fresh table grapes.

Maintaining strong relationships with suppliers is critical to the longevity of our business. We communicate to them all legal and customer requirements in Australia and overseas.

Fresh Produce Group values strong relationships with long term suppliers and customers, both domestically and internationally.

EMPLOYEES

Fresh Produce Group employs approximately 600 full time, part time and casual employees in our core labour force around Australia. With the seasonal demands of our business our workforce increases and can include an additional 1200 seasonal employees per year across our farms and distribution centres.

Our workforce includes seasonal workers directly employed through the Australian Government Pacific Australia Labour Mobility (PALM) Scheme. Across our farms we employ over 300 seasonal workers from the Pacific Islands and Timor-Leste.



ASSESSING THE RISKS

Fresh Produce Group has undertaken a comprehensive risk assessment of our operations and supply chain to identify any potential risks associated with modern slavery practices. Each year when we produce a statement we review our risks and conduct a new assessment to ensure that our approach is still current.

RISK IN OUR OPERATIONS

Fresh Produce Group has policies and procedures in place to safeguard the rights of our employees, aiming to minimise the risk of modern slavery. As a result, the risk of modern slavery occurring in our direct workforce is low due to our control over recruitment and employment practices.

Given the labour shortages in the horticulture industry and regional areas, we rely heavily on seasonal migrant workers. Many of these workers are engaged in seasonal or casual work and hold temporary visas. Some of our migrant workers are employed under the PALM Scheme, where their temporary visa is linked to their employment and sponsored employer in Australia. We identify that the employment of migrant workers poses potential risks due to language barriers and their limited understanding of their human rights.



RISK IN OUR SUPPLY CHAIN

Fresh Produce Group has a complex supply chain that extends beyond Australia, which may expose us to risk. We acknowledge that visibility may be limited with our indirect suppliers.

Within our supply chain, we have identified the following areas that carry a higher risk of causing or contributing to modern slavery practices:

Third-Party Suppliers: Fresh Produce Group outsource logistics, transport, distribution, and information technology services from third-party suppliers.

Labour Hire Providers: Fresh Produce Group utilise the services of labour hire companies to supply temporary workers for seasonal tasks across our locations during certain times of the year.

Partner Growers and Suppliers of Produce: Fresh Produce Group partner with growers and suppliers directly and indirectly across Australia and overseas to source produce.

Although we partner closely with our growers and suppliers, and have processes in place to monitor compliance, there is still a risk that we may contribute to modern slavery practices where there is limited visibility and control.



ADDRESSING RISK

In addition to reinforcing our existing approach, over the last five years Fresh Produce Group have implemented new policies, procedures and systems to address the risk of modern slavery within our operations and supply chain.

Our internal policy framework encompasses various guidelines and procedures that emphasise our commitment to ethical business conduct. These policies are applicable across all our locations and undergo annual reviews. Each of the policies and procedures summarised below play an important role in mitigating the risks associated with modern slavery.

Code of Ethics	States our commitment to meeting all obligations towards honesty, integrity and the health and safety of staff, customers, and consumers. Holding ourselves accountable in every aspect of the business including staff, customers, suppliers, and community.
Ethical Sourcing Policy	Sets out our commitment to source products in a responsible manner while working with suppliers to improve their ethical practices.
Freedom of Association Policy	States out our commitment to upholding the legal rights of employees and independent contractors to choose whether or not to join a union.
Human Rights and Ethical Trading Policy	States our commitment to ethical and responsible trading practices, consistent with local laws and the international standards outlined in the Ethical Trading Initiative Base Code (ETI Base Code). Outlines our expectations of our suppliers to ensure their practices respect human rights and meet the principles of the ETI Base Code.
Labour Hire Compliance Policy and Procedure	Outlines our approach to manage the risks of engaging labour hire agencies. Sets out our commitment to ensuring all labour hire companies engage in a lawful and ethical manner and explains the methods we use to monitor their compliance with all relevant legislation and standards.
Verification of Entitlement to Work Policy	States our commitment to ensuring all workers engaged have the legal right to work in Australia and explains the method we use to verify the right to work and comply with visa restrictions, limitations or conditions.
Whistle Blower Policy and Reporting Procedure	Outlines our process for the reporting of wrongdoing and protections to support individuals reporting wrongdoing. This policy and procedure encourages individuals, including current or former employees, suppliers, and others they are associated with, to report unethical behaviour and conduct.
Young Workers and Child Labour Policy	Sets out our approach to young labour and child labour with the ultimate aim of ensuring the safety and protection of children.

LABOUR PRACTICES DUE DILLIGENCE

Fresh Produce Group employ workers directly across all locations whenever possible. By engaging employees directly, we maintain control over recruitment and employment processes, ensuring the prevention of modern slavery practices.

All new direct employees must engage willingly into employment, provide evidence of their Australian working rights, provide evidence of their age and identity, and complete induction and onboarding processes. Once onboard, we have visibility of all aspects of payments, deductions, and work hours through our centralised payroll system. We also have systems in place to continually monitor working rights of employees to ensure that we are meeting our legal obligations for those on temporary work visas. These measures contribute to fostering a transparent and fair work environment.

Given the seasonal demands within our business and labour shortages across our locations, we participate in the PALM Scheme and partner with labour hire providers to source temporary workers. These sources of labour supplement our direct workforce during peak production periods.

We have due diligence processes in place to monitor labour hire providers and our suppliers to verify their compliance with labour laws and ethical guidelines. We partner with labour hire companies, suppliers and growers to reinforce our expectations for labour practices.



PALM SCHEME

Within Fresh Produce Group we have four entities that are Pacific Australia Labour Mobility (PALM) Scheme. Since 2018, these entities have participated in the Scheme to recruit workers from the Fiji, Timor-Leste, Vanuatu and the Solomon Islands to work on our farms. Majority of our PALM workforce is employed directly under the Short-Term Stream for 6-9 months during our peak periods. We also have skilled workers employed directly under the Long-Term Stream working in ongoing roles for up to four years.

The PALM Scheme is regulated by the Australian Government and workers engaged under the Scheme are sponsored by their Approved Employer, allowing them to work in Australia on temporary working visas that are tied to their employment.

As workers could be perceived as being bound to their employment through their sponsorship arrangement, we take proactive measures to mitigate the risk of modern slavery. Workers are able to transfer their employment and sponsorship to a new Approved Employer or repatriate back to their home country if they choose to cease employment with FPG. We ensure that workers understand their rights and the options available to them through arrival briefings, fortnightly meetings, and regular communication.

When mobilising PALM workers we cover the upfront cost of travel and visas. Workers authorise the repayment of these costs through payroll deductions, however we acknowledge the potential risk of this arrangement being perceived as debt bondage.



To mitigate this risk, we provide comprehensive education and transparent communication during the pre-departure briefing and induction process to clearly explain the purpose of deductions.

To ensure the welfare and wellbeing of PALM workers, we employ dedicated Worker Welfare Officers to provide support throughout their employment. These officers work closely with workers to assist them in understanding their rights whilst working in Australia. Our Worker Welfare Officers collaborate with workers to bridge the gap where language barriers exist by providing translated documentation, verbal translations through Team Leaders, and connections with community organisations representing Pacific Island and Timor-Leste communities.

MONITORING LABOUR HIRE

Fresh Produce Group have internal management systems and procedures to monitor labour hire provider compliance. To partner with us, all labour hire providers are required to have a current labour hire or service agreement in place. Prior to reaching an agreement, these providers must supply documentation, including valid labour hire licenses and appropriate insurances. Along with agreements, we distribute a Labour Hire Information Sheet to providers to outline our expectations.

We are committed to monitoring labour hire providers to ensure adherence to ethical standards and compliance with labour laws and regulations.

Over the last 12 months, FPG have partnered with 30 labour hire companies to supply workers across our locations. We conduct regular internal audits of these providers to maintain visibility and ensure they are complying with our expectations of labour practices and working conditions. These audits consist of random spot checks, quarterly reviews and annual reviews of each company. In addition to internal audits, the labour hire providers also have their payroll and employment records reviewed by third-party auditors when our sites participate in SMETA audits.

Through our monitoring activities we actively communicate our expectations with providers to mitigate the risk of modern slavery practices. In cases where these expectations are not met, we take disciplinary action by terminating these partnerships.



MONITORING SUPPLIERS

Fresh Produce Group expect that all people employed by our partner growers and suppliers are employed and treated fairly and ethically.

We maintain an Approved Supplier Program, which includes internal audits conducted through on-site visits and our Horticulture Produce Agreements. Approved Suppliers within this program must adhere to our Ethical Sourcing Policy and meet our expectations and requirements, including compliance with local laws and international standards as outlined in the ETI Base Code (founded on the conventions of the International Labour Organisation (ILO)).

As an AB member of Supplier Ethical Data Exchange (Sedex), we utilise Self-Assessment Questionnaires (SAQs) and Sedex Members Ethical Trade Audits (SMETA) to monitor sites within our supply chain. These online questionnaires and third party audits align with the ETI Base Code and give us visibility of our suppliers, including details on employment practices, work health safety, business ethics, and environmental management.

Our primary warehouse and farm locations complete SAQs and undergo annual 4-pillar SMETA audits. Our Australian partner growers and suppliers, who supply major domestic retailers, are also Sedex members and actively participate in completing SAQs and SMETA audits. We also expect our international growers to adhere to the ETI Base Code and maintain management systems that ensure quality assurance and ethical practices. Over the past 12 months, more than 50 of our suppliers have completed an SAQ, and over 30 have participated in SMETA audits.



INCREASING AWARENESS

Fresh Produce Group expect that all staff within our business are aware of the risks of modern slavery within our supply chain. To increase awareness we provide training and discuss the risks in group-wide taskforces.

All employees in our business receive an induction. This includes training and information on modern slavery awareness and our third-party whistle-blowing policy and procedure. This ensures that all new staff are well-informed about the issue and understand the methods of reporting wrongdoing. In addition to this, our staff members in the technical compliance and produce trading departments have undergone online training modules on modern slavery, strengthening their knowledge and understanding of this issue.

Fresh Produce Group have an established Environmental, Social and Governance (ESG) Taskforce to drive continuous improvement and address key areas such as modern slavery, human rights, employee well-being, and business ethics. This taskforce includes members from our Senior Leadership team as well as staff across all levels of the organisation. These staff members meet as a dedicated forum to discuss and foster positive change.

By leveraging the diverse expertise and perspectives of its members, the taskforce strives to make progress in areas crucial to our stakeholders and the overall sustainability of our operations.



ASSESSING EFFECTIVENESS

Our company is committed to assessing the effectiveness of our policies and practices to identify and prevent modern slavery in our supply chain and operations. Each year, through producing this statement, we conduct a review of our actions and assess the risks related to modern slavery practices. Fresh Produce Group have a continuous learning and improvement approach to modern slavery. It is a complex issue, so our goal is to continuously minimise the risks within our operations and supply chain and ensure that our actions align with best practices and industry standards.

Over the last five years since publishing our first statement, we have taken the following actions to reduce the risks of modern slavery within our operations and supply chain.

- Increased our participation in third-party ethical auditing (SMETA) across our own sites and the sites of our partner growers and suppliers.
- Implemented a Code of Ethics to state our commitment and hold all aspects of our business accountable.
- Reviewed our Whistle Blowing Policy and Procedure by engaging a third-party provider to further to encourage anonymous reporting of unethical behaviour.
- Established a Labour Hire Compliance Policy and Procedure to ensure maximum visibility and compliance of third-party labour hire providers.
- Reviewed our induction information and training materials to increase awareness and understanding of modern slavery risks and practices.
- Focus on continuous improvement driven by the ESG Taskforce by setting goals and achieving outcomes relating to modern slavery, human rights, employee wellbeing and business ethics.



STATEMENT OF APPROVAL

This statement has been approved by
The Board of Directors of Fresh
Produce Group on 18 December 2024.



ROBERT NUGAN

Chief Executive Officer



ANTHONY POINER

Chief Executive Officer

