SAFCOL AUSTRALIA PTY LTD



Modern Slavery Statement 2025





RIGHT TO AFFILIATION



UNIVERSAL HUMAN RIGHTS



FAIR WORK CONDITIONS



RIGHT TO REPRESENTATION



SAFE WORK CONDITIONS





FOREWORD

Safcol Australia Pty Ltd (Safcol) is committed to ethical and socially responsible business practices. We are a diverse community and we treat each other as equals, regardless of background. Safcol is respectful of the communities in which we work and with whom we work, we remain sensitive to cultural needs and requirements. We expect our suppliers and customers to join us in the commitments to human dignity and respect irrespective of background or culture.

Safcol is serious about detecting, preventing and fighting against modern slavery in our operations and supply chains.

BUSINESS OVERVIEW

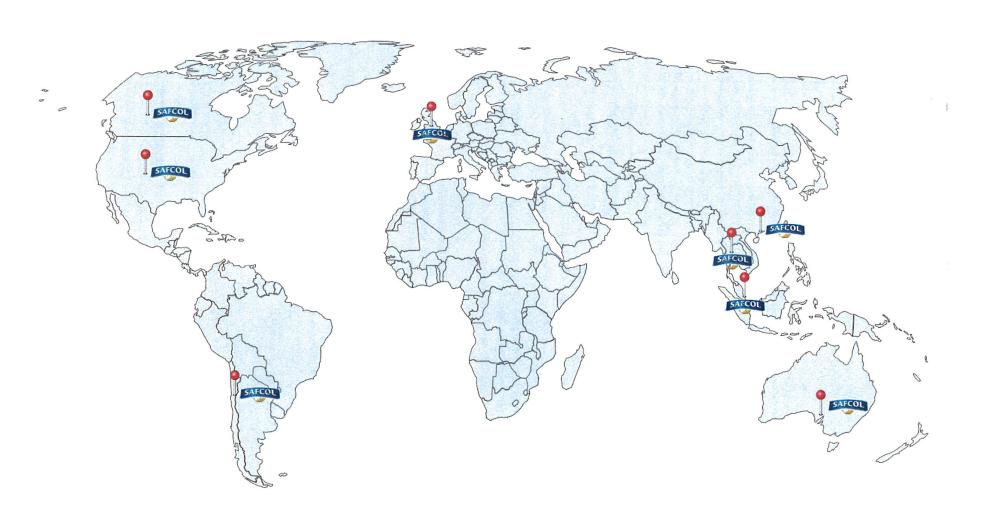
Safcol Australia Pty Ltd was founded in 1945 by a group of South Australian Fishermen to sell their catch; the first of its kind in Australia. This connection with the craft and the catch has been constant throughout our history. Today, Safcol continues to manage the thriving South Australian Fish Market and is a diversified consumer products group, marketing its products across the Australian Retail Market in supermarkets and other specialty stores. Safcol carries the mantle of The Seafood Experts proudly and is the only seafood company in Australia controlling its catch from ship to shelf. Safcol is one of the world's major suppliers of fresh, packaged and frozen seafood. We are respected for our philosophy of sustainability and our guarantee of quality.

We have over 75 years experience, from traditional beginnings to the operation of fleets and plants around the world. We can supply virtually every type of seafood, fresh or frozen. Safcol services a wider market than most other suppliers of quality seafood: Australia, New Zealand, Singapore, Hong Kong, China, Thailand, Malaysia, Greece, the Middle East, Slovenia, Chile, Canada and the USA. Safcol has built a loyal following of discerning customers. We continually develop new products and meet government standards in all markets. Our catch is delivered direct to our canning and processing plants. We do not operate "mother ships" that operate as floating freezers.

Our wild tuna catch is certified "Dolphin Safe" by the Earth Island Institute. We respect marine conservation. We comply with the highest EU and USA standards and have the knowledge to comply with all other standards of the countries we deal with. Safcol strives to operate free from exploitation, discrimination, bullying and harassment or marginalisation of anyone.

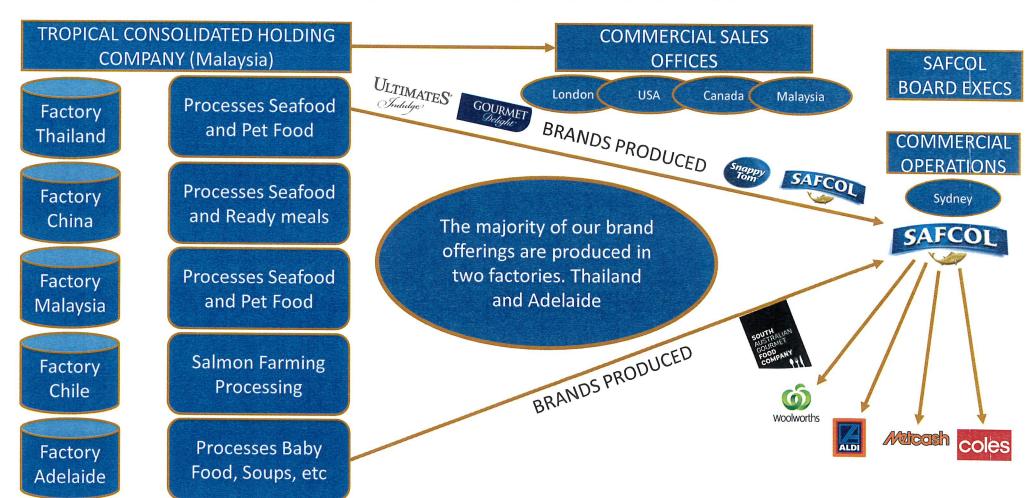


OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN





OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN





Safcol Third-Party Suppliers' Geographic Locations (Indicated by Safcol Logos)

Third-Party Product Supply Partners

China – Instant noodles, Soy Sauce, Fish Sauce, Sesame Oil

Spain - Olive Oil

Poland – Brisling Sardines

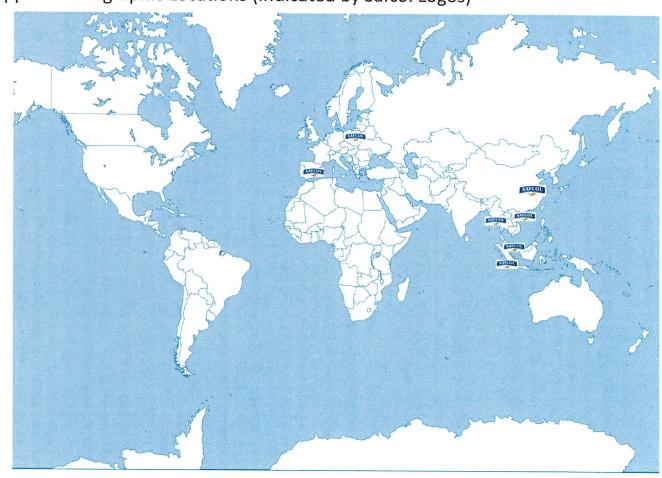
Indonesia – Tuna & Sardines

Singapore – Cooking Oils

Vietnam – Tuna

Thailand – Sardines

Listed suppliers supply slave labour and human rights audits to Safcol as part of Safcol Business protocols.





OUR PRODUCTS & SERVICES

Safcol is one of the world's major suppliers of fresh, packaged and frozen seafood. We are respected for our philosophy and sustainability and our guarantee of quality.

Our customer base includes food wholesalers, distributors and retailers; major supermarket chains, commercial caters and the food service industry.

Our Products

~ Tuna ~ Salmon ~ Sardines ~ Squid ~ Mussels ~ Oysters ~ Pet Food

SAFCOL South Australian Fish Market

Founded in 1945, our South Australian fish market continues to thrive.





OUR SUPPLY CHAINS



Safcol's supply chain is a vast network of service providers and suppliers to support it's operations. From product ingredients, packaging and labelling to consumables, personal protective equipment (PPE), contract services and maintenance contractors. We also purchase fresh and frozen seafood as required from third parties.

We support Australian suppliers where possible and partner with quality suppliers that share our commitment for ethical and socially responsible business practices.



RISK OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Whilst we acknowledge that some of the groups within our supply chain may be associated with higher risks of exploitation and slavery due to their geographical location, as part of our contracting processes, we carry out our due diligence to ensure severe modern slavery practises such as forced and bonded labour are not taking place.

Safcol employs the services of global auditing companies to gain visibility into areas of risk within our business and supply chain. Thereby allowing us to prioritise higher levels of risk and take action before they become a problem.

To date, these audits have not detected any modern slavery practises, therefore we report our risk as LOW.

Safcol is dedicated to it's commitment to continually assess its operational risk and should any concerns be detected the issue will be escalated to the CEO and Board for consideration and action at the enterprise risk level.

Low risk is achieved and maintained by:

Third Party Audits

Safcol and our holding company supply world renowned grocery retailers like Walmart, Aldi, Woolworths Australia and Coles Australia. We partner with these retailers in audits of our operations conducted by Intertek and Sedex, amongst others. Annual audits take place in all of our factories and operations, both locally and internationally.

Adherence to labour & safety laws of the country

Safcol adheres to all labour laws of the country in which they operate in line with UN Universal Declaration of Human Rights.

Governance & Control

Safcol is an active participant in third party audits and our management team, led by our CEO is vigilant about protecting the rights of workers, and this sets the culture for the entire organisation. Safcol has a range of policies and procedures which sets the expectation and standard that our factories and supply chain must adhere to.

Workforce Management

Safcol in Australia hires workers directly, so we have a 'hands on' approach to dealing directly with our employees.

Detection & Mitigation process

This is a continual 6 step process, return to step one and repeat.





ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY

Safcol has developed a human rights strategy to assist with identifying, preventing, mitigating and remedying any risks. Our strategy comprises of a comprehensive library of policies and procedures underpinned by our Code of Conduct and is a collaborative, risk-based and quality management approach with a focus on continual improvement. We maintain compliance with internally recognised standards demonstrating our commitment to ethical, safe, and responsible practices across our operations and supply chain.





HUMAN RIGHTS POLICY

Purpose and Commitment

- Safcol Australia recognizes that all human beings are entitled to dignity, equality, and respect.
 We are committed to conducting our business in a way that upholds and promotes internationally recognised human rights across our operations and supply chain.
- Our approach is based on the principle of reciprocal respect for each individual's worth, fairness, and freedom. This policy applies to all employees, contractors, suppliers, and business partners engaged with Safcol Australia.
- This policy directly supports Safcol's Labour Policy, which emphasises our commitment to human rights as a fundamental part of how we conduct business and work with our employees and suppliers. Together, these policies reflect our mission of producing quality products while providing social, environmental, and economic benefits to the people and communities in which we operate.

Guiding Frameworks and Standards

Safcol Australia upholds and respects human rights as reflected in the following international and national instruments:

- United Nations Universal Declaration of Human Rights (UDHR)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- Modern Slavery Act 2018 (Cth)
- Fair Work Act 2009 (Cth)
- Work Health and Safety Act 2012 (SA)
- Equal Opportunity Act 1984 (SA) and relevant federal and state anti-discrimination laws.

Safcol's Labour Policy operationalises these principles through specific commitments to:

- Prohibit forced or compulsory labour;
- Eliminate child labour;
- Respect freedom of association and collective bargaining; and
- Prevent discrimination in employment and occupation.

Safcol Australia Commits To:

- Freedom of association and the effective recognition of the right to collective bargaining.
- The elimination of all forms of forced, bonded, or compulsory labour.
- The abolition of child labour and protection of young workers.
- The elimination of discrimination in employment and occupation.
- Safe and healthy working conditions that support both physical and psychosocial wellbeing.
- Fair remuneration, lawful working hours, and employment practices consistent with Australian law.
- Respect for privacy and protection from harassment or abuse.
- This policy extends to all employees, contractors, and suppliers, and we expect our business partners to uphold similar standards throughout their own operations and supply chains.



HUMAN RIGHTS POLICY

Implementation and Practices

- To promote and protect human rights throughout our organisation and supply network, Safcol Australia will:
- Comply with all applicable laws and international human rights standards.
- Regularly identify, assess, and mitigate risks of human rights violations and modern slavery through due diligence, supplier screening, and audits.
- Integrate human rights considerations into risk management, procurement, and operational decision-making.
- Provide accessible and confidential grievance mechanisms to allow employees, contractors, and stakeholders to raise concerns or report potential human rights breaches without fear of reprisal.
- Promptly investigate allegations of human rights abuses or labour rights violations and implement corrective and preventative actions where necessary.
- Deliver awareness and training programs to promote understanding of human rights and Safcol's responsibilities among employees and managers.
- Communicate and disseminate human rights principles to suppliers and business partners through the Supplier Code of Conduct and related documents.
- Foster transparent reporting on human rights performance, including through the Modern Slavery Statement.
- Continuously improve our human rights practices by monitoring developments in laws, standards, and stakeholder expectations.

Ethical Conduct and Accountability

Safcol insists on ethical business conduct from all employees, suppliers, and partners. We believe that ethical, sustainable, and transparent operations are essential to maintaining trust with our employees, consumers, and the communities in which we operate.

Safcol's commitment to respect human rights is demonstrated through our integration of these principles into our key corporate policies, including:

- Labour Policy
- Modern Slavery Statement
- Work Health and Safety Policy
- Equal Employment Opportunity and Anti-Discrimination Policy
- Code of Conduct
- Supplier Code of Conduct

Reporting and Grievance Mechanisms

- Safcol Australia provides accessible and confidential mechanisms for reporting any human rights concerns, labour rights violations, or ethical issues.
- Reports may be made by employees, suppliers, contractors, or external stakeholders.
- Concerns can be reported through the following channels:
- Customer Care Line: 1800 819 785
- Email: mail@safcol.com.au
- Anonymously: Safcol Australia Pty Ltd , Attn: Human Rights Committee Reply Paid 1085, PO Box 1085, ELIZABETH VALE SA 5112

All grievances will be treated seriously and confidentially, with protection from retaliation for any individual who raises a concern in good faith.



HUMAN RIGHTS POLICY

Governance and Oversight

To support the effective implementation and monitoring of this policy, Safcol Australia has established a Human Rights Policy Committee, comprising senior management representatives responsible for ensuring compliance and continuous improvement.

Committee Members:

Chief Executive Officer Chief Financial Officer Chief Operating Officer People & Culture Manager Technical Manager

The Committee's responsibilities include overseeing the human rights framework, reviewing reports or grievances, and recommending corrective actions or policy updates where required.

Review

This policy will be reviewed annually, or sooner if legislative or operational changes require it, to ensure ongoing alignment with international best practice and Australian law.

CONSULTATION PROCESS

Safcol Australia has a range of measures in place to support consultation about modern slavery risks across our business.

Major stakeholders have been consulted in conjunction with the writing of our Modern Slavery Statement to ensure the risk assessment process is an accurate representation of current practices.

Safcol is registered with the Modern Slavery Business Engagement Unit to receive updates to any changes in legislation to ensure compliance.

APPROVAL

This statement has been considered and approved by the Safcol Australia Board of Directors in their capacity as principal governing body of Safcol Australia Pty Ltd on 8TH October 2025.

Andrew Mitchell

Chief Executive Officer and Board Member