



Modern Slavery
Statement
2026



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.

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Modern slavery is an umbrella term for serious exploitation where people are deprived of their freedom through coercion, threats, deception or violence.¹ Under the *Australian Modern Slavery Act 2018 (Cth)* it covers eight practices: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.² A severe breach of human rights, it often goes unseen in global supply chains – including in Australia.³

1. Walk Free, "What is modern slavery?": <https://www.walkfree.org/what-is-modern-slavery/>
2. Australian Modern Slavery Act 2018 (Cth), s4. Australian Government, modernslavery.gov.au: <https://www.modernslavery.gov.au/about-modern-slavery>
3. Global Slavery Index methodology/FAQs: <https://www.walkfree.org/global-slavery-index/methodology/faqs/>

About this Statement

This Modern Slavery Statement (Statement) is made in accordance with the *Australian Modern Slavery Act 2018 (Cth)* (Act) and meets the disclosure requirements of the *United Kingdom (UK) Modern Slavery Act (2015)*. This Statement also informs SunRice Group’s 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 ABN 55 007 481 156 and Riviana Foods Pty Ltd ABN 97 061 388 092, which have been determined as reporting entities under the Act. This Statement describes the actions taken by the reporting entities, and their owned and controlled entities, to assess and address modern slavery risks in their operations and supply chains for the reporting period 1 May 2025 to 30 April 2026 (SunRice Group’s financial year (FY26)).

Unless expressly stated otherwise, references in this Statement to “SunRice Group”, “SunRice” and “Group” refer to Ricegrowers Limited, Riviana Foods Pty Limited and the other owned and controlled entities of Ricegrowers Limited. Their operations and supply chains form part of the operations and supply chains of the reporting entities.⁴ All policies, processes and activities discussed in this Statement are applicable to SunRice Group, unless otherwise specified.

4. See SunRice Group 2026 Annual Report which is available [here](#). Refer to page 123 for a description of SunRice Group’s operating segments and Appendix 1 of this Statement for a full list of Ricegrowers Limited’s owned and controlled entities that comprise the SunRice Group.

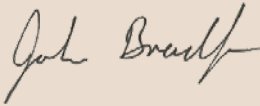
During the reporting period, Ricegrowers Uruguay S.A. was established as a new entity under Ricegrowers Limited. The entity was dormant throughout FY26 and, as a result, did not affect the Group’s modern slavery risk profile. A full list of the Group’s owned and controlled entities is provided in Appendix 1.

In accordance with the requirements of section 14(2)(d)(i) of the *Australian Modern Slavery Act 2018 (Cth)*, this Statement was approved on 1 September 2026 by the SunRice Board and signed by Paul Serra, SunRice Group CEO and Managing Director and John Bradford, Chair of the Board, on behalf of both reporting entities.



Paul Serra
Group CEO and
Managing Director

1 September 2026



John Bradford
Chair



SunRice Group
Speak Up!

SunRice Group is committed to ensuring its people, community members impacted by its activities, its customers and those in its supply chain have access to an effective grievance mechanism. If you have concerns about issues relating to labour exploitation in the Group’s 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 (US)
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



Group CEO and Managing Director message

I am pleased to present SunRice Group's 2026 Modern Slavery Statement.

Since our beginnings in 1950 as a business founded by Riverina rice growers, SunRice has grown into a leading global branded food company operating across almost 50 markets worldwide. As our business has evolved, we have become increasingly mindful of the responsibility that comes with operating a complex global business, and the impact our decisions may have on the people connected to it – from our growers and employees to our customers, suppliers and communities.

The values that shaped SunRice's beginnings continue to guide us today. As we execute our 2030 Growth Strategy and work to create long-term value for our stakeholders, we remain committed to operating responsibly, respecting human rights and protecting the dignity and wellbeing of people across our operations and supply chains. Addressing the risk of modern slavery is an important part of meeting that responsibility.

This Statement outlines the steps we took during FY26 to strengthen our approach to identifying, assessing and managing modern slavery risks. We also continued embedding the Group's Sustainability Strategy, including our commitment to human rights and, in this Statement, have introduced our new modern slavery goals and actions, giving us a stronger foundation to track progress and drive continuous improvement in the years ahead.

FY26 was also a year of continued evolution for SunRice. We transitioned to a new divisional operating structure and reporting framework to better support the delivery of our Growth Strategy and reflect the way our business operates today. As our sourcing footprint continued to diversify, we strengthened due diligence processes across our supply chains and maintained a focus on understanding and managing emerging risks.

We know that addressing complex human rights challenges requires ongoing vigilance, collaboration and learning. During the year, our teams took part in industry forums and peer engagement to better understand emerging risks and leading practice. These engagements strengthened our own capabilities while contributing to broader efforts to address modern slavery across industries and supply chains.

While we welcome continued progress on how modern slavery is governed in Australia, our commitment to addressing modern slavery risks is not only dependent on legislative change: it is also driven by the standards we set for ourselves, our values, and our responsibility to the people who contribute to our success.

As we look ahead, we will continue to work across our business and alongside suppliers, customers and industry partners to uphold human rights and reduce the risk of modern slavery in all its forms.

Thank you for taking the time to read this year's Statement.



Paul Serra

Group CEO and Managing Director
1 September 2026

FY26 highlights

During FY26, SunRice continued to embed its approach to modern slavery risk management in alignment with the Group Sustainability Strategy. Highlights included:

- Enhancement of the Group's approach to identifying priority focus areas in its supply chain for modern slavery risk management, supporting a more targeted approach to due diligence and supplier engagement (see page 19).
- Completed social and ethical audits (using Sedex Members Ethical Trade Audits (SMETA⁵)) at four operational sites in Australia, bringing the cumulative number of sites audited over the last three years to 10 (see page 17).
- Through a cross-functional review, progressed the Group's approach to harvest-related labour rights risks, including risks associated with longer working hours and labour hire (see page 18).
- Published Supplier Sustainability Guidelines and an explainer video to support supplier implementation of the Group's Supplier Sustainability Code. The Code and Guidelines were made available in eight languages (see pages 15 and 16).
- Continued to build employee capability to assist in assessing and addressing risks of modern slavery in SunRice's operations and supply chain through e-learning modules, Ethical Trading Initiative (ETI) Base Code training and practical support through tender and New Product Development (NPD) processes (see page 21).
- Continued embedding modern slavery considerations into supplier contracts, procurement tenders, NPD processes and other supplier-related business activities (see page 20).

5. SMETA audits, governed by Supplier Ethical Data Exchange (SEDEX), assess the standards of labour, health and safety, environmental performance, and ethics at an operational site. They are designed to help protect workers from unsafe conditions, overwork, discrimination, low pay and forced labour.

Our structure, operations and supply chain

SunRice Group’s structure and operations

SunRice has a heritage as a proudly Australian business founded by Riverina rice growers in 1950. Since then, it has evolved into a leading global branded rice food company operating across nearly 50 markets worldwide.

In FY26, the Group transitioned to a new divisional structure to align with its strategic priorities and market proximity. Under the structure there are four new reportable segments (see page 6).

The reporting entities under the Act remain the same:

- **Ricegrowers Limited:** Ricegrowers Limited, the Group’s parent entity, is incorporated in Australia and listed on the Australian Securities Exchange (ASX) (Ricegrowers Limited: SGLLV).
- **Riviana Foods Pty Limited:** A wholly owned subsidiary of Ricegrowers Limited and is incorporated in Australia.

A full list of the Group’s controlled entities 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 1.

A and B Class Shareholders

Ricegrowers Limited has a dual class share structure, with B Class Shares being able to be held by investors generally and A Class Shares being limited to rice growers who meet the production quotas prescribed by the SunRice Constitution. Details of this structure are available in the Shareholder Information section of the Group’s FY26 Annual Report. B Class Shares of Ricegrowers Limited are publicly traded on the ASX (code SGLLV).

6. Senior Management includes Senior Executives and their direct and indirect reports, who have responsibility for the creation and implementation of long-term strategy, autonomy and/ or leadership responsibilities.



 Operations in **10** countries across **~65** sites

 Sales in **50** global markets close to across 4 key regions

 Rice sourced from more than **12** countries, including Australia

 **~2,300** employees

Type of employment:	97% permanent	3% temporary fixed term or casual
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Senior Management: ⁶	39% Female	61% Male
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Labour hire:	42 seasonal workers employed for Australian harvest	~10% of US workforce
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SunRice Group's structure and operations

45 brands



4 Key operating regions



Australia and New Zealand (ANZ)

1,124 employees, 33 offices, manufacturing and storage sites across ANZ.

Pacific and Asia

1,056 employees, 28 offices, manufacturing and storage sites across Singapore, Vietnam, Japan, Papua New Guinea (PNG) and Solomon Islands.

Europe, Middle East and Africa (EMEA)

18 employees, two offices, manufacturing and storage sites in the United Arab Emirates (UAE) and Jordan.

North America

93 employees, three offices, manufacturing and storage sites in the United States of America (US).

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

4 Segments



Australia and New Zealand Consumer Packaged Goods

This segment earns revenue from the sale of primarily branded rice and rice-based products, as well as other grocery food and companion animal nutrition products, manufactured by the Group or sourced from third party producers, to retail, foodservice, and other industrial customers in Australia and New Zealand.

International Consumer Packaged Goods

This segment earns revenue from the sale of primarily branded rice and rice-based products, manufactured by the Group or sourced from third party producers, to retail, foodservice, and other industrial customers in global locations (primarily the US, Middle East, Pacific and Asia) outside of Australia and New Zealand.

Bulk Rice and Animal Feed

This segment earns revenue from the bulk sale of unbranded rice manufactured by the Group primarily to government customers in global locations (primarily in Asia). It also earns revenue from the sale of branded and unbranded animal feed products manufactured by the Group to agricultural customers in Australia and New Zealand.

Corporate

This segment comprises the cost of central functions and activities that are not directly attributable to the operating segments. It also captures centrally managed income and cost items that are not allocated to the operating segments.

SunRice Group’s supply chain

SunRice Group takes a multi-origin, multi-market approach to securing a reliable and adaptive global supply chain. This is particularly true for rice sourcing, where geographical diversification of the Group’s supply sources is a core enabler of its 2030 Growth Strategy. The Group spent approximately A\$1.5 billion during the reporting period with around 4,400 suppliers, with rice comprising SunRice’s largest procurement category by volume and spend (See Table 1 which captures top countries by spend and Table 2 which includes rice under “Raw materials”). In FY26, SunRice sourced rice from more than 12 countries,⁷ including Australia, to meet global demand. Other products and services procured included raw materials (e.g. agricultural products and food ingredients), packaging and contract manufacturing, professional services and logistics services. The majority of SunRice’s spend with suppliers is managed by the Group’s procurement teams and the International Sourcing function.

SunRice Group global locations and EiQ country risk rating⁸

EiQ is a third-party, integrated supply chain Environmental, Social, and Governance 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.



SunRice Group uses the data to gain insights into key risk areas, including modern slavery risks, and draws on EiQ’s Sentinel tool to scan for risks and insights associated with some of its suppliers. These insights also inform the assessment of country risk however do not take into account any mitigating measures that the Group has in place.

Table 1: Top countries by spend⁹

Country	Number of suppliers	EiQ country risk rating
Australia	2,596	Medium
US	450	Medium
Thailand	21	High
China	15	High
Vietnam	279	High
Papua New Guinea	636	High
Italy	22	Medium
New Zealand	165	Low
India	12	High
France	8	Low



Table 2: Supply chain categories by relative spend

Category of spend	Relative spend	Top 3 countries by spend
Raw materials	● ● ● ● ●	Australia, US, China
Logistics	● ● ● ● ●	Australia, PNG, US
Other	● ● ● ● ●	Australia, US, PNG
Contract manufacturing	● ● ● ● ●	Thailand, Italy, France
Facilities management services	● ● ● ● ●	Australia, PNG, US
Packaging materials	● ● ● ● ●	Australia, China, US
Plant and equipment	● ● ● ● ●	Australia, US, PNG

7. SunRice Group’s rice sourcing countries in FY26 were Argentina, Australia, Cambodia, China, India, Italy, Pakistan, Taiwan, Thailand, the US, Spain, Uruguay and Vietnam.

8. This Statement uses EiQ’s 2026 country risk data.

9. These countries indicate the location of the Group’s direct suppliers. SunRice acknowledges that goods and services supplied by its direct suppliers may be (or have components that may be) manufactured or provided in other countries. The data in this table does not reflect total spend.

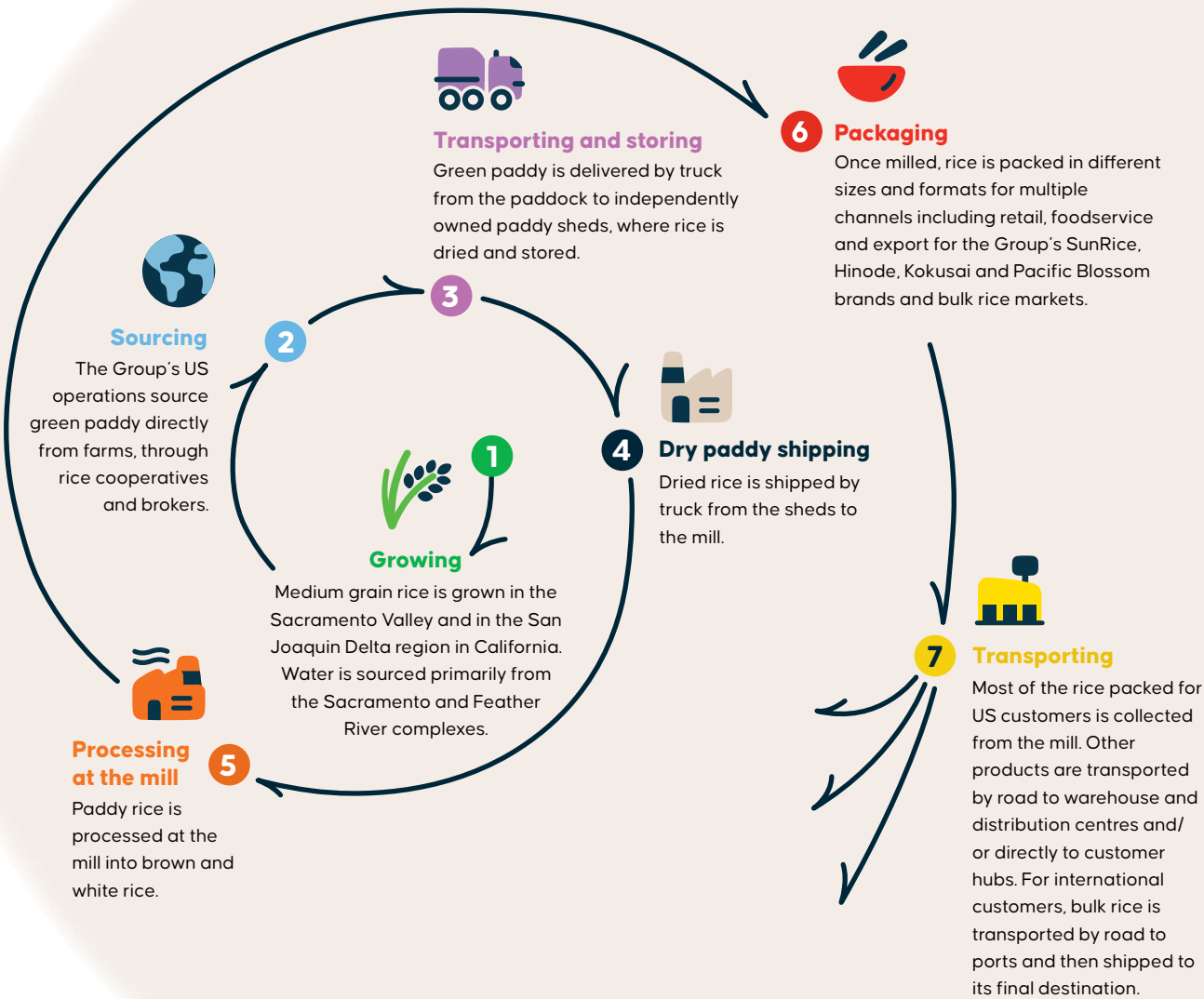
SunRice Group’s supply chain

Rice value chain

The Group’s international rice value chain differs depending on where 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 paddy 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 by road in Australia. Fluctuations in rice supply may vary from year to year depending on numerous factors, including natural disasters and climate-related hazards (e.g. drought, floods, wildfire); trade policies (e.g. tariffs, export bans); macroeconomic trends (e.g. inflation); increased commodity, input and supply chain costs; and/or geopolitical factors. In planning for anticipated drier conditions and reduced water allocations in the Riverina region of Australia, during FY26 SunRice continued to identify opportunities to diversify its rice supply chain. See page 12 for more information on the Group’s response to these changes.

The diagram to the right provides a high-level overview of some of the key stages in the growing, processing, transportation and distribution of the Group’s medium grain rice sourced in the US. The rice, which is grown in California, is a bold, round, shorter medium grain rice and accounted for approximately 20% of the Group’s FY26 rice supply.

Figure 1: US medium grain rice value chain



Identifying and understanding our modern slavery risks

Understanding how the Group could be exposed to modern slavery risks

As guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs), a business may cause, contribute to, 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.¹⁰ 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 Group's FY25 Statement provides an overview of the types of involvement and hypothetical examples to demonstrate how SunRice may potentially be involved in modern slavery.

SunRice has identified that it is more likely to be directly linked to modern slavery through its suppliers or other business relationships, rather than causing or contributing to it. There is however a risk that the Group may cause or contribute to modern slavery if adequate controls are not in place, or if credible allegations about a business partner, such as a supplier, are not investigated. The Group's commitment to remediation is outlined on page 23.

10. Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. Available [here](#).

Potential risks of modern slavery in the Group’s operations

Whilst the risk of modern slavery in the Group’s operations is low, due to the nature of SunRice’s business and geographic locations there are some inherent risks of modern slavery in its operations. Table 3 provides an overview of potential risks in SunRice’s operations and the Group’s mitigating actions and controls. Further information can be found in the ‘Assessing and addressing our modern slavery risks’ section.

~50% of the Group’s Australia and New Zealand employees are covered by an enterprise bargaining agreement

~12% of the Group’s Australian employees are covered by an award¹¹

100% of the Group’s Vietnam employees are covered by collective agreement

11. This figure differs from the FY25 figure as it was previously reported that the number of employees covered by award also included employees covered by an enterprise bargaining agreement.

Table 3: Potential risks of modern slavery in the Group’s operations

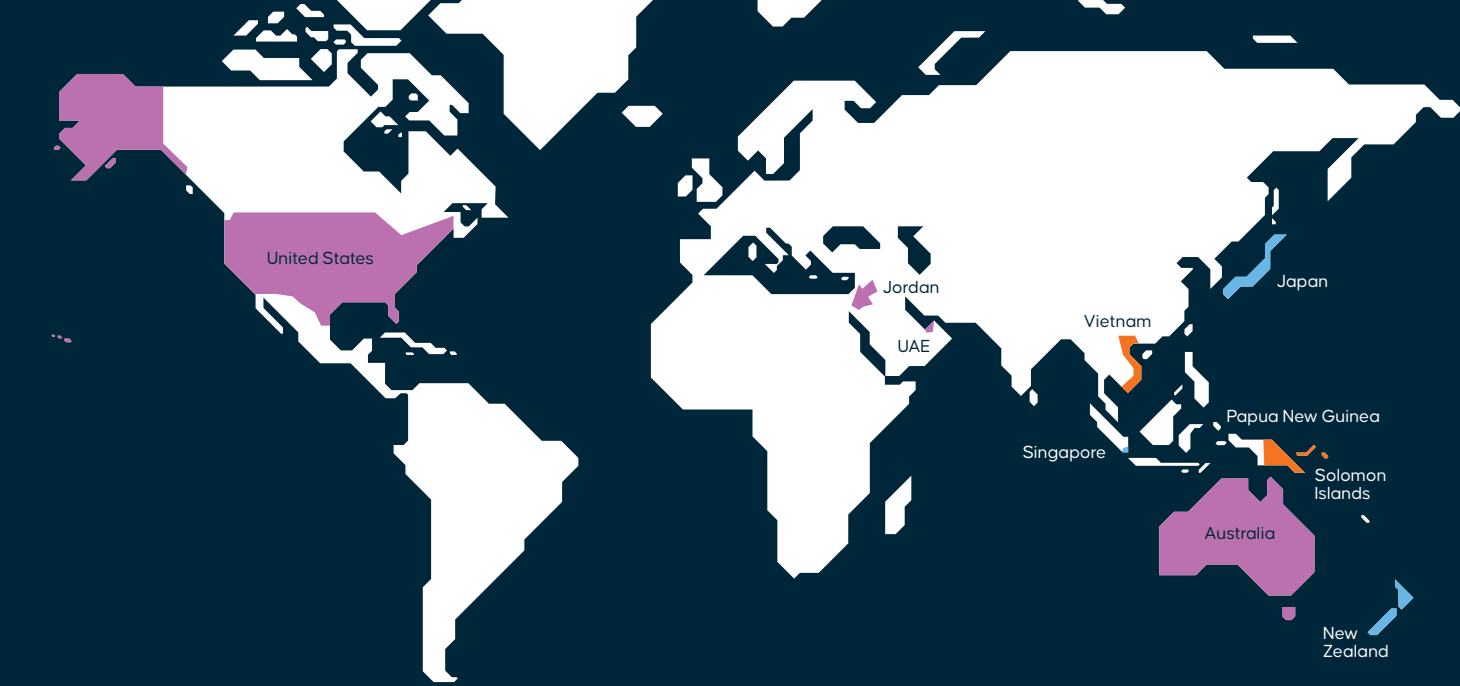
Business activity	Key risk factors	Risk mitigating actions/controls
Rice drying and storing Food processing and manufacturing (e.g. rice milling, finished goods production)	• Reliance on vulnerable or at-risk workers, including casual, seasonal, migrant and younger workers in manufacturing and post-harvest processes, which may lead to exploitative employment practices or pre-cursors of modern slavery. • Peak-period labour requirements that may increase risks associated with longer working hours, including the risk of involuntary overtime. • Use of labour hire providers, which may increase exposure to risks associated with misleading or exploitative recruitment practices, including debt bondage or forced labour. • Geographic-related risks, depending on the location of operations (see page 11).	• Governance, policy and accountability: The Group’s policies and governance arrangements support oversight of human rights and modern slavery risk management (see pages 14 and 15). • Risk assessment and due diligence: Harvest risk assessment and control review (see page 18); and the Group’s social and ethical audit program (see page 18). • Controls and monitoring: Training to support employees’ identification of modern slavery-related risks (see page 21); grievance and remediation mechanisms for employees to raise concerns; recruitment and employment arrangements for non-permanent workers including voluntary overtime and the prioritisation of permanent employment where appropriate; application of relevant enterprise agreements and awards; contracts with labour hire providers and monitoring through SunRice’s Labour Hire Checklist (see page 18); the Group’s social and ethical audit program; and monitoring of geographic-related risks relevant to the Group.
Corporate functions (e.g. sales, marketing, IT, administration, P&C)	• Geographic-related risks associated with office locations or operational activities (see page 11).	• Governance, policy and accountability: The Group’s policies and governance framework support oversight of modern slavery risk management (see page 15). • Risk assessment and due diligence: Assessment of geographic-related risks relevant to the Group. • Controls and monitoring: Training to support employee identification of modern slavery-related risks (see page 21); grievance and remediation mechanisms for employees to raise concerns and support for appropriate remediation; and monitoring of geographic-related risks.



Potential risks of modern slavery in the Group’s operations

Geographic-related risks

Modern slavery and labour exploitation can occur in any country. Some of the countries where SunRice Group operates have elevated risks, including PNG and Vietnam (see map to the right). During the reporting period, conflict in the Middle East presented additional risk considerations for the Group’s employees in the UAE, particularly regarding employee safety and the risk of displacement.¹² In response to this elevated risk, the Group engaged International SOS to consider evacuation plans and the need for relocating employees to other countries.



EiQ country risk rating

- EiQ country risk rating: low
- EiQ country risk rating: medium
- EiQ country risk rating: high
- EiQ country risk rating: extreme

SunRice Group Global Locations	EiQ country risk rating FY26
Australia	Medium
US	Medium
Japan	Low
Jordan	Medium
New Zealand	Low
Papua New Guinea	High
Singapore	Low
United Arab Emirates	Medium
Solomon Islands	High
Vietnam	High

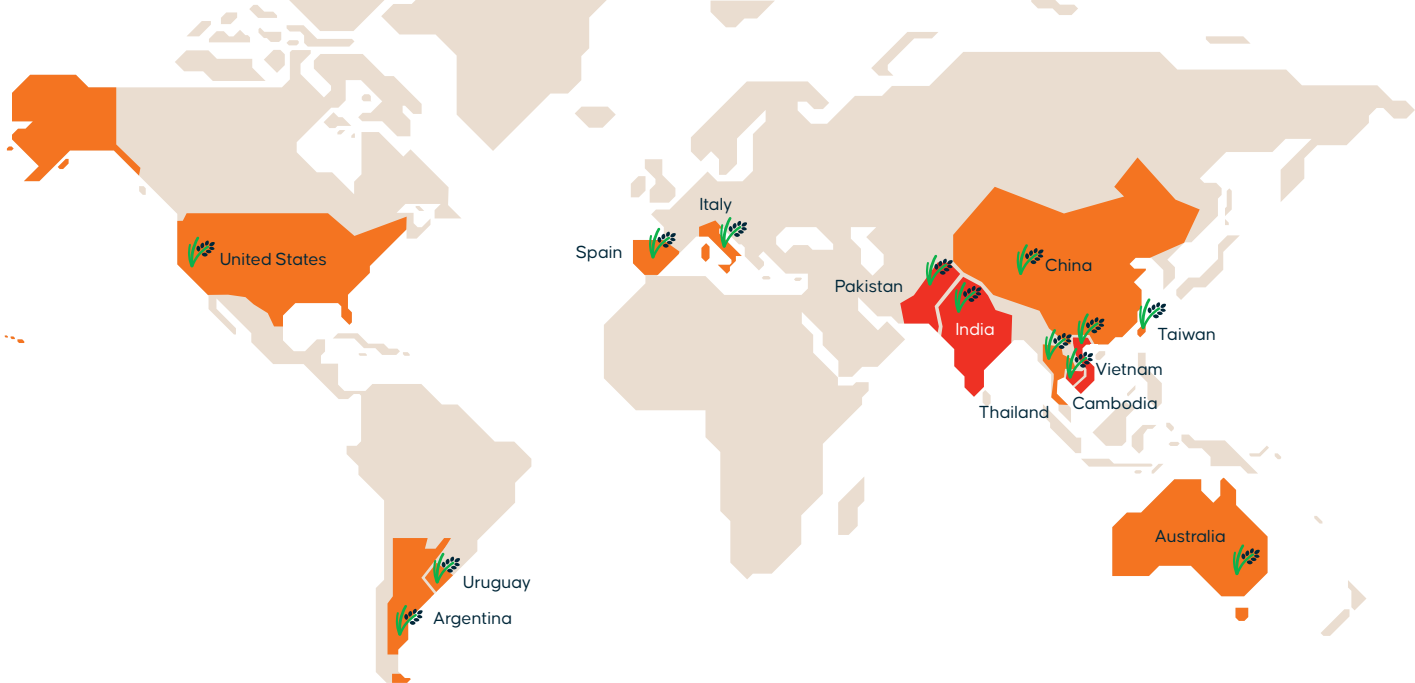
12. Conflict can contribute to the breakdown of governance and rule of law, increase displacement, and create or exacerbate vulnerabilities that heighten risks of exploitation and human rights abuses.
[OHCHR: Protecting human rights during conflict situations | OHCHR](#).

Potential risks of modern slavery in the Group’s supply chain

Globally, the agriculture sector is recognised as carrying risks of modern slavery. While SunRice is a significant purchaser, processor and marketer of rice grown in the Riverina region of Australia, during FY26, rice was sourced from a diverse range of suppliers located in countries with reported high risks of modern slavery (refer to the map to the right). The sourcing risk associated with rice in Australia has remained high, primarily driven by environmental-related factors, including water availability and the impacts of climate change, rather than modern slavery-related risks.

Heightened country and rice sourcing risks will be considered in the Group’s approach to supplier due diligence in FY27. SunRice has also identified that sourcing rice or rice-based products indirectly through aggregators, brokers, co-manufacturers or mills can reduce transparency of the Group’s supply chain.

Through workshops and desktop research, SunRice identified several goods and services that may be high-risk for modern slavery. These remain consistent with those identified in FY25. Further detail on the Group’s core focus categories – paddy rice processing and packing, food contract manufacturing (co-manufacturing) and labour hire is provided on page 13 (see page 19 for more detail on the process to identify these focus categories). For an overview of other high-risk goods and services that the Group procures, see the Group’s FY25 Modern Slavery Statement.



Combined EiQ rice sourcing and country risk

- Rice supply sources
- Combined EiQ rice sourcing and country risk: low
- Combined EiQ rice sourcing and country risk: medium
- Combined EiQ rice sourcing and country risk: high
- Combined EiQ rice sourcing and country risk: extreme

Rice source countries	Combined EiQ rice sourcing and country risk
Australia	High
Argentina	High
Cambodia	Extreme
China	High
India	Extreme
Italy	High
Pakistan	Extreme
Spain	High
Taiwan	High
Thailand	High
Uruguay	High
United States	High
Vietnam	Extreme

Potential risks of modern slavery in the Group’s supply chain

Table 4: Potential risks of modern slavery in the Group’s supply chain

Goods and services	Key risk factors	Risk mitigating actions/controls
Processed and/or packed rice Contract manufactured finished goods (e.g. rice foods, jarred fruit, bakery goods and vegetables)	• Reliance on vulnerable or at-risk workers, including lower skilled, casual, seasonal, migrant and younger workers, which may lead to exploitative employment practices or precursors of modern slavery. • Seasonal or peak production demands may increase risks associated with excessive or involuntary working hours. • Use of labour hire providers may increase exposure to misleading or exploitative recruitment practices, including debt bondage or forced labour. • Risks to people working in logistics, including international sea freight, road transport and warehousing. Seafarers in particular may face risks including recruitment fees, wage non-payment and excessive hours, heightened by sub-contracting and the limited leverage companies hold over vessel operators. • Limited transparency in some rice supply chains may increase risks associated with exploitative employment practices or precursors of modern slavery. • Geographic-related risks associated with the location of the facility (see page 11).	• Governance, policy and accountability: The Group’s policies and governance arrangements support oversight of human rights and modern slavery risk management (see pages 14 to 15). • Risk assessment and due diligence: Supplier segmentation, supplier screening and other due diligence processes and tools are used to assess and prioritise supplier risk (see pages 19 to 20). • Controls and monitoring: Employee training supports identification and escalation of modern slavery-related risks (see page 21); grievance mechanisms are made available to suppliers; supplier risk is monitored through relevant processes and tools, including social and ethical audits. • Logistics: The Group is strengthening its understanding of modern slavery risks in logistics and transport, particularly sea freight, and will consider these risks in its approach to supplier due diligence.
Labour hire companies	• Reliance on vulnerable or at-risk workers, including lower skilled, casual, seasonal, migrant and younger workers, which may lead to exploitative employment practices or precursors of modern slavery. • Risks related to misleading recruitment, identity documentation retention and the charging of recruitment fees which have the potential to lead to debt bondage. • Inconsistencies between international labour rights standards and domestic laws in some sourcing countries can lead to risks such as deceptive recruitment, forced labour and debt bondage.	• Governance, policy and accountability: The Group’s policies and governance arrangements support oversight of human rights and modern slavery risk management (see pages 14 and 15). • Risk assessment and due diligence: Supplier screening and other due diligence processes and tools are used to assess and prioritise supplier risk. This includes the harvest risk assessment (see page 18). • Controls and monitoring: Employee training supports identification and escalation of modern slavery-related risks (see page 21); workers engaged through labour hire receive relevant training on workplace rights and grievance mechanisms; risks are monitored through processes including the Labour Hire Checklist, contracts and SMETA audits (see pages 17 to 18).



Assessing and addressing our modern slavery risks

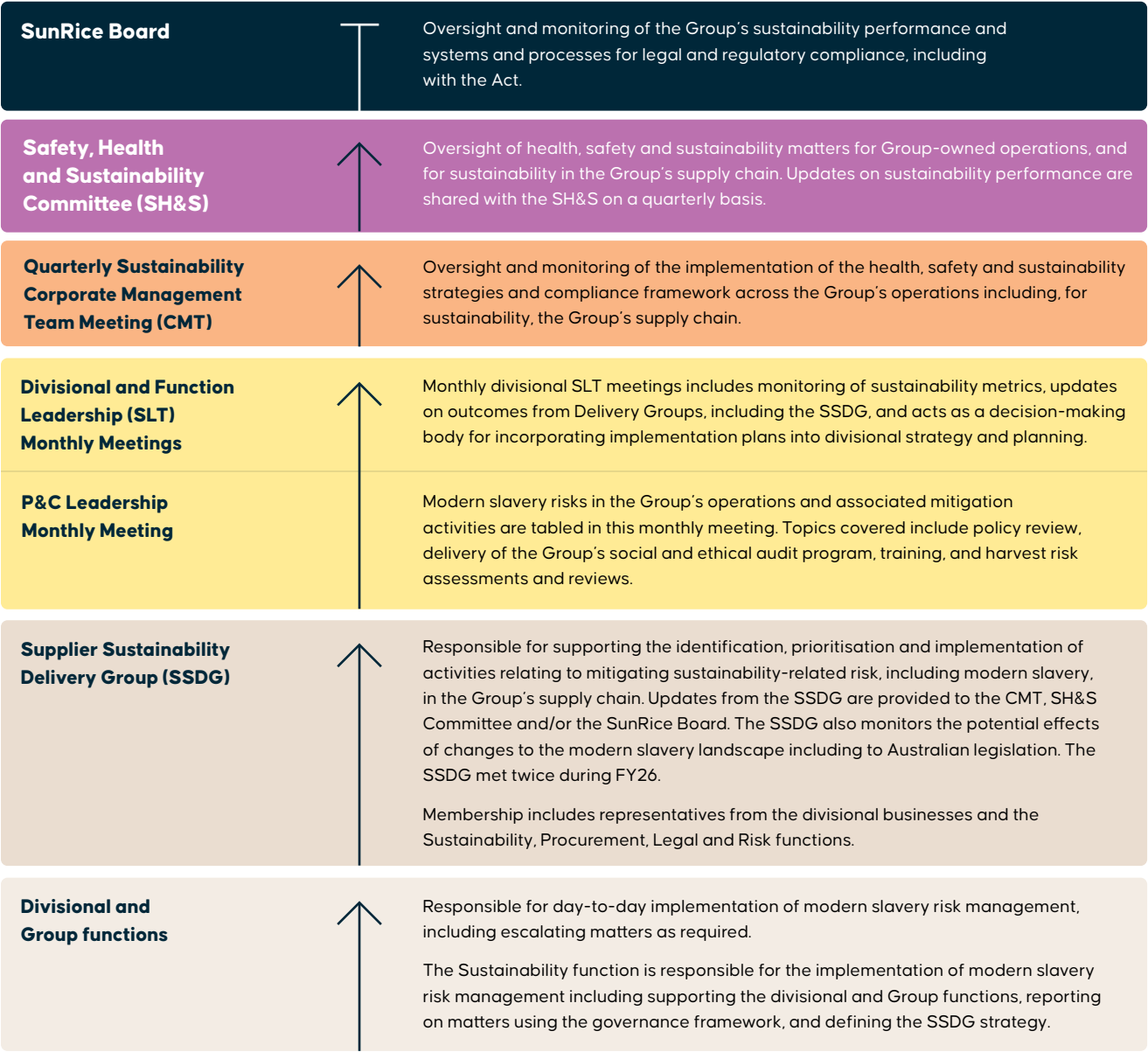
Governance

The SunRice Board is committed to ensuring the Group’s corporate governance frameworks, policies and practices are of the highest standard.

This commitment is delivered through continuous improvement, with the Group’s approach to governance and accountability of sustainability-related matters evolving with emerging trends and changing stakeholder expectations.

During FY26, a new sustainability governance framework was introduced to support implementation of the Group’s Sustainability Strategy. As part of this framework, the Supplier Sustainability Delivery Group (SSDG) was established, replacing the Supplier Sustainability Program (SSP) Steering Committee. While the SSP focused on modern slavery risk management across the Group’s operations and supply chain, the SSDG focuses on supply chain risk management across a broader range of sustainability topics, including modern slavery. During FY26, operational modern slavery risk management was overseen through several governance forums, including the monthly P&C Leadership meetings. The purpose of the SSDG and P&C meetings are outlined in more detail on the right.

Figure 2: Governance framework for modern slavery risks at SunRice Group



Policies

SunRice Group has a range of policies that are part of the Group’s governance framework and relevant to modern slavery risk management.

These policies are endorsed by the CMT, with certain Group-wide policies requiring SunRice Board approval. Policies support SunRice to operationalise its approach to modern slavery risk management and to clearly communicate its expectations to its employees, suppliers and broader stakeholders. The following list of policies are relevant to the Group’s approach to modern slavery.

SunRice Group Sustainability Policy

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

Implementation

Approved by the Board in June 2025.

Human Rights Statement

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

Implementation

Endorsed by the CMT in June 2025. In FY26, awareness of the Statement was raised among employees through internal channels.

SunRice Group Code of Conduct

Defines the standards, values, and behaviours expected at SunRice, including the Group’s 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

Mandatory training on the Code of Conduct is provided to all employees 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.

SunRice Group Speak Up Policy

Governs the Group’s whistleblower mechanism and processes, and clearly defines the 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 people, including employees, contractors, supply chain workers and those who come into contact with the Group’s operations.

Implementation

Available on the Group’s website in English, Vietnamese, Arabic, and Tok Pisin. 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 the local language. Ambassadors are available to provide workers with an option of raising issues with a trusted internal representative.

Information is also included in the Group’s Employee Handbook.

Case study:

Embedding the SunRice Group’s Supplier Sustainability Code

The Supplier Sustainability Code supports SunRice Group’s approach to identifying, preventing and responding to modern slavery risks across its supply chain. An area of focus during FY26 was strengthening understanding of the Code for SunRice employees and suppliers.

To support supplier understanding of the Group’s requirements, Supplier Sustainability Code Guidelines (Guidelines) were developed, and the Code and Guidelines were translated into eight languages. The Guidelines provide practical assistance to suppliers on implementing the Code and have been designed to improve supplier capability to identify, prevent and manage labour rights risks within their operations and supply chains.

A supplier training video was also released to explain the Code and increase awareness of the Group’s Speak Up mechanism. Together with a new employee eLearning module launching in FY27, these initiatives are intended to strengthen awareness of modern slavery risks, improve the identification and escalation of potential concerns, and build capability to engage suppliers on labour rights issues.

By improving understanding, accessibility and engagement, the Guidelines and videos support more effective due diligence and contribute to the Group’s broader efforts to reduce modern slavery risks across its supply chain.

Next steps

During FY27, SunRice will continue to strengthen capability across employees and suppliers to identify and manage modern slavery risks. Activities will include ongoing communication of the Code, Guidelines and training materials to suppliers; launch of the new employee eLearning module; targeted training for key functions; and direct engagement with priority suppliers to support implementation of the Code (see page 19 for information on priority suppliers).

Policies

SunRice Group Labour Rights Standards Policy

Outlines the Group's commitment to the International Labour Organization's (ILO) Core Conventions, including the Forced Labour Convention, 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105). This includes reference to freedom of association, forced labour and human trafficking, child labour, working hours, wages and benefits, servitude, diversity and inclusion.

Implementation

Retired in FY26 following a review. The review identified that all topics governed by the Policy were addressed in other policies.

SunRice Group Supplier Sustainability Code

Outlines the 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. The Code is supported by the SunRice Group Supplier Sustainability Code Guidelines.

Implementation

See the case study on page 15 for information regarding implementation of the Code.

Clauses requiring suppliers to adhere to the Supplier Sustainability Code are included in most of the Group's contracts.

SunRice Group Supplier Sustainability Code Guidelines (new)

The Guidelines support suppliers' understanding of the standards set out in the Group Supplier Sustainability Code and support practical implementation of the Group's expectations.

Implementation

See the case study on page 15 for information regarding implementation of the Code.

Group Procurement Policy (internal)

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, including 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

Communicated to relevant internal team members through team meetings and site visits. The Group Procurement team also participated in a refresher training session to ensure ongoing implementation of the Policy.

Emily Yoo, Senior Legal Counsel and
Mark Aitken, Group Design Manager.

Grievance Policy (internal)

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 only applies to employees.

Implementation

Available to employees via the Group's intranet.

During FY26, a review of the Policy was completed, and it was further aligned to the UNGP's effectiveness criteria for company operated grievance mechanisms and extended to include all employees globally.

In FY26, awareness of the Policy was raised among Australian employees through internal channels. Awareness raising for the Group's global employees will be a focus area for FY27.

Child Labour Remediation Guideline (internal)

Outlines SunRice's 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 their employment and supporting the child to access schooling.

Implementation

Available to employees via the Group's intranet.

Labour Hire Checklist

Provides guidance for internal stakeholders on cyclical checks to be undertaken with labour hire providers, and steps to follow where issues are identified and remediation may be required.

Implementation

Piloted at CopRice Wangaratta and Gogeldrie Australian Grain Storage (AGS) during FY26.



Operational risk management

SunRice Group has several activities and controls in place to mitigate modern slavery risks in the Group’s operations.

Figure 3: FY26 SMETA audit findings status¹³



Operational social and ethical audit program

The Group’s approach to strengthening modern slavery safeguards, along with other risk mitigants outlined in Table 3, is supported by its operational social and ethical audit program.

The standardised, cross-functional approach that SunRice takes to the delivery of the program assists with the identification and assessment of modern slavery-related risks. The approach is outlined in the column to the right.

During FY26, social and ethical audits were conducted at the Group’s Leeton Mill, Leeton Specialty Rice Food Group (SRFG) site, CopRice Wangaratta, and the Gogeldrie AGS depot. No issues related to modern slavery were identified during the audits. Further information on the audit at Gogeldrie AGS in relation to mitigating risks associated with labour hire providers and working hours during harvest can be found on page 18.

As shown in Fig 3, SunRice continued to proactively address and close out audit findings during the reporting period, including through corrective action plans for audits conducted in FY26, and findings from previous audits. These actions included strengthening the recording of working hours and the monitoring of overtime at the Group’s Vietnam Mill by embedding relevant processes into ways of working and providing additional training to key employees. The next audit of the Group’s Vietnam Mill is scheduled for FY27.

Social and ethical audit process

Audit readiness and employee engagement

Site risk assessments and workforce characteristics inform the Group’s social and ethical audit program. To maintain ongoing audit readiness, site leaders and key Group function roles receive training on labour rights expectations and the Group’s approach to audits. Employees participate in awareness raising activities that reinforce labour rights standards, available grievance mechanisms and their role in identifying and raising concerns. Workforce composition is reviewed to understand any considerations for the audit process, including language or cultural considerations.

Independent social and ethical audits

Qualified independent auditors conduct social and ethical audits using the SMETA 4-Pillar methodology. Audits include site inspections, document reviews and confidential worker interviews to assess compliance with labour rights requirements and identify opportunities to strengthen practices and controls.

Corrective action planning and remediation

Audit findings are reviewed by site and Group representatives to identify root causes, assign accountability and implement corrective actions. Action plans are developed to address identified issues, strengthen management systems and support ongoing compliance with labour rights expectations.

Monitoring, governance and continuous improvement

Audit findings and corrective actions are monitored through to completion, with progress reviewed through relevant management and governance forums. Audit insights are used to identify recurring issues, emerging risks and opportunities to strengthen policies, processes, training and controls across the Group. Material matters are escalated through established governance channels as appropriate.

13. Chart represents audits conducted in FY26 and the close-out status as at 30 April 2026.

Operational risk management

Mitigating risks associated with labour hire providers

SunRice Group engages labour hire providers to support its operations in the US and Australia on an ad-hoc basis to cover short-term needs or during seasonal periods such as harvest.

The Group’s primary use of labour hire is during the Australian rice harvest. During the reporting period, SunRice engaged 42 individuals for the harvest season through a labour hire provider that holds a long-term, strategic relationship with the Group. In the US, individuals engaged through labour hire account for ~10% of the workforce (on average across the year). As noted on page 10, the use of labour hire providers may give rise to modern slavery and labour rights risks.

To help manage these risks, SunRice Group agreements with labour hire providers include specific modern slavery clauses and related provisions requiring labour hire providers to ensure that workers have the appropriate skills, training and qualifications for their roles, the legal right to work in Australia, and that they complete any training required by the Group.

During the reporting period, the Group completed an internal review of its Labour Hire Engagement Procedure and identified an opportunity to strengthen the way labour hire-related risks are monitored and managed. In response, the Procedure was retired and SunRice developed a Labour Hire Checklist to support more consistent oversight and risk mitigation.

Mitigating risks associated with working hours for seasonal work

The seasonal nature of agricultural-linked operations, particularly during harvest, can increase risks related to working hours and fatigue.

Labour shortages and seasonal worker preferences for additional hours to increase their income can add complexity to how SunRice manages these risks. SunRice Group continues to monitor working hours across its operations and strengthen controls where required.

As noted in previous Statements, SunRice established a cross-functional working group to better understand and manage risks related to harvest working hours in Australia. The working group met following the 2025 rice harvest season and before the start of the 2026 harvest, with the session held in 2025 also including a representative from the Group’s long-term Australian labour hire provider.

The working group reviewed existing controls, including fatigue management protocols, tools for tracking hours and days worked, planning for seasonal labour requirements (hired through the Group’s established labour hire provider) and processes for reporting instances where longer hours were worked. The Group also reviewed the controls and assurance mechanisms maintained by its Australian labour hire provider engaged for harvest to assess the management of modern slavery risks and support compliance with workplace laws and ethical employment standards. This included provision of Fair Work information to casual workers and access to grievance mechanisms.

An overview of progress during FY26 is provided aside.

Progress update:
FY26 focus on mitigating risks during harvest

Key actions that were identified in FY25 to further strengthen processes and related actions are outlined in the table below.

Action	Progress
Conducting an annual risk assessment prior to harvest	A risk assessment was completed with input from the cross-functional working group, which identified potential risks and assessed relevant controls.
Enhancing fatigue policies and associated guidelines	New procedures, risk assessment tools and guidelines were introduced to support fatigue management. These documents provide guidance on how to recognise fatigue, what to do if an individual is experiencing fatigue, and specific details relating to fatigue during the harvest season.
Ensuring early engagement with the labour hire provider to confirm their understanding of requirements and to assess controls	Labour hire requirements are shared with SunRice’s long-term labour hire provider well in advance of the harvest period. This allows time to engage workers for the season, assess specific risks (e.g. understand where workers are located in relation to the Group’s AGS sites) and mitigate these risks (e.g. consider longer hours due to travel time, whether workers have worked on site previously, and their training requirements).
Conducting an audit at Gogeldrie AGS	No issues related to working hours or fatigue management were identified through the SMETA audit at Gogeldrie AGS. The auditor noted that workers understood risks and felt comfortable reporting any issues if required.
	The Labour Hire Checklist was piloted during the audit to act as a control for risks related to labour hire engagement.

Supply chain risk management

Supplier segmentation

During FY26, SunRice Group enhanced its supplier risk assessment and segmentation approach to better identify high risk suppliers and prioritise due diligence and engagement.

The Group’s previous supplier segmentation approach categorised suppliers into four segments based on the inherent risk (informed by the EiQ platform, which considers factors such as geography, sector, product, services and labour and modern slavery-related risks) and supplier spend. While this approach provided a useful foundation, spend with suppliers is only one indicator of the leverage SunRice may have to influence supplier practices and drive change.

A review, carried out through the SSDG, identified an opportunity to adopt a more targeted approach to segmentation (see Fig. 4), focusing on supplier categories where there is a heightened risk of adverse human rights impacts and where the Group’s leverage is greatest. Leverage was informed by multiple factors including identification of the Group’s primary business activities, future growth projections and existence of strategic relationships. The SSDG aligned on paddy rice processing and packing, and food contract manufacturing as priority categories.

This assessment was then applied to identify a priority supplier list within these categories. An understanding of leverage was further strengthened through consideration of ease of changing suppliers, alignment of the supplier with the Group’s strategic goals, total expenditure with the supplier and the supplier’s potential to grow as SunRice develops new products and/ or expands its existing range. This enhanced approach will support more meaningful supplier engagement and targeted due diligence, capability building and risk mitigation.

In FY27, the Group will take a phased approach to embedding modern slavery risk controls into supplier management processes relevant to priority suppliers. This will include strengthening supplier life cycle processes, due diligence and escalation pathways, risk identification tools for site visits and new product development (NPD) guidance, while building internal and supplier capability. Each supplier’s maturity will vary, and this will influence how activities are phased.

Sustainability considerations, including modern slavery, will continue to be embedded for other high-risk goods and services through the Group’s supplier screening process (see page 20).

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 the Group’s potential leverage allows SunRice to identify where it can drive the greatest impact and informs its approach to supplier engagement.

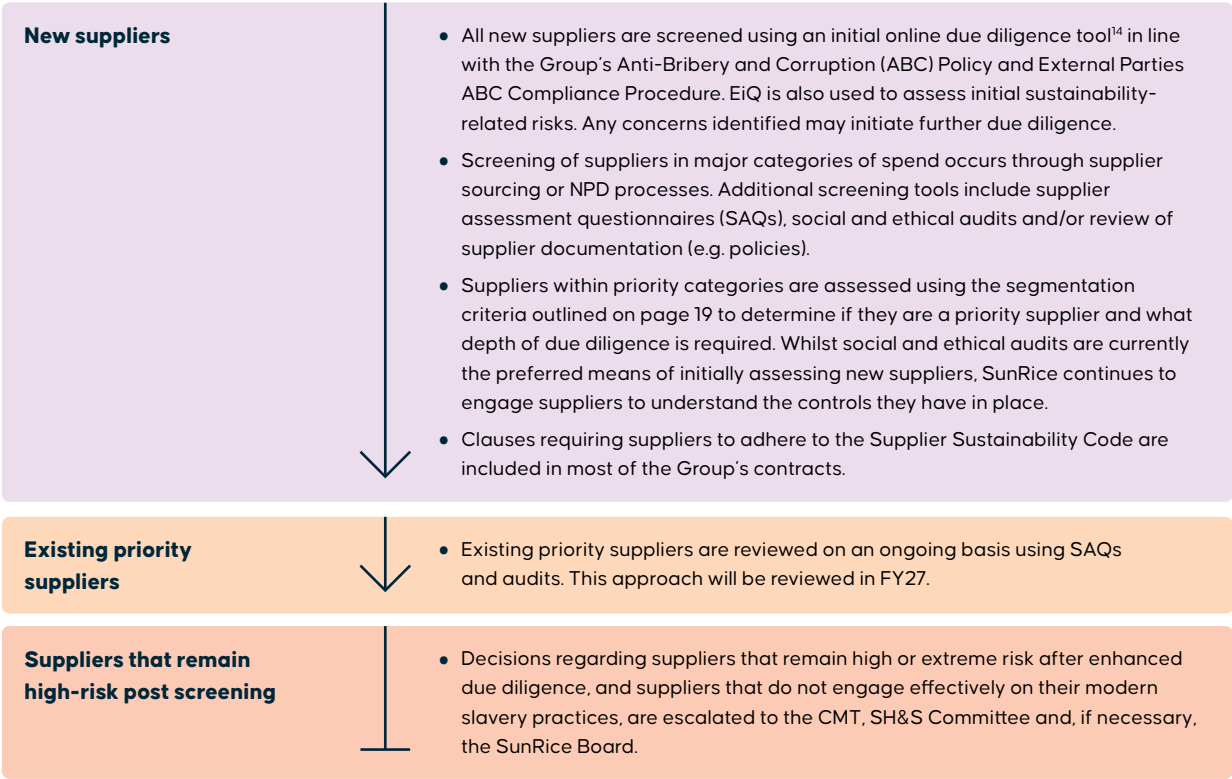
Leverage can come in many forms, for example, traditional commercial leverage which sits within the activities a company routinely undertakes in commercial relationships, such as contracting, or broader business leverage that a company can exercise through non routine activities, such as supplier capability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

Figure 4: Approach to supplier segmentation



Supply chain risk management

Supplier screening



Embedding modern slavery risk considerations into New Product Development (NPD)

SunRice Group continued to embed sustainability considerations, including modern slavery, into NPD processes during FY26.

The International Consumer Packaged Goods division’s NPD process uses an online project management tool to manage product development from concept to market. In FY26, this process was extended for use across the ANZ Consumer Packaged Goods division, formalising sustainability-related considerations into the NPD process. As part of the approval process to progress a product to the next stage of development, the Sustainability function undertakes a sustainability risk assessment focused on the product’s supply chain, including consideration of modern slavery-related risks. The outcome of the assessment informs any further action that may be required, including additional due diligence, engagement with suppliers on risk mitigation strategies, and/or escalation to the CMT for further consideration.

This process supports early identification of potential modern slavery risks, more consistent due diligence processes across the business segments and increased capability among internal teams to recognise potential human rights risks. It also supports the broader embedding of sustainability considerations into business activities.

14. The online due diligence tool screens for politically-exposed persons, state-owned entities, regulatory and law enforcement activity, adverse media and sanctions.

Supply chain risk management

Responses to changes to rice supply

In response to Australia’s recent drier conditions and evolving policy landscape, SunRice continued to diversify its rice sourcing capability during the reporting period, with the harvest of the Group’s first commercial rice crop in South America.

A cross-functional team conducted risk assessments on new suppliers in these countries, which included sustainability-related matters such as labour rights, the demographics of workers, health and safety, and modern slavery-related risks.

The Group also continued the assessment of suppliers in a high-risk jurisdiction using third-party audits at two potential suppliers’ sites related to the supply of rice. SunRice has been working collaboratively with these suppliers to address the findings, recognising that some corrective actions may be influenced by country-specific operating contexts. Corrective actions have been developed, and close-out of findings is in progress. Findings identified through the audits included matters relating to working hour records, fire safety mechanisms and chemicals management.

Training

Building capability across the Group is central to SunRice’s approach to managing modern slavery risks.

The Group’s training modules are designed to help employees understand modern slavery risks, SunRice’s expectations and how these relate to their roles and responsibilities. In FY26, the audience for the Group’s forced labour e-learning module, *Recognising the risks of Modern Slavery*, was expanded to all employees globally.

Recognising the risks of Modern Slavery

This module provides an overview of modern slavery, including its prevalence, indicators and key risks for the SunRice business. This module is mandatory for all permanent employees and must be completed every two years.

92% compliance with the Group’s forced labour module (based on those it was issued to)



SunRice Lap Vo Health and Safety Manager **Nguyen Duc Hien Tran** instructs team members on the use of a new fire system.



Trukai team members **Jeffery Karifia**, **Abalone Keith** and **Wera Waru** at the Site 1 distribution bay, Lae.

Understanding SunRice’s 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.

This module was discontinued in FY26 in advance of the release of the updated eLearning module (see page 15).

ETI Base Code training

ETI Base Code training is delivered to on-site teams undergoing social and ethical audits. Using practical examples, training is delivered before each audit to explain the principles of the ETI Base Code, including the workplace standards that workers are entitled to under the Code, to outline the audit process, and to ensure that workers understand that they can speak openly during interviews and that information will be treated confidentially.

P&C leaders across the business also participated in training on the ETI Base Code to enable better understanding of areas assessed during SMETA audits.

Collaboration and engagement

SunRice engages with a range of stakeholders to inform and strengthen its approach to identifying, assessing and managing modern slavery risks.

These engagements support peer learning, awareness of emerging risks and stakeholder expectations, and continuous improvement in due diligence, remediation and reporting. The table on the right outlines key engagements during the reporting period.

Organisation	Key stakeholders	Overview
United Nations Global Compact (UNGC)	Business, civil society and government	SunRice has been a participant of UNGC since 2018, including the UN Global Compact Network Australia. During the reporting period, SunRice continued to engage in human rights-related initiatives, including the Modern Slavery Community of Practice, the Business and Human Rights Accelerator Program and the annual Dialogue on Business and Human Rights.
Office of the Australian Anti-Slavery Commissioner	Business and government	SunRice engaged with the Office of the Australian Anti-Slavery Commissioner through practitioner discussions on the implementation of the Act and consultations on the Commissioner’s inaugural Strategic Plan.
Office of the NSW Anti-Slavery Commissioner	Business, civil society, government and people with lived experience	SunRice attended the NSW Anti-Slavery Commissioner’s 2025 Annual Modern Slavery Forum, which brought together diverse stakeholders to discuss modern slavery prevention and response.
Australian Government	Business, civil society and government	SunRice’s Group Sustainability Director participated in the Modern Slavery Expert Advisory Group, which offers insights to the Australian Government on the practical application of the Act to inform the operation and continuous improvement of the Act, targeted reporting guidance and business engagement.
Customers	Customers	SunRice engaged with customers globally on modern slavery-related requirements and expectations across its value chain.
Suppliers	Suppliers	SunRice engaged with suppliers through its broader due diligence activities. Further information on the Group’s supply chain profile and supplier engagement is provided on pages 12, 13, 19 and 20.
SEDEX	Multi-stakeholder	SunRice attended the SEDEX Members Forum, supporting cross-industry learning on supplier self-assessment questionnaires, SMETA audits and other social and ethical due diligence tools.
EiQ	Multi-stakeholder	SunRice attended the EiQ World Series Forum, which provided insights on emerging country and labour rights risks, the use of multiple data sources, and tools to support supplier onboarding, risk assessment, monitoring, remediation and reporting.

Grievance mechanisms and remediation

Overview of the Group's grievance mechanisms

SunRice Group recognises the importance of accessible and trusted grievance mechanisms in identifying and responding to potential human rights and modern slavery concerns.

The Group's primary mechanism for reporting concerns relating to human rights, labour exploitation and modern slavery is through its Speak Up whistleblower mechanism. Further information on SunRice's Speak Up Policy, mechanism and processes and how it is promoted can be found on page 15. Speak Up provides a confidential reporting channel for eligible individuals, including employees, officers, contractors, consultants, suppliers, business partners and workers in SunRice Group's supply chain. Reports can be made verbally or in writing, including through an independently administered hotline that is available 24 hours a day, seven days a week and allows anonymous reporting.

Concerns that may be raised through Speak Up include suspected breaches of law or SunRice Group policies, including its Code of Conduct, Anti-Bribery and Corruption Policy and Supplier Sustainability Code, as well as concerns relating to human rights, labour exploitation or modern slavery.

Employee-specific workplace grievances may also be raised and resolved through processes outlined in the SunRice Group Grievance Policy. Where a workplace grievance indicates broader misconduct or a potential breach of policy, including a human rights or modern slavery-related concern, the matter may be escalated through Speak Up.

Speak Up reporting data is provided twice a year to the Finance, Risk and Audit Committee (FRAC) of the Board by the Integrity Officer. This reporting data includes key issues and themes arising from reports received, while taking steps to protect anonymity. In FY26 one of the reports received via the grievance mechanism was identified as potentially being connected to modern slavery. On investigation, it was determined not to relate to modern slavery. The Group will continue to monitor grievance data for indicators of human rights-related concerns, including modern slavery.

Commitment to remediation

If SunRice identifies a modern slavery related incident in its operations or supply chain, it will be investigated. SunRice's response (including the use of leverage with business partners and its role in any remediation) will depend on a range of factors including SunRice's level of involvement.

In line with the UNGPs, SunRice Group is committed to providing for, or cooperating in, effective remediation where it's identified that the Group has caused or contributed to modern slavery. If it's identified that SunRice is directly linked to modern slavery, the Group will seek to use its influence to play a role in remediation.



Assessing the effectiveness of our approach

Effectiveness of the Group’s FY26 actions

For the purposes of this year’s Statement, the table below is based on the Group’s previously stated long-term goals set out in its FY25 Statement.

Our Goals	Key outcomes in FY26	How this helps us to assess effectiveness
Embed robust governance systems for SunRice Group’s operations on human rights including modern slavery	• Implemented the Group’s refreshed sustainability governance framework, which includes a specific focus on human rights. • Delivered work to review, update and/or develop policies and guidelines, including the Group’s Grievance Policy, Labour Hire Checklist and Supplier Sustainability Code Guidelines. • Convened two meetings of the SSDG. • Embedded sustainability in P&C Leadership Monthly Meetings, focusing on risk management in the Group’s operations.	Through the SSDG and the P&C Leadership Monthly Meeting, key actions taken to address modern slavery are reviewed, including the Group’s audit plan, to understand how well modern slavery risk is managed. Reviewing its governance framework and policies helps the Group to evaluate whether they remain fit-for-purpose, including as SunRice’s operating environment evolves. This has led to an update of a number of policies, guidelines, procedures and frameworks across SunRice Group during FY26.
Implement a social and ethical audit program at SunRice Group sites that prioritises sites based on human rights-related risks associated with Group operations	• Four SMETA audits were conducted at the Group’s Leeton Mill, Leeton SRFG facility, CopRice Wangaratta facility and AGS Gogeldrie depot. • 70% of FY26 audit findings have been closed.	Audits assist the Group in assessing if it has consistent compliance with local legislation and the ETI Base Code across its operations. Audits also help the Group to identify opportunities to work with business partners to improve policies and practices to address identified non-compliances. By strengthening its modern slavery risk identification and assessment processes it helps the Group to understand the extent to which expectations are being implemented by its employees and suppliers.

Effectiveness of the Group’s FY26 actions

Our Goals	Key outcomes in FY26	How this helps us to assess effectiveness
Minimise the risk of labour rights abuses in the Group’s operations and supply chain	- Enhanced the Group’s approach to identifying priority focus areas in its supply chain for modern slavery risk management. - Progressed the Group’s approach to harvest-related labour rights risks, including risks associated with longer working hours and labour hire. - Further embedded modern slavery risk identification and assessment into International Consumer Packaged Goods and ANZ Consumer Packaged Goods divisions’ NPD processes through extension of a project management tool. - Expanded roll out of the <i>Recognising the risks of Modern Slavery</i> eLearning module to all Group employees. - Worked with 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 those related to human rights, in merger and acquisition (M&A) processes and new country entry.	Strengthening the Group’s modern slavery risk identification, assessment and segmentation processes helps it to refine its focus to key risk areas and, as a result, monitor progress.
Build internal capability to identify and remediate issues as they arise	- Delivered training on the ETI Base Code to employees at sites audited in FY26 and to P&C leaders, including providing information on how to raise a concern through Speak Up. - Developed a new Supplier Sustainability Code eLearning module for employees and explainer video for suppliers. - 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.	Providing modern slavery training helps SunRice to strengthen the capability of its people to identify and report modern slavery risks. Monitoring reports from Speak Up and other channels enables SunRice 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 the Group identify opportunities to keep improving its approach.
Foster open and trusted supplier relationships to identify and remediate labour rights issues across the Group’s supply chain	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.	Engaging with suppliers and other business partners provides SunRice with feedback on where its approach is working and where it has opportunities to improve.

Our Horizon Goals and FY27 planned activities

The Group has refreshed its modern slavery goals to align with its 2030 Growth Strategy and strengthen its response to evolving human rights risks. These goals recognise the increasing diversity of the Group’s supply chain, the changing global legislative landscape, increasing customer expectations on social and ethical performance, and the Group’s commitment to making a meaningful impact. Consistent with the requirements of the Act, the goals are designed to support continuous improvement and enhance the Group’s ability to assess, address and report on the effectiveness of its approach to managing modern slavery risks across its operations and supply chain. The table to the right outlines SunRice’s Horizon Goals, the long-term ambition and FY27 activities connected to the horizon goals.

Horizon Goals	Long-term ambition	FY27 planned activities
1. Strengthen governance to effectively monitor existing and emerging risks	Governance that supports timely identification, assessment, escalation and monitoring of existing and emerging modern slavery and labour rights risks and enables review of the effectiveness of the Group’s approach.	Strengthen governance and oversight of the Group’s modern slavery approach by reviewing relevant forum responsibilities, aligning governance with the Group’s Sustainability Strategy and emerging risk trends, and identifying practical measures to assess the effectiveness of the Group’s approach.
2. Embed modern slavery risk controls into supplier management and business growth processes	Modern slavery risk controls are integrated into relevant supplier management and business growth processes, with focus on higher-risk suppliers, sectors and sourcing decisions.	Embed modern slavery requirements into supplier management and business growth processes, including supplier life cycle processes, due diligence and escalation pathways for higher-risk suppliers and sourcing decisions, risk identification tools for site visits and NPD guidance. Build capability of selected suppliers and internal teams to support embedding the Group’s Supplier Sustainability Code.
3. Deepen due diligence in priority risk areas	Priority risk areas are assessed through a structured due diligence approach, with actions informed by potential worker impacts, root causes, leverage and mitigation or remediation pathways.	Collaborate with key stakeholders to develop and begin implementing a due diligence plan for a priority risk area, setting out the objectives, intended outputs, existing controls, gaps and areas of leverage.
4. Strengthen operational modern slavery and labour rights controls	Operational labour rights risks are identified, monitored and addressed through risk-based audits, corrective action management and strengthened site-level controls.	Strengthen operational labour rights controls by delivering the FY27 social and ethical audit program, managing corrective actions and building capability across priority sites.
5. Improve grievance and remediation mechanisms	Workers in priority operations and supply chains have improved access to effective grievance mechanisms and remediation pathways.	Assess the effectiveness and use of the Speak Up mechanism in one of the Group’s operational sites, and continue to communicate the Group’s Speak Up mechanism to priority suppliers.

Consultation process

The development of this Statement was led by Group Sustainability with input from representatives from the Group's businesses, divisions and functions across the reporting entities. These representatives also provided data and supported the verification process for the Statement. The Statement was reviewed by the SSDG, the CMT and the SH&S Committee prior to being approved by the Board.

The ongoing development of the Group's Modern Slavery Statement, and its modern slavery risk management approach, includes cross-functional consultation with input from key areas of the business. SunRice understands that actively engaging with its employees builds internal alignment and is a fundamental component in developing robust programs and procedures.



Jacqui Vanderzeil,
Marketing Director -
Bakery & Condiments.



Regulatory disclosure matrix

This Statement was prepared to meet SunRice’s regulatory disclosure requirements and complements the disclosures found on the Group’s investor website and in its 2026 Annual Report. 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 to the right reference where within this Statement the mandatory criteria for the *Australian Modern Slavery Act 2018 (Cth)* are addressed 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	UK Modern Slavery Act	Disclosure reference
Mandatory criteria 1: Identify the reporting entity.		About this Statement (page 3)
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 5)
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 9)
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 about slavery and human trafficking available to staff.	Assessing and addressing our modern slavery risks (page 14) Grievance mechanisms and remediation (page 23)
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 24)
Mandatory Criteria 6: Describe the process of consultation with any entities that the reporting entity owns or controls.		Consultation process (page 27)
Mandatory Criteria 7: Any other information that the reporting entity considers relevant.		Appendix 1: Our owned and controlled entities (page 29)

Appendix 1: Our owned and controlled entities

Name of Entity	% of share	Place of incorporation
Ricegrowers Limited	100	Australia
Rice Research Australia Pty Ltd	100	Australia
SunRice Trading Pty Ltd	100	Australia
Riviana Foods Pty Ltd	100	Australia
Australian Grain Storage Pty Ltd	100	Australia
Roza's Gourmet Pty Ltd	100	Australia
KJ & Co Brands Pty Ltd	100	Australia
SunRice Australia Pty Ltd	100	Australia
Pryde's Tucker Bag Pty Ltd	100	Australia
Pryde's Easifeed Pty Ltd	100	Australia
Pryde's Easifeed NZ Ltd	100	New Zealand
Sunshine Rice Pty Ltd	100	Australia
Savourlife Pty Ltd	100	Australia
Savourlife IP Pty Ltd	100	Australia
Ricegrowers New Zealand Ltd	100	New Zealand
Ricegrowers Singapore Pte Ltd	100	Singapore
Ricegrowers Vietnam Company Limited	100	Vietnam
SunRice Trading (Shanghai) Co Ltd	100	China
Ricegrowers Middle East DMCC	100	UAE
Trukai Industries Ltd	66.23	Papua New Guinea
Rice Industries Ltd	66.23	Papua New Guinea
Trukai (Wholesale) Ltd	66.23	Papua New Guinea
Ricegrowers Limited Japan	100	Japan
Aqaba Processing Co	80	Jordan
Sunshine Rice Inc	100	USA
SunFoods LLC	100	USA
Solomons Rice Company Limited	100	Solomon Islands
Ricegrowers Uruguay S.A.	100	Uruguay

