

This is Harris Farm Market's opening Modern Slavery Statement, detailing the framework designed to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain.

Harris Farm Markets is committed to respecting human rights. Our mantra is '**for the greater goodness**' and our core principles are to do business with integrity, sustainability and fairness. We foster a culture of responsibility for and expect high standards of upholding compliance with human rights throughout our business, supply chains and the communities that we operate in. This includes a commitment to ensure that there is no modern slavery in our operations and supply chains, demonstrated by our progress described in this and subsequent annual Modern Slavery Statements reported under the Modern Slavery Act 2018 (Cth).



Policy Statement

Our Human Rights Policy is guided by the International Bill of Human Rights and the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. This statement describes the human rights most relevant to Harris Farm operations and is a foundation module of our Sustainability Plan which continuously improves our processes and business practices in response to stakeholder needs and expectations.

Harris Farm Markets has a zero-tolerance approach to all forms of human rights violations in its business, supply chain and local areas of operation. We are committed to supporting and respecting the protection of human rights and acknowledge that there is a risk of negative impacts on human rights through both our own business activities and businesses in our supply chains. We seek to prevent and mitigate adverse human rights impacts and will act with due diligence to ensure the rights of others are protected. We expect our suppliers and service providers to do the same.

We are committed to continuous improvement of our risk management processes, to deliver improved human rights to all participants in our business, be they customers, supplier workers, employees, contractors or local communities. Only by striving to improve will we break down the barriers to a better, more sustainable life for all.

Structure, Operations and Supply Chains**Harris Farm Markets Pty Ltd.**

Sydney Markets,
Flemington, NSW 2129
Main Reception: 02 9394 3111

A.C.N. 093 040 754
Registration date: 26/05/2000
Locality of registered office: SYDNEY NSW 2000

Structure:**OUR TEAM**

Total Staff Members: 2700
99% live local to place of work.

OUR SUPPLIERS

Total 1222
89 – Service Providers
1133 – Retail Suppliers

OUR LOCATIONS

Retail Operations in NSW and Queensland.
Procurement teams for fresh product, grocery and proteins in NSW and Queensland.
Logistics and Warehouse teams at 2 DC locations in NSW.
E-commerce team in NSW and Queensland.
Support Teams in NSW and Queensland.

Operations:

Harris Farm Markets is comprised of entities that undertake the following functions:

- Retail sales and service operations
- E-commerce
- Product manufacture and sourcing
- Digital, IT, data and media
- Supply chain distribution and logistics
- Property management and development

Supply Chain:

Our stores supply Australian fresh produce wherever possible, importing only specialist items not available in Australia and supplementary stock during low season.

All fresh meat is Grown in Australia.

Groceries and grocery ingredients are sourced from local suppliers where-ever possible, with a focus on supporting community providers and SME's.

Harris Farm Markets partner with more than 1200 vendors across food, liquor, and household goods categories, as well as non-trade supplies.

- Trade partners manufacture and supply branded products available for purchase in our bricks and mortar and online stores.
- A number of select suppliers manufacture and supply Harris farm branded products for sale in our stores and online business.
- Non-trade vendors supply resources, goods and services that support all operations, including IT hardware, building materials, transport and storage services, packaging and PPE consumables, cleaning services and supplies, and marketing materials and resources.

Our supply chain includes large Australian manufacturers, multinational manufacturing groups, and local small family businesses.

Human Rights Governance

Our human rights agenda is situated within the Harris Farm Markets Sustainability Plan and focusses on educating and supporting all team members to foster a strong, inclusive, diverse culture focusing for **goodness for all**.

Tools, processes, and subject matter experts are utilised to identify and act on modern slavery risks via the Sustainability Team, which encompasses members from all stakeholder groups.

Harris Farm Board

Responsible for approving the Modern Slavery Statement
Responsible for monitoring and providing oversight for Human Rights due diligence

CEOs & Senior Leadership Team

Accountable for managing Human Rights risks in all operations

Sustainability Team

Assesses risks, designs and implements mitigation strategies including due diligence & auditing monitoring programs

Quality Team

Manage responsible Sourcing Program including Vendor Assurance Program, vendor auditing and certification verification.

Board Oversight

The Harris Farm Markets Board oversee corporate culture and adherence to our values and provide guidance to the business on direction for continuous improvement plans, risk corrective actions, and reporting authorisation.

The Board meets atleast 6 times annually, including the annual Sustainability Review Meeting with Human Rights focus.

The CEO's and Senior Leadership Team are responsible for overseeing the Group's human rights program and makes recommendations to the Board.

The Harris Farm Markets Human Rights Policy describes the relevant scope and responsibilities.

- Review the effectiveness of Harris Farm Markets policies and initiatives to respect human rights across all business sectors via board reports prepared by the Sustainability and Senior Leadership Teams.
- Oversight of the Responsible Sourcing Policy and Standards
- Monitor and review of key human rights developments
- Make recommendations to the Board regarding the management of human rights issues.

Risk Assessment Process

Risk is assessed utilising a variant of Codex HACCP principles:

1. Conduct risk analysis:
 - a. Identify the hazards
 - b. Decide who might be harmed and how
 - c. Evaluate the risks
2. Determine points of risk control
3. Establish limits (what good looks like)
4. Establish monitoring/control systems
5. Establish Corrective Action
6. Establish verification procedures
7. Establish documentation

Mitigating and Remediating Risk

We place human rights culture as the prioritised first focus for our business when creating a strong risk management program.

Our management systems include policies, procedures and training/knowledge resources that encompass pertinent business expectations, work methods, and stakeholder monitoring and reporting. All are available to relevant stakeholders through electronic and hard copy media and are reviewed as per the management system review requirements (policies reviewed annually, other documents at minimum every 2 years). See Appendix A for list of relevant documents.

Risks identified during assessments are documented for:

1. Mitigating processes: individual control processes, control limits (what good looks like), measuring and reporting methods (procedures and nutshells in online management system).
2. Corrective action (remediating activities) including root cause analysis to determine why mitigation failed.

Supplier Risk Self-Assessment

Self-Assessment Surveys for sustainability indicators including Modern Slavery have commenced with low risk suppliers – food production facilities and local service providers that are registered and audited by local government authorities located within Australia.

Surveys are reviewed as part of the established Vendor Assurance program and deficiencies result in onsite audits or further investigation with likely mitigation/remediation outcomes.

Third party social compliance certification audits

Currently Harris Farm Markets recognises the Fair Farms Certification standard as adequate to meet minimum social compliance standards. Suppliers electing to use this certification standard will not be required to undergo self-assessment or auditing from Harris Farm Markets.

The Quality team review each audit report as part of the Vendor Assurance program and provide feedback on any points requiring further action. Suppliers not completing actions may be refused vendor approval.

Results

This table shows the **level of spend** and **risk likelihood** calculated with the SHDB and the literature review.

The categories with high to very high-risk likelihood are:

- Rice
- Other groceries
- Fruit and vegetables
- Working uniforms
- Beef
- Transport
- Poultry
- Sugar
- Vegetable oils and fats
- Nuts
- Beverages
- Poultry
- Fish



Category	Spend level	Risk likelihood
Rice	Low	Very High
Other groceries	High	Very High
Sugar	Low	Very High
Vegetables	Very High	Very High
Vegetable oils and fats	Low	Very High
Beverages	Medium	Very High
Nuts	Very High	Very High
Fruit	Very High	High
Working uniforms	Low	High
Beef	Very High	High
Transport	Medium	High
Poultry	Very High	High
Fish	High	High
Business services	Medium	Medium
Lamb	High	Medium
Cereal grains	Medium	Medium
Packaging	Medium	Medium
Electricity	Medium	Medium
Flowers and plants	High	Medium
Dairy	Very High	Medium
Waste	Medium	Low
Machinery and equipment	Very High	Low
Water	Low	Low
Pork	High	Low
Other meat	High	Low
Insurance	Low	Low
Financial services	Low	Low

Recommended high risk categories to prioritise

High risk categories to prioritise mitigation action in the next 12-18 months:

- Fruit and vegetables
- Other groceries
- Rice
- Sugar
- Nuts
- Working uniforms
- Beef
- Poultry
- Fish
- Low skilled business services: cleaning, security, trolleys



Categories	Risk Likelihood	High risk products/Ingredients	At risk countries currently sourced from
Rice	Very High	Rice	India
Other groceries	Very High	Tinned tomatoes	Italy
		Wheat	
		Eggs	
		Coffee	
		Cocoa	
Sugar	Very High	Sugar	Colombia
Fruits and Vegetables	Very High	Fruits and Vegetables	Australia
			United States of America
			Mexico
			New Zealand
			Thailand
			Vietnam
Nuts	Very High	Nuts	Turkey
			Bolivia
			Philippines
			Australia
Working uniforms	High	Textiles and clothing	
Beef	High	Beef	Australia
Poultry	High	Poultry	Australia
Fish	High	Fish and seafood	United States of America
			UK
			Indonesia

*Blank country designations mean variable locations to be managed.

Developed in conjunction with Edge Consulting

Table of Risk Indicators

Type of risk	Indicators
<p><u>Indicators of modern slavery</u> A combination of these signs may indicate a person is in a situation of modern slavery and that further investigation and assessment is required. You should also consider that some groups may be at higher risk of being impacted by modern slavery, such as women and migrant workers. For example, women can be disproportionately impacted by modern slavery due to structural disadvantages, including lack of access to education.</p>	<p>The suspected victim or victims are:</p> <ul style="list-style-type: none"> • living at the workplace, or another place owned/controlled by their employer • underpaid or not paid at all • required to work excessive hours • confined or isolated in the workplace or only leave at odd times • guarded at work or in their accommodation • isolated in remote locations that are difficult to access and/or restricted from contacting or interacting with people outside the workplace (for example, their phones are confiscated, or they are supervised when in public) • managed by an intermediary/third party who ‘holds’ or ‘invests’ money for them • subject to different or less favourable working conditions than other workers because of their country of origin, gender or other factors • unable to terminate their employment at any time • appear to be servicing a debt to an employer or third party (e.g. recruitment agent) • appear to be subjected to, or threatened with, violence, emotional, sexual, verbal or physical abuse and/or degrading treatment in connection with their employment • appear to be subjected to intimidation, such as threats to their family or close relations in connection with their employment • appear to have false travel or personal documents and/or are not allowed access to these documents because they are being held by an employer or third party • appear to have been deceived about the conditions of their employment • are not provided with contracts in language/format that they can easily understand • are not informed of, or do not appear able to understand the terms and conditions of their employment • are not provided with any protective equipment, training or means to refuse to participate in dangerous work practices, or refuse to handle known toxic materials or hazards • do not have permission to work because they are from another country or appear to be working in breach of visa requirements
<p><u>Industry Risks</u> Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.</p>	<ul style="list-style-type: none"> • Unskilled, temporary or seasonal labour, short-term contracts and outsourcing. • Use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at night-time or in remote locations, such as security or cleaning. • Use of child labour in hazardous conditions, such as underground, with dangerous machinery or tools, in unhealthy environments (including where they are exposed to physical or sexual abuse), or for long hours. • Recruitment strategies by suppliers, their agents or labour hire agencies target specific individuals and groups from marginalised or disadvantaged communities.

Type of risk	Indicators
<p><u>Product & service risks</u> Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.</p>	<ul style="list-style-type: none"> • Price vs cost or delivery timeframes require suppliers to engage in excessive working hours, cost savings on labour hire or rapidly increase workforce size. • Product/Service development/delivery reported to involve labour exploitation by international organisations or Non-Government Organisations (NGO). • Children used in the development of the product or delivery of the service, e.g. carpet weaving. • Product/components made in countries where there is a high risk of labour exploitation reported by international organisations or NGOs. • Services are provided in countries where there is a high risk of labour exploitation reported by international organisations or NGOs. • Product is made from materials or using services reported to involve a high risk of labour exploitation by international organisations or NGOs.
<p><u>Geographic risks</u> Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty. Several organisations issue public reports evaluating governance, corruption and rule of law in countries around the world. You can use these reports to identify higher risk countries for modern slavery.</p>	<ul style="list-style-type: none"> • Locale has not ratified international conventions relevant to modern slavery, such as: the International Convention to Suppress the Slave Trade and Slavery (1926); ILO Convention (No. 29) concerning Forced or Compulsory Labour (1930); the Supplementary Convention on the Abolition of Slavery, the Slave Trade and Practices similar to Slavery (1956); the Protocol to Suppress, Prevent and Punish Trafficking in Persons, Especially Women and Children (2000); ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (1999). • Country reported to have a high prevalence of modern slavery or labour rights violations, other human rights violations and/or child labour by international organisations or NGOs. • Community has inadequate protections for workers, including no or weak capacity to effectively monitor workplace standards and enforce compliance with national standards. Law enforcement agencies are reported to be hostile to workers in at risk industries. • The country forces parts of the population to work for development purposes, for example to assist in construction or agriculture. • The country is reported to have weak rule of law by international organisations/NGOs, including due to corruption, conflict, political instability. • The country has a high prevalence of people who are vulnerable to exploitation because they are impoverished, displaced or subject to severe discrimination
<p><u>Entity risks</u> Some entities may have particular modern slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.</p>	<p>Entity has previously been reported as noncompliant with human rights or labour standards, including by media or NGO sources.</p> <ul style="list-style-type: none"> • Procurement and sourcing processes are poorly managed or inefficient. • Entity has complex or opaque supply chains. • Workers appear to have little information about workplace entitlements and protections and there is a general lack of information about workplace standards. • Audit results for the entity appear unreliable or conflict with other sources of information about the supplier, such as NGO reports. • Staff recruitment costs by labour hire companies or recruiters are not covered by the company, meaning that recruitment expenses such as travel may be improperly imposed on workers. • Entity provides residential care for children overseas.

Risk Assessment: Sources of potential risk & examples of mitigating actions

Type of Human Right	Description	Example of Mitigation Action
Modern Slavery	Serious exploitation, where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom [2].	Vendor Assurance inspection or Fair Farms certification to check: Use of foreign workers on farms that supply Harris Farm do not allow onerous conditions that restrict workers' ability to leave by holding their visa obligations/ document possession as a negotiating tool to favour the grower's needs.
Child labour / minimum age workers / worst forms of child labour	The internationally recognised minimum age for work is 15 years (13 for light work) and 18 years for hazardous work). In NSW, there is no minimum age [7]. This varies per state in Australia. The worst forms of child labour include: exploitation through any form of slavery or practices similar to slavery, i.e. debt bondage and forced or compulsory labour, sexual exploitation or drug trafficking; and work which is likely to harm the health, safety or morals of children [1]. A child is considered as underage of 18 [1].	Assessment of vendors via Vendor Assurance program/Fair Farms Certification on use of child labour in hazardous conditions, such as dangerous manufacturing or farm machinery, in unhealthy environments or for long hours at produce growers.
Forced / bonded / compulsory labour	Forced labour occurs when the person cannot voluntarily cease working or leave their place of work [2]. Bonded labour occurs when the person's services are provided as security for a debt; where the debt is excessive to the length or nature of work, or the services are not applied to fulfill the debt [2].	Vendor Assurance inspection or Fair Farms certification to check no long hours, onerous or poor working conditions for foreign workers employed as seasonal labour to pick fruit in remote locations supplying Harris Farm. Seasonal workers on a working holiday (subclass 417) visa where they are required to fulfil visa obligations through remote work in Australia.
Indigenous and tribal people	Respect to indigenous and tribal people for their needs and desires. Access to their fundamental rights relating to their customs and traditions, land rights, the use of natural resources found on traditional lands, employment, vocational training, handicrafts and rural industries, social security and health, education, and cross-border contacts and communication [1].	Vendor Assurance Program: Harris Farm supply chain producers do not encroach or affect traditional lands with their farming practices, without consultation with the local tribal elders. Product Purchase: advocate for and support indigenous-owned product supply.
Non-discrimination	Equal opportunity and treatment relating to employment or occupation regardless of race, skin colour, sex, religion, beliefs, political opinion, ethnicity or social origin. [1]	Recruitment activities by Harris Farm & suppliers/service providers target individuals/groups from disadvantaged communities for manufacturing roles and cleaning services.
No harsh or degrading treatment / harassment / bullying	When a person or group of people repeatedly act unreasonably towards an individual/group of workers, creating a risk to health and safety [3].	Employee protection via cultural training for all staff, Employee Support programs, Stakeholder Grievance programs, Whistle-blower programs

Type of Human Right	Description	Example of Mitigation Action
Health and safety	Employees have the right to be protected from sickness, disease and injury arising from their employment [1].	Harris Farm provide personal protective equipment and WHS training to minimise the potential impact of injury or disease.
Working conditions - including working hours	Working conditions to be observed include regulated hours of work, weekly rest periods, annual holidays, night work and part-time work.	Creation of extra support processes: in extended & busy holiday periods request employees to work extended hours with reduced break times.
Fair wages / compensation	Workers are entitled to a regular payment of wages, the protection of wages in the event of the insolvency and guaranteed minimum wages.	Vendor Assurance inspection or Fair Farms certification to check rural growers supplying Harris farm: Pay minimum wage for seasonal labour, instead of using piece-meal picking employment conditions.
Freedom of association / collective bargaining / right to strike	The right to organise and form workers' organisations allows for fair collective bargaining [1]. Collective bargaining ensures that both employers and employees have an equal voice and that outcomes are fair and equitable [1].	Vendor Assurance assessment: free and fair access to union representation within supplier and service provision stakeholders.
Equality	Equal remuneration regardless of gender identification for work of equal value. Where remuneration includes ordinary or minimum wage or salary & any additional benefits payable to employee resulting from employment [1].	Harris Farm gap analysis of female worker earnings in comparison with male colleagues performing the same work and action plan to mitigate any gaps discovered.
Accessibility for persons with disabilities	Accessibility is where the needs of people with disabilities are specifically considered. Where products, services, and facilities are built or modified so that they can be used by people of all abilities [4].	Compliance audits by PPC team: Floor spaces and aisles are free of equipment and other barriers. Corporate Property Team: Design choices for property include accessible car parks close to shop entrances with sufficient space for mobility devices, compliance with building requirement for accessibility
Maternity protection	Maternity protection includes, but are not limited to: <ul style="list-style-type: none"> • Pregnant women and nursing mothers are not obliged to perform work which may be harmful to their health or their child. • Entitlement to a cash benefit that allows them to maintain themselves and their child to a suitable healthy, living standard. • Protection against discrimination based on maternity, including the prohibition of terminating employment of a woman during pregnancy, maternity leave, or during period following her return to work, except on grounds unrelated to pregnancy, childbirth etc. • Women returning to work must return to the same or an equivalent position paid at the same rate. [1] 	Equal Opportunity Policy audit: Comparison of position placements before and after maternity leave for compliance, with retraining and adjustments to meet criteria where nonconformances found.

Controls to assess and address risks, including due diligence & remediation processes

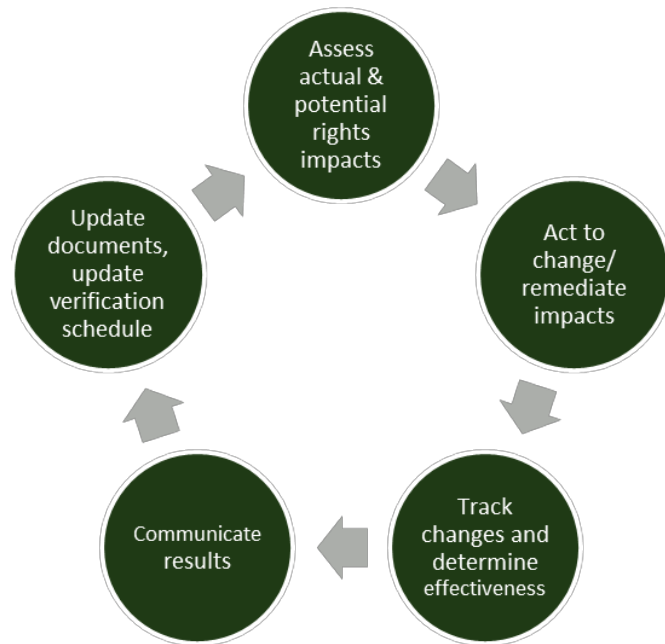
Remediation

Where a risk of modern slavery is identified, Harris Farm Markets will provide education, resources and support to staff, suppliers, and service providers to address the impacts and determine possible controls. Support will also be provided to assist local communities and third parties to address negative impacts as appropriate. Remediation activities are determined by the risk outcome and documented as corrective action in the risk assessment. This could include more intense/frequent verification activities or even termination of suppliers, subcontractors, and service providers dependent on significance of findings and capability of effectively managing the risk long term. Reports of remediation will be included in the Modern Slavery reporting for continuous improvement review.

Due diligence

Modern Slavery risk points are audited for compliance to the Sustainability Plan using the verification procedures established. The Quality team schedule and manage the compliance checks, work with teams to mitigate/mediate noncompliance, and report activities to the Senior Leadership team as part of Board reporting. Non-conforming verification results are reporting to Senior Leadership Team on discovery.

Harris Farm Markets will monitor modern slavery issues and their potential impact and consider the possible inclusion of relevant clauses in all aspects of our business as appropriate.



How mitigation effectiveness is assessed

Harris Farm Markets are striving to better understand the impacts our business has on human rights for all of our stake holders. We are keen to learn what effect our initiatives as outlined in this statement and wider scope Sustainability Plan will have in fostering greater goodness. We will take the learnings we gain as we track our progress and action them to refine our Sustainability Plan and further project implementations.

Data will be tracked, collated and analysed from

- Vendor Assurance program
- Supplier documentation
- Expert partner databases of product risks
- Government data on global human rights risks
- Internal measurements individual to risk assessments

Mitigation processes are included in Modern Slavery reporting for continuous improvement review.

Criteria	Action Performed	Monitoring/Measurement
Governance	<p>Board responsibilities</p> <p>Development of Human Rights Culture – training, behaviours, continuous improvement</p> <p>Document review – policies and public statements</p> <p>Vendor Assurance (including Responsible Sourcing Policy and Standards)</p>	<p>Agenda item at each Board Meeting</p> <p>Training completion %</p> <p>Audit assessment – behaviours rating improving</p> <p>Documentation complete %</p> <p>% Vendors assessments complete</p> <p>% Vendor contracts signed with Modern Slavery clauses.</p>
Risk Management	<p>Risk review – minimum annually or at change</p> <p>Mitigation corrective action plans implemented</p> <p>Mediation actions undertaken</p>	<p>% reviews on time</p> <p>% on time in full.</p> <p>Number & type, significance</p> <p>% with root cause identified and mitigated</p> <p>Number suppliers/service providers terminated</p>
Risk Monitoring & Reporting	<p>Risk control reporting</p> <p>Verification audits</p> <p>Major nonconformances raised</p>	<p>% on time & accurate</p> <p>% in time to plan</p> <p>Number & time to close out</p>
Corrective Action/Grievance Management	<p>Complaints/Grievances raised</p> <p>Remediation</p>	<p>Number, type, significance.</p> <p>Trend analysis over time</p> <p>% on time, root cause addressed.</p>

Future Plans

Harris Farm Markets is committed to continuously improving our modern slavery risk management program throughout our business operations and with all of our stakeholders.

2021 will be a year of intensive learning for our team and the end of year review will include refinements to risk assessment procedures, monitoring and verification programs and expansion to the categories in focus.

Appendix B has a copy of current 2021 plan

Appendix C has a copy of the 2022-23 plan

Appendix A – Document List


Document Number	Name	Function
POL004	Anti-Discrimination, Harassment and Bullying Policy.	Human Rights Culture – minimum standards
POL010	Code of Conduct	Human Rights Culture – minimum standards
POL017	Whistleblower Policy.	Call out process for procedural failures - internal
POL018	Grievance Policy	Stakeholder complaint processes for Human Rights failures
POL020	Diversity and Inclusion Policy	Human Rights Culture – minimum standards
STM002	Equal Employment Opportunity Statement	Human Rights Culture – minimum standards
PLN 002	Sustainability Plan	Planning tool and gap analysis document to identify and execute continuous improvement opportunities
P160	Sustainability Management & Reporting	Communications tool and standards setter for Sustainability criteria including Modern Slavery
P011	Internal Audits Procedure	Verification process for risk controls
P012	Stakeholder Complaints Procedure	Call out process for procedure failures - external
P015	Vendor Assurance Program including responsible sourcing	Minimum standards for vendor or service providers
P021	Food TACCP/VACCP	Risk analysis of product/raw material supply threats and potential impact on communities
P031	Verification Schedule	Scheduled assessment of control procedures
FRM 047	Modern Slavery Statement	Public communication of plan and results

Appendix B – Action Plan 2021

Focus Area	Actions	Detail	Timeframe	Complete
Corporate policy	Adopt Human Rights Policy incorporated into the code of conduct	Code of Conduct: Update the code to cover all types of modern slavery exploitation as per the Table of Risk Indicators including debt bondage and deceptive recruitment.	Immediate	Yes
	Update Supplier Agreement	Supplier Agreement (in development) updated to cover modern slavery requirements as per legislation.	Immediate	Final feedback
Risk Management	Prioritise areas of high risk and document the risk criteria	Build on the modern slavery risk assessment results and prioritise categories for modern slavery identify and prioritise where there is an ability to leverage suppliers or the areas where there is control & influence. Document the criteria that determines why the priority high risks categories or suppliers were chosen to focus on. Include a process for mitigation where these high-risk suppliers are prioritised.	Immediate	Yes – processes for influencing under review
Communications & Education	Introduce the topic to suppliers and communicate expectations	Distribute communication piece on topic of modern slavery to suppliers in the form of vendor letter & checklist, including the definition, context, expectations, and changes to Code of Conduct etc. New tender process and other onboarding processes of new suppliers will include all requirements.	Immediate	Underway, complete by end Q1 2021
Remediation	Develop a Grievance Mechanism	Develop a grievance mechanism and remediation plan for staff and suppliers. Communicate and promote this to suppliers and staff, make it available externally by publishing it on the website and provide links to the comms information within documentation.	Immediate	Staff complete, Other stakeholders end Q1 2021
Reporting & Evaluation	Ongoing monitoring of suppliers	Establish a method for the ongoing monitoring and evaluation of high-risk suppliers. This may be integrated into the current Risk & Compliance monitoring.	Immediate	Method complete.
Corporate policy	Update standard clauses	Standard clauses updated in line with the legislation for non-trade business units.	End 2021	Yes
	Sign up to Fair Farms	Join Fair Farms and encourage supplier sign up. Adopted as Harris Farm’s minimum standards after trial.	End 2021	Trialling now
Risk Management	Contract Management	Standard Clauses should be developed that are communicated upfront, either through the tender process or initial vetting process conducted by Risk & Compliance or Procurement.	End 2021	Yes, review Q3
Due Diligence	Create an internal due diligence procedure for high-risk suppliers	When a high-risk supplier is identified, establish an instruction on how to apply a due diligence process to manage risk. This will include assess process and ongoing monitoring. Linked to following action to establish approval process in Vendor Approval Program.	End 2021	Underway
	Establish high-risk supplier check in the supplier Assurance System	Set up an internal supplier requests process in the Vendor Approval Program and ensure used by all staff. Add criteria for commitment to modern slavery and reference to modern slavery objectives in the contractor & supplier performance review.	End 2021	Underway
Communications & Education	Educate staff on the issue of modern slavery	Conduct staff training to create awareness of modern slavery and understanding of the relevance to Harris Farm. Utilising resources such as the antislavery.org.au online module & Edge Consulting.	End 2021	Due end May 2021
Reporting & Evaluation	Develop an evaluation framework for modern slavery mitigation actions	The evaluation framework should set the frequency and responsibility for at least an annual review of the effectiveness of actions taken to mitigate modern slavery risk. KPIs may be assigned to specific actions. The evaluation framework should describe how the review will take place for example through feedback, internal or external audits or data collection and should include an annual review of risks.	End 2021	Yes
	Reporting & review of modern slavery mitigation actions	Use the SLT meeting to review progress on modern slavery mitigation actions. Communicate progress and evaluation of actions to directors via the bi-monthly board meeting. Incorporate evaluation of actions into the new sustainability report.	End 2021	Underway

Appendix C – Action Plan 2022-23

Focus Area	Actions	Detail
Corporate policy	Update Human Rights Policy	Review and update for learnings from 2020-2021
Corporate Governance	Define responsibilities	Map out where the responsibilities for implementing a response to modern slavery lie across the different business areas of Harris Farm. Use this to engage and communicate responsibilities to different business areas and create accountability. Document in the Human Rights Policy.
Corporate policy	Become a signatory to the Food and Grocery Code of Conduct	Food and Grocery Code of Conduct should be signed to formalize the commitment to treat suppliers fairly
Corporate Governance	Establish a modern slavery working group	Establish a modern slavery working group as a sub-group of the Sustainability Team including representatives from across the business who can make key decisions and can assist in actioning items as required. Meetings bi-monthly.
Communications & Education	Create Guidance Document for Staff	Create an internal guideline which includes criteria and process for assessing the risk of modern slavery, including what can be asked and expected responses. This should include guidance for staff and include definitions, examples and explanations on risks and can be linked to or integrated with existing supplier vetting processes regarding additives.
Corporate policy	Adopt Procurement Policy	Overarching Procurement Policy should outline the appropriate procurement practices to ensure the Harris Farm is minimizing its risk and exposure
Risk Management	Introduce Contracts with Suppliers	Introduce Contracts with Suppliers to ensure that Harris Farm is protected from all risks including financial, safety, quality and modern slavery.
Risk Management	Establish Go/No Go process	Establish Go/No Go's for suppliers that cover human rights and modern slavery
Due Diligence	Supplier training	Create simple supplier training tools such as communication sheets, webinars and newsletters that can also be shared internally. These can be provided in the early stages of onboarding and be periodically sent out throughout the relationship. Establish interactive training sessions with suppliers that require completion of tasks: link to supplier assessment
Communications & Education	Educate staff on the issue of modern slavery	Create ambassadors within the organization and across stores to raise awareness of and continue to engage staff on the risks, including for petty cash or reimbursable purchases at the store level.
Remediation	Promote Remediation	Culture Changes: Promotion of remediation approaches by staff and engagement of suppliers through these changes to be developed through training of both suppliers and staff to encourage transparency and collaboration. Training and communications programs to encourage open discussion and reporting of concerns. Communication of plan outcomes to stakeholders.

Risk Assessment in partnership with Edge 

Board Approval

The Harris Farm Markets Modern Slavery Statement for 2020 has been approved by the principal governing body: Harris Farm Markets Board of Directors, on 25 March 2021.

Signed:

A handwritten signature in black ink, appearing to read "T. Harris", written over a horizontal line.

Date: 31/03/2021

Name: Tristan Harris

Position: Director