



Superior Food Group Pty Ltd

Modern Slavery Statement 2023

Message from the CEO



Craig Phillips
Chief Executive Officer
Superior Food Group

"I am pleased to present our Modern Slavery Statement which outlines the steps Superior is taking to uphold human rights and do our part to eradicate modern slavery. While our business operations and supply chains are complex, we are committed to identifying any potential or actual adverse impacts of our operations on the human rights of others. Where appropriate, we implement prevention, mitigation and remediation processes.

We are committed to the highest levels of ethics and integrity in the way that we do business. All Superior employees, executives and contractors are subject to guiding principles of conduct and behaviour outlined in our Business Code of Conduct and Ethics. We understand that this is critical to our continued success and reputation. We strive to promote an ethical corporate culture by observing the highest standards of fair dealing, honesty, and integrity in our business activities.

At Superior, our performance reflects on our customers' business, which is never taken for granted. Our ongoing commitment to reducing modern slavery risks in our operations and supply chain are paramount to our mutual success. Reputation is everything in foodservice, and Superior's long term supply chain partnerships, employees, and customers, are appreciated and respected. While we are pleased with our progress, we recognise that continuous improvement is key to addressing modern slavery and this includes regularly reviewing our performance and that of our supply chain."

1. Reporting Entities/Introduction

This Statement is made on behalf of SFG Group Holdings Pty Ltd (ACN 607 436 386) and its controlled entities (collectively referred to as 'Superior Food Group' or 'Superior' or 'SFG'), pursuant to the requirements of the Modern Slavery Act 2018 (Cth).

In preparing this Statement, SFG sought input from both internal and external subject matter experts to undertake due diligence on structure, operations, and supply chain. Associated risks have been assessed and remediation action plans developed and reviewed.

SFG has focussed on the modern slavery risks of our Tier 1 suppliers. SFG understands that Tier 1 suppliers are those with whom SFG has direct contact. Tier 2 suppliers are considered the suppliers of SFG's key contractors and subcontractors. Tier 3 suppliers are the subcontractors or contractors of the Tier 2 suppliers.

This Statement has been reviewed and approved by the Board of SFG Group Holdings Pty Ltd on 15 August, 2023 for the FY23 reporting period and will be reviewed annually.



2. Our Statement

These values demonstrate SFG’s commitment to eliminating modern slavery practices and describe how activities have and will be undertaken to mitigate risks of those practices in supply chains. SFG has prided itself as being a leader in the food service sector and is committed to supporting the Modern Slavery Act 2018 (Cth).

SFG strongly supports governmental mechanisms aimed at addressing violations of human rights. This Statement outlines SFG’s operations and supply chains, modern slavery risks, actions taken by SFG to date, the effectiveness of those actions and the approach taken during our first reporting period.

This Statement sets out the current state of operations and identifies areas of improvement. This Statement is backed by SFG’s steadfast commitment to consistent and continuous improvement, and a willingness to recognise the risks in our current state and to undertake the necessary actions to minimise and mitigate those risks.

INTEGRITY

We do the right thing. We honour our commitments, act honestly and respectfully in all we do, and when we make mistakes, we acknowledge and learn from them.



EXCELLENCE

We strive to exceed expectations and deliver what we promise. We are never satisfied with just good enough and take pride in what we do. We strive to deliver excellence the first time.



SERVICE

Our customers always come first. We challenge our ideas of what’s possible and continually innovate to provide the best service and products.



TEAMWORK

We work collaboratively and know that we only achieve greatness through teamwork so we can deliver the best outcomes for our customers.



ACCOUNTABILITY

We take ownership of our work and commit to doing our job to the best of our ability, even when it gets challenging. We are empowered to take responsibility so we can strive for excellence in all we do.



3. Organisational Structure and Governance

Superior is committed to sound corporate governance practices and we believe that this is the responsibility of everyone at Superior, from senior management to our most junior employees. We commit to transparency, acting with care and diligence, respecting the environment and promoting a safe and healthy workplace environment.

We have established several working groups to support the improved performance across our ESG priority areas. The working groups are comprised of representatives from across the business to advance the implementation of our ESG initiatives and promote continuous improvement.

Superior Foods - ESG Governance



Board

- Provide board-level oversight to review the effectiveness of the responsible sourcing policy and standards, as well as other initiatives and commitments designed to respect human rights within supply chains.
- Monitor and provide oversight of the company's human rights due diligence for its operations and supply chain.
- Approves the Modern Slavery Act Statement.

ESG Committee

- Responsible for approving policies, external business-wide commitments and public disclosures.
- Provides input on the strategic direction of the ESG Strategy and Modern Slavery commitments.
- Accountable for Modern Slavery program adoption within respective business units.
- Decision maker for any decisions and issues with a business impact on behalf of the business unit they represent.
- Provides updates and raises issues to the Board for awareness and executive oversight.
- Responsible for leading any situation involving Modern Slavery within their respective business unit.

* Includes advisory members who represent internal business groups (e.g. Legal, Culture & People, Governance) for counsel.

ESG Working Group

- Responsible for day-to-day operations of the Delivery of the ESG program based on SFG policies and procedures.
- Educates internal business partners and suppliers on SFG requirements and processes.
- Reports on supply chain health to ESG Committee.
- Identifies and surfaces business unit specific SFG support needs for consideration (i.e. risks, process gaps).

4. Our Operations and Supply Chain

Superior Food Group is an industry leader, that for the last 30 years, prides itself on delivering great outcomes for a broad range of customers across a varied landscape of foodservice clients. We are Australian owned and operated and we are determined to continue to evolve, improve and to be at the forefront of innovation in the ever changing, competitive foodservice market. With a wide range of dry, chilled, frozen, meat, smallgoods and seafood lines, Superior proudly services all facets of the food service industry.

Superior partners with restaurants, cafes and canteens, big and small, as well as organisations such as caterers, schools and universities, healthcare and aged care facilities and a variety of other food service operations.

Superior is well represented with 20 branches nationally and a diverse range of product categories. These also include our Global Meats and Mooloolah River Fisheries protein businesses.

Superior has more than 1,300 employees employed under enterprise agreements, awards, and common law contracts. Superior undertakes 3rd party compliance audits to ensure that our employees are being paid in accordance with our statutory obligations.



4. Our Operations and Supply Chain

Superior employs staff on a permanent, part time or casual basis with minimal use of labour hire suppliers. All Superior employees have the right to join a union and bargain collectively. All employees are subject to the Company's Business Code of Conduct and Ethics.

Superior sources more than 12,000 foodservice products from more than 600 suppliers, the majority of which are well known brands from Australian food manufacturers. These suppliers range from large manufacturing businesses to small-medium family-owned enterprises.



5. Industry Challenges

Australia has a robust legislative framework criminalising trafficking of persons, slavery and slavery like practices. Slavery-like practices include servitude, forced labour, and deceptive recruiting. Offences apply to public sphere exploitative labour practices and exploitation in the private sphere.

Australia's commitment to prevent slavery-like practices is reflected in legislation protecting victims of modern slavery. For example, victims of modern slavery may be protected under the vulnerable witness protection program (Crimes Act 1914 (Cth)) and Criminal Code Act (1995)). Additionally, the Migration Act 1958 (Cth) provides for offences for allowing persons to work in breach of visa conditions, as well as allowing victims who do not hold a valid visa to remain lawfully in Australia.

The Modern Slavery Act 2018 (Cth) establishes a risk-based framework to target modern slavery practices in supply chains, further supporting Australia's commitment to prevent slavery-like practices.

Australia's laws relating to slavery offences have extraterritorial jurisdiction meaning that action may be brought against offenders whether or not they are Australian citizens, whether or not the victims are Australian citizens and whether or not the conduct occurred within or outside Australia.



6.Risks/Focus Areas

The food industry in which Superior operates is recognised as a high-risk sector for modern slavery. Superior has investigated all the areas where it may cause or contribute to modern slavery. Within our own operations throughout Australia, risks relate to our labour and employment practices as well as the services we utilise such as cleaning and maintenance. In our supply chains, risks relate to the goods we purchase for resale including small volumes of imported lines (approximately 5% of the frozen products for our seafood business are imported).

Superior has considered the following when reviewing modern slavery risks in our operating businesses. Although the risk has been assessed as LOW, we remain vigilant and will continue to undertake regular reviews of our corporate policies and procedures, labour practices, and employee awareness and training at all levels.

- Superior has no operations outside of Australia.
- The majority of Superior employees are directly employed in permanent or casual positions under enterprise agreements or under terms of modern awards or common law contracts.
- Superior operates within a strict legal framework that governs working conditions in Australia which is subject to regular independent audit.
- Superior only engages with licenced labour hire providers under a stringent labour hire agreement.
- Recruitment and selection processes have strong governance, and all employees must demonstrate their legal right to work in Australia prior to commencement.

In relation to supply chain, Superior has assessed the risk profile as MEDIUM.

- Superior recognises the complexity of the food industry supply chain and the challenges of undertaking detailed audits, particularly of tier 2 and 3 suppliers.
- The majority of Superior's procurement activity involves purchasing good and services direct from Australian based suppliers which lowers the risk of modern slavery practices.
- Risks of potential modern slavery exist in all stages of the supply chain from raw materials to processing, packaging and freight.
- All products for our seafood operation come from suppliers who source from sustainable fishing grounds and have MSC certification.
- Superior operations are registered on the SEDEX platform.

7.Actions and Approach

Superior understands that addressing the problem of modern slavery is a continuous journey. The business has developed an action plan to ensure we have a continual assessment of the effectiveness of our due diligence, ongoing awareness of modern slavery risks with employees and suppliers, and training programs at all levels.

Given the assessment of supply chain risk as MEDIUM, special emphasis will be placed over the next reporting period to strengthen modern slavery commitments with our trading partners that will form the basis of review and audit.

Focus will be placed on the following:

Compliance

The Supplier must comply with all Modern Slavery Laws and take reasonable steps to identify, assess and address risks of Modern Slavery in its operations and supply chains.

Supplier Warranties

The Supplier represents and warrants that neither it nor the Supplier Personnel or its Related Bodies Corporate:

- a. have been convicted of any offence involving Modern Slavery; and
- b. to the best of its knowledge, having made reasonable enquiries, have been or are the subject of any investigation, inquiry or enforcement proceedings by any government Agency regarding any offence or alleged offence of, or in connection with Modern Slavery.

Notification

The Supplier will immediately give written notice to SFG if it becomes aware of a possible, potential, suspected or actual breach by it or its Supplier Personnel of any Modern Slavery Laws.

Assistance

The Supplier will comply with any reasonable requests made by SFG for assistance, for the provision of information or documents as required by SFG to enable SFG's own compliance under or related to Modern Slavery Laws.

Modern Slavery Action Plan

Policy

Develop and implement a SFG Modern Slavery specific policy and procedure, and ensure where applicable that the policies and procedures address the risks of modern slavery and endeavour to mitigate those risks.

Due Diligence

Work with trading partners to ensure they are committed to minimising the risk of Modern Slavery.

Promote Awareness

Promote the awareness of Modern Slavery through the implementation of training and support to enable staff and suppliers, partners and other stakeholders to identify and respond to risks of modern slavery.

Reporting to the Board

Ensure that SFG meets its commitment to modern slavery through SFG board level reporting. Continue to engage and utilise the guidance materials provided and recommended by the Australian Border Force and key international organisations – ILO.

Analysis and Review of Suppliers

Undertake assessment of SFG's Tier 1 Suppliers across operations and supply chain.

Action

SFG will encourage suppliers and key employees to undertake training and education courses which are publicly available in order to increase their understanding and awareness of modern slavery in SFG's operations and supply chain.