

# Modern Slavery Statement 2023/2024

PMFresh Pty

## Introduction

This is our first Modern Slavery Statement (**Statement**) for PMFresh Pty Ltd and it is in line with the requirement of the Modern Slavery Act 2018 (Ctn) (the **Act**). It relates to the reporting period that commenced on 01 Jan 2023 and ends on 31 Dec 2023 (Reporting Period).

The aim of this Statement is to highlight our activities to ensure that PMFresh has solid structures and processes in place to eliminate the risk of modern slavery in our business and approved supply chain. PMFresh will not tolerate any form of human rights abuse, including modern slavery, forced labour or human trafficking, servitude, debt bondage, unethical sourcing for labour and services in our operations or supply chain. We are fully responsible to ethical business operations through the respect of human rights in all our business dealings, while performing and strengthening policies and motivating a transparent performance, in line with the requirements of the Modern Slavery Act 2018.

PMFresh works with suppliers that have the same ethics, values, and sustainable business practices, including those related to human rights. PMFresh acknowledge that as a large fresh produce and ready meals manufacturer, the business activities as well as the suppliers engaged by the company can have a crucial impact on our performance and reputation within the communities in which we operate. Hence, the actions of all PMFresh members and suppliers must always be based on an acknowledgment of human rights and values such as integrity, trust, impartiality, respect, liberality, freedom, equality, and legality, as well as a commitment to the environment. In accordance with our values, we continue to expand our approach on recognizing and covering modern slavery and human trafficking related risks.

Our report demonstrates the achievement we have made and will keep making to assess and identify risks of modern slavery and human trafficking in our business, employment performances, and supply chain, as well as the steps we are taking to have in place the most suitable actions to these risks.

## Our business structure and reporting entities

The reporting entity for this Statement is PMFresh Pty Ltd, a proprietary limited company headquartered in Homebush NSW, as well as WA, VIC, and QLD, trading as PMFresh.

PMFresh's main operation is fresh produce, ready meal, salad kit, soup, sauces and mash for retail markets and food services. Our main brands are Local Kitchen and Salad Fresh and our main customers include retail and supermarket chains and foodservice restaurants, many of whom we have long-standing relationships with. We also manufacture private label brands for our retail market customers.

PMFresh employs more than 500 permanent employees who come from culturally and ethnically diverse backgrounds, most are new migrants who have started their careers in Australia with PMFresh. PMFresh is dedicated to multinational personnel, where migrants continue to contribute to the Company's economic growth. Working with PMFresh plays a vital role in accomplishing better settlement and integration results for migrant employees.

PMFresh maintains its head office manufacturing facility at 28-32 Carter Street Homebush Bay NSW 2141. More information about PMFresh can be found on our website <https://www.pmfresh.com.au/>

## Overview of PMFresh Supply Chain

The goods and services that make up our products are obtained locally and abroad, which include raw materials and packaging used in the manufacture of our final products. Additionally, our supply chain includes services that contribute to our main operations, such as transporters and carriers, cleaning services and security providers.

Classification of products and services in our supply chain include:

- Raw material ingredient (Produce and non - produce)
- Packaging, including labelling.
- Waste treatment
- Equipment and equipment services (Maintenance contractors)
- Pest control
- Security services
- Transport and logistics
- Consultant (Professional advisors)
- Human resource provider

We have approximately 51 direct suppliers from Tier 1 for ingredients/raw materials, packaging, and labelling. Tier 1 suppliers are based in Australia. We also have countries like China, India, Thailand, New Zealand, Denmark Canada, UK as indirect sources of our imported raw materials and packaging.

PMFresh also utilizes service providers for day-to-day activities such as uniform supply and laundering, office supplies, cleaning services, maintenance, telecommunications, equipment rental, car rental, laboratory services, and finished goods distributors.

## Risks of Modern Slavery Practices in Our Operations and Supply Chain

### ➤ PMFresh Operations:

PMF manufactures and distributes prepared salads (wet and leafy), vegetable sauces and soups, as well as bulk cut and prepared vegetables with operations across four sites at Homebush (NSW), Colmslie (QLD), Broadmeadows (VIC) and O'Connor (WA).

Due to the nature of the food manufacturing industry, there is discerned risk of modern slavery due to the high number of unskilled and migrant labour.

In response to this PMF makes sure that all personnel are paid in accordance with either (i) Enterprise Bargaining Agreements based on the Food, Beverage and Tobacco Industry Award in the Victorian and Queensland operations, or (ii) with the Food, Beverage and Tobacco Industry Award in NSW and Western Australia. Workers pay and conditions are subject to external and internal audit on an annual basis to ensure compliance with local laws and regulations in Australia. PMFresh operations has robust employee governance structures with precise policies, procedures and training processes to ensure that all of our employees are treated fairly, paid accordingly and are provided with appropriate working conditions.



- **Supply Chain Overview:**

The supply chain covers the following products and services acquired in the food manufacturing process.

(a) **Core suppliers** include:

- Fresh produce
- Ingredients (Non-Produce)
- packaging
- consumables (food-contact)
- cleaning chemicals & processing aids
- service providers including transport.
- labour hire for production work force (in addition to employed staff).

(b) **Non-core suppliers** include:

- information technology;
- manufacturing equipment and spare parts;
- building Improvements.
- professional services providers of legal and financial services.
- human resources and
- sanitary, pest control and maintenance services.

The supply chains for the food and agriculture industry have naturally higher risk of modern slavery due to the demographic of the workforce and the nature of the work activities in the production, processing, packaging, and transport of the products. As eighty percent (80%) of PMFresh's sales come from Australia's two largest retailers, Coles and Woolworths, the company is required to ensure not only high food quality but also that the product is delivered ethically. Therefore, PMFresh has developed, in cooperation with the major retailers, a rigorous supply-chain governance framework comprising of policies, procedures, training and controls/ audits in respect to the selection, appointment, onboarding and management of suppliers.

PMFresh, has joined SEDEX as a supplier and has itself undertaken SMETA audits to be a certified supplier.

Based on these qualifying factors we have rated the presence of any modern slavery in our supply chain as being Low - Medium.

### **Actions Taken to Address Modern Slavery Risks**

Over this reporting period, we continued to make progress in executing actions and maintaining our procedures to support the prevention of modern slavery risks within our operations and supply chains. These are our most relevant policies and due diligence processes that are designed to eliminate modern slavery:

- **Code of Ethics and Code of Conduct:** PMFresh is responsible to upholding human rights, fair working conditions and environmental protection within the Laws of Australia (State and Commonwealth). In accordance with the expectations of our customers, the community, and the requirements of the Law, we endeavour to always operate responsibly within the community, and we seek to trade with suppliers who show the same commitment. We are responsible for informing our suppliers of our expectations via our Approved Supplier process.

This includes:

- Whistleblower Policy
  - Child labour
  - Forced and compulsory labour
  - Freedom of association and right to collective bargaining
  - Harsh or Inhumane Treatment
  - Workplace Health & Safety
  - Discrimination
  - Business integrity
  - Disciplinary Practices
  - Working Hours
  - Remuneration
  - Environmental standards
- **Whistleblower Policy:** PMFresh motivates employees and others to report and speak up about suspected or actual occurrence(s) of an illegal behaviors such as irregular, dangerous, or unethical behavior, including breaches of legislation, criminal activity. The Whistleblower Policy enables anonymous reporting as well as the ability to report to an externally and independently managed website/hotline. During this reporting period, the Whistleblower platform has not identified any reports related to modern slavery.
  - **Child labour Policy:** Child labour is work that deprives children of their childhood, their potential, their dignity, and is harmful to their physical and mental development. PMFresh is committed to not using or supporting child labor; engagement of all workers according to the applicable laws of the state/country with a minimum age of 16.
  - **Forced and Compulsory Labour:** PMFresh shall not use or support forced or compulsory labour; no required deposits' - financial or otherwise; no withholding salary, benefits, or payments property or documents to force employees or labour hire workers to continue to work; right to access their papers freely; right to leave premises after workday; free to terminate their employment including terminating their contract with a labour hire agency; and no use nor support for human trafficking.
  - **Remuneration:** PMFresh respects the right of workers to a living wage (minimum Meat Award Rates) all workers paid at least legal minimum wage; deductions are only made if authorised in writing by the worker, with some exceptions (e.g.: legal garnishee); wages and benefits clearly communicated to workers; paid in a convenient manner; and overtime paid at applicable rates. Our employees are paid electronically via direct debit in accordance with an electronic time and attendance system.
  - **Fraud and Corruption Control Policy:** outlines the approach to controlling fraud and corruption in and against the Company.
  - **Ethical sourcing Policy:** requires our suppliers to follow and comply with the Modern Slavery Act.
  - **SEDEX:** Our Company is a member of SEDEX (Supplier Ethical Data Exchange), where our information is available to our customers and suppliers.





- **SMETA 4 Pillar Ethical Audits:** an audit was completed in 2023 by an external SMETA auditor focusing on Human Rights and Equal Opportunity in compliance with the Australian labour law requirements.

For our supply chain, we are fully responsible for working with suppliers with our shared position on ethical, environmental, and modern slavery practices. We currently conduct an Ethical and environmental assessment through our annual supplier review where we seek to gather data from our suppliers regarding their regulatory compliance, employment, health and safety and environmental practices in the supplier's own operations and supply chain. During the reporting period, all our core and non - core suppliers will have acknowledged our policies by completing a PMFresh supplier questionnaire. In addition, all our suppliers will have received the Code of Conduct and Ethical Sourcing Policy and agreed to it.

We have taken the following actions to minimize our exposure to modern slavery risks:

- Working closely with suppliers on modern slavery issues and establishing rules supply contract clause, which sets the minimum requirements they need to succeed to comply with our modern slavery framework.
- Assessing risks in our supply chain based on a supply chain risk assessment.
- Executing a modern slavery statement in the induction handbook for onboarding all employees.
- Training all our personnel with the Modern Slavery Statement.
- Sharing PMFresh Ethical Sourcing Policy and compliance expectations to all suppliers of goods and services of the Company.

#### **Assessing Effectiveness of our Actions:**

To provide full visibility and continuity between our modern slavery practices, the data below keeps track of the actions the Company has accomplished during the past reporting periods, as well as the ongoing ones we continue to address during this reporting period for further improvement in our modern slavery framework.

| Action  | 2021 | 2022                         | 2023                         |
|---|------|------------------------------|------------------------------|
| Working directors establishment in charge of overseeing the management of compliance with the Modern Slavery Act. | X    | x                            | In process of implementation |
| Policies gap analysis and development.  | X    | ✓                            | ✓                            |
| Employee and staff induction.   | ✓    | ✓                            | ✓                            |
| Employee and staff training.  | ✓    | ✓                            | ✓                            |
| Improve awareness of grievance systems.   | X    | In process of implementation | ✓                            |
| Performance of risks assessment of structure, operation, and supply chain.  | ✓    | ✓                            | ✓                            |
| Engagement with SEDEX.  | X    | ✓                            | ✓                            |
| Supplier requirement to complete the Ethical Procurement Self-Assessment form.                                    | ✓    | ✓                            | ✓                            |
| Publication of Modern Slavery Statement on the Company's website.   | ✓    | X                            | In process of implementation |
| Expanding stakeholders' engagement.   | X    | In process of implementation | In process of implementation |
| Amendment of Terms and Conditions to address modern slavery compliance.   | X    | In process of implementation | ✓                            |
| Delivery of copy of our Code of Ethics and Ethical sourcing Policy to suppliers.                                  | ✓    | ✓                            | ✓                            |

### Consultation process and approval:

This Statement is made in accordance with section 14 of the Modern Slavery Act 2018 (Cth). It represents the joint Modern Slavery statement on modern slavery for the financial year ended 30 June 2024. This Modern Slavery Statement has been reviewed and approved by PMFresh board of Directors on 20 / 02 / 2024.

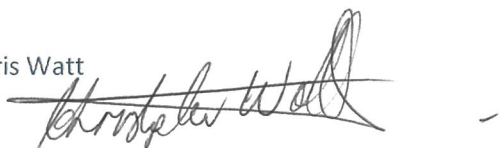
PMFresh does not own or control any other entities and therefore consultation with another entity was not needed. Our board of directors controlled by our key senior management personnel was consulted and collaborated in the preparation of this Statement, taking into consideration the work the Company does with

auditors, suppliers, labour providers, customers, and regulatory bodies to make sure the risk of modern slavery is reduced.

This Statement has been prepared by PMFresh National Compliance team in consultation with board directors and it has been reviewed and approved by:

Name: Chris Watt

Signature:

A handwritten signature in black ink, appearing to read 'Chris Watt', written over a horizontal line.

Title: Executive Director

Date: 20/02/2024



