

2024-2025

Modern Slavery Report



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Introduction and Statement of Commitment



Freshmax Group and its fully owned subsidiaries are dedicated to the highest standards of ethical and responsible operations. We recognise that sustainable business growth requires a consistent commitment to protecting human rights. The businesses commitment is unequivocal: to ensure safe, fair working conditions and to treat every individual within our network equally with respect and dignity.

Ownership and Governance Update

In January 2025 the business (Freshmax Group) was acquired by an entity associated with ROC Partners, a specialist alternative investment manager based in Sydney. This acquisition has reinforced our institutional oversight and provided a renewed mandate to strengthen our ethical sourcing frameworks. Under this new ownership, we are further integrating rigorous ESG Environmental, Social, and Governance (ESG) principles into our core commercial strategy.

Scope of this Statement

This document constitutes the fifth Modern Slavery Statement issued by the Freshmax Group in accordance with the Modern Slavery Act 2018 (Cth). It provides a detailed account of the mandatory criteria and specific actions taken by Freshmax Group Pty Ltd and its subsidiaries to identify, assess, and mitigate modern slavery risks within our operations and global supply chains. This report covers the 2025 financial year (1 October 2024 – 30 September 2025). Building on our previous disclosures, this statement demonstrates the integration of risk-management protocols into our procurement processes and our ongoing focus on addressing systemic vulnerabilities within the horticulture sector.

Defined Terms and Application

For the purposes of this statement:

- **Modern Slavery:** Encompasses all forms of exploitation as defined by the Act, including slavery, servitude, forced or compulsory labour, debt bondage, deceptive recruiting for labour or services, child labour, and human trafficking.
- **Our Extended Workforce:** Refers collectively to our direct employees, our diverse supplier network, and the individuals employed within those supply chains.

We recognise that the safety and well-being of our extended workforce is critical to our collective success. We remain committed to transparent reporting and the continuous evolution of our mitigation efforts to combat modern slavery in all its forms.

Criterion 1: Identify the Reporting Entity

Reporting Entity

This joint statement is made on behalf of Freshmax Group Pty Ltd and its controlled subsidiaries (collectively, "the Group"). Freshmax Group owns / controls the following entities (joint statement). Unless otherwise indicated in this statement, the terms 'Freshmax Group', 'Freshmax', 'the Group', 'Business', 'We', 'Our', 'Us' refers to Freshmax Group Pty Ltd and its controlled entities collectively (including all reporting entities). All numbers, statistics and facts described in this Statement are as of 30th September 2025, unless otherwise stated.

Company Name	Business Number
Freshmax Group Pty Ltd	33 154 789 321
Freshmax Pty Ltd	91 120 592 510
Freshmax National Pty Ltd	61 050 197 343
Freshmax Australia Pty Ltd	57 124 947 824
Valleyfresh Exports Pty Ltd	39 165 973 455
Innovar Global Pty Limited	41 124 948 125
Deluca Banana Marketing Pty Ltd	45 105 141 553
VF Direct (N.Z.) Limited	94 29 030 206 243
BerryCo NZ Limited	94 29 041555316
Innovar Global Limited	94 29 047 598 201
Freshmax New Zealand Holdings Limited	94 29 032 723 588
Valleyfresh North America LLC	26-3657493

Criterion 2: Structure, Operation and Supply Chain

Freshmax is a leading distributor and marketer of fresh produce in the southern hemisphere with operations in Australia, New Zealand, the USA, Chile, and Peru.

Our Operations

We manage the sourcing, packing, ripening, treatment and distribution of fresh produce. Our network operates 4 controlled Warehouses and 11 offices.

- Warehouses: Derrimut (VIC, AU), Epping (VIC, AU), Marsden Park (NSW, AU), Rocklea (QLD, AU).
- Offices: Malvern (VIC, AU), Auckland (NZ), Mt Maunganui (NZ), Lima (Peru), Santiago (Chile), Pasadena (California, USA), Dubai (UAE), Jakarta (Indonesia), Vancouver (Canada).
- Core Categories: Include but are not limited to: Bananas, Cherries, Citrus, Berries, Avocados, Table Grapes, Pip fruit and Medjool Dates.

Our Team

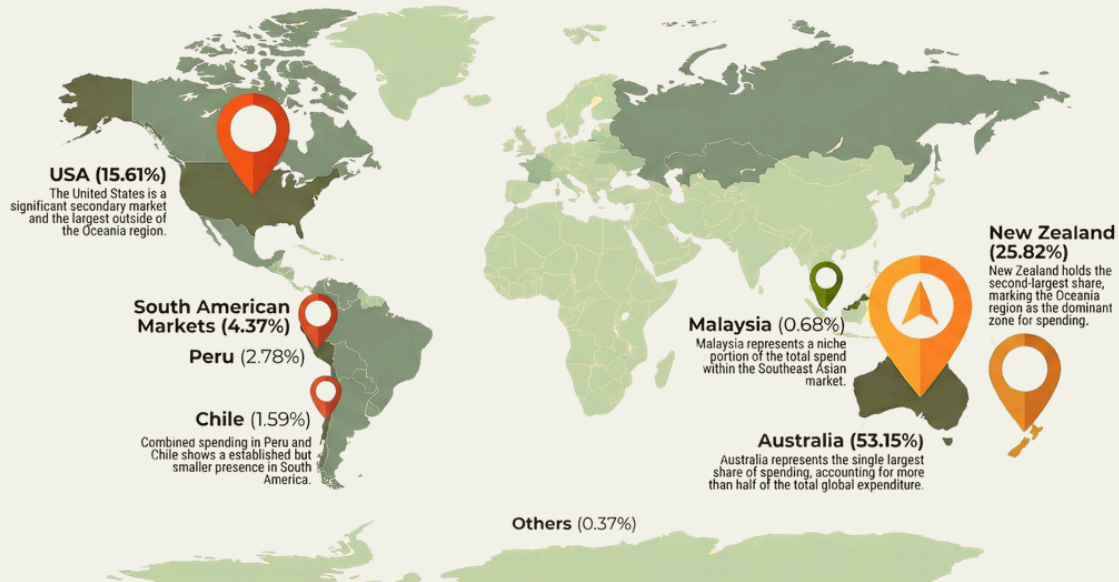
Our Leadership team includes the Group Chief Executive Officer (CEO) and the Group Chief Financial Officer (CFO) who are supported by Senior Leadership team from 11 directly controlled entities. The Senior leadership team is further supported by subject matter experts from different departments (Operations, IT, Finance, Health & Safety and Ethical Sourcing & Business Quality). Together they focus on continuous improvement works on and in the business whilst staying aligned to our Core Values.



Freshmax Group maintains a global workforce of ~265 directly engaged employees (238 full-time, 18 casual, and 9 contractors). During peak periods, we utilised a scalable network of 215 labour-hire personnel to meet a requirement for 40 additional roles, ensuring consistent service delivery. We are committed to a diverse and inclusive workplace, underpinned by formal engagement strategies designed to support a global team and provide a transparent, equitable environment for all employees.

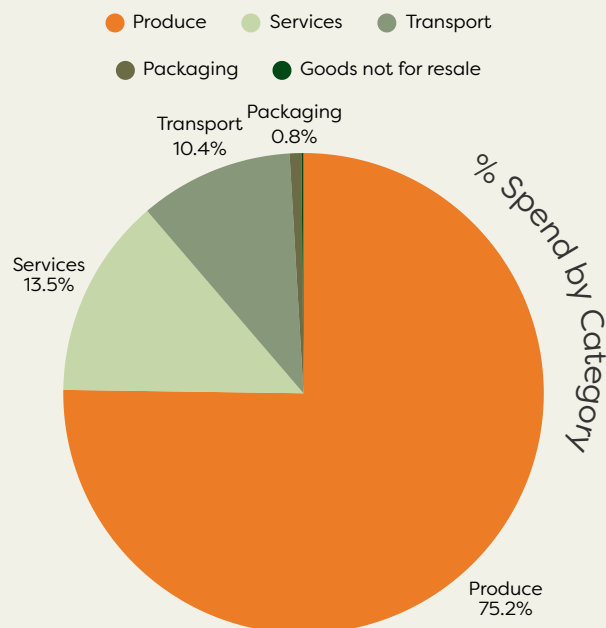
Our Supply Chain

Global Spending Footprint: Breakdown by Country



In FY25, we engaged with approximately 1,232 tier one suppliers globally, categorised into:

- Produce: Growers and orchards (Highest inherent risk).
- Services: Third-party labour providers and facility operations and maintenance.
- Logistics: International and domestic transport.
- Packaging: Corrugated, paper based and plastic materials.
- GNFR: Goods Not For Resale (Office and operational supplies).



Criterion 3: Describe Risks of Modern Slavery

Risk Identification & Assessment Process

In preparing the Statement, the Business considered the risk that we may be causing, contributing, or directly linked to Modern Slavery practices in our operations and supply chain. During the reporting period, the Group did not report or otherwise become aware of any actual or suspected incidents of Modern Slavery practices of any kind in our own operations or supply chain.

During the reporting period, the Business identified its supply chain as a priority area for further review. This reflects the comparatively lower level of oversight and mitigation measures available to manage modern slavery risk within the supply chain relative to internal operations, as well as clear customer expectations regarding the management of labour risks in the supply chain.

Freshmax conducted a supply chain risk assessment to identify suppliers with elevated modern slavery risk. We utilise Self-Assessment Questionnaires (SAQs) as the primary tool for evaluating our supply partners, we also conduct the same review over our company owned sites.

- **Supply Partners:** We require suppliers to complete comprehensive SAQs on the SEDEX or FairFarms platform. Freshmax has also developed a supplier specific questionnaire based on the SEDEX SAQ to roll out to targeted supplier partners.
- **Our own Operations:** We require company owned sites to complete the SAQ on SEDEX platform.
- **Risk Scoring:** We analyse the results of these questionnaires to assign risk ratings, which then inform our mitigation strategies and stakeholder reporting.

Where a supplier has been identified as being high risk, the Business seeks to review the supplier's current process to identify, assess, and manage their modern slavery risks and determine the appropriateness of the approach. We adopt a tailored approach which considers the ability for Freshmax to engage with and/or influence the supplier, subject to the size and maturity of the organisation.

Risk in our own Operations

Freshmax acknowledges that there is potential exposure to modern slavery risks within its direct workforce, however, based on the nature of our operations and the controls in place, this risk is assessed as low.

All Freshmax employees are engaged in accordance with applicable local jurisdictional requirements. Employment arrangements across the workforce are structured to support lawful, transparent, and ethical labour practices.

For the majority of the workforce (approximately 92.45%), this includes engagement under written employment contracts that align with relevant local statutory requirements. To further support compliance and transparency, Freshmax has implemented standardised policies across all business-owned sites, including mandatory training on Human Rights, Whistleblower Protection, and the prevention of Bullying, Harassment, and Discrimination.

The remaining 7.55% of directly engaged employees are based in the United States, where written employment contracts are not the jurisdictional standard. For these roles, Freshmax operates within established US federal and state employment frameworks, supported by defined mitigation protocols and administrative controls designed to ensure full legal compliance. While these engagements are “at-will” in accordance with California law, Freshmax mitigates associated labour risks by maintaining robust internal safeguards that strictly prohibit termination on the basis of discrimination or retaliation, ensuring all US personnel retain fundamental workplace protections.

While the overall risk is assessed as low, Freshmax recognises that certain risk factors, particularly where they intersect, may increase the vulnerability of specific employee groups. These considerations are actively addressed through the Group’s broader governance arrangements, people management practices, and compliance processes.

The employee groups that may experience increased vulnerability to modern slavery risk include:

Employee Group

Details

Casual and/or temporary contract employees

Freshmax engages casual and temporary staff to manage short-term vacancies and leave requirements. These personnel undergo the same mandatory onboarding process as permanent employees. All engagements are documented via written employment contracts that align with local statutory requirements.

Labour-hire and agency employees

During peak seasons, two Freshmax-owned sites in Australia engage registered Labour Hire providers to manage workload fluctuations. These providers must adhere to the Freshmax Supplier Code and are included within the scope of our SEDEX (SMETA) audits. These audits verify compliance with award rates and labour laws through document reviews and anonymous worker interviews. Our current audit cycle has not identified any material labour-related breaches or modern slavery risks within these provider partnerships.

Visa Holders (Right to Work)

All personnel on temporary visas undergo a rigorous digital verification process (such as VEVO in Australia) to confirm their legal right to work. This process ensures that work entitlements remain current and appropriate for the specific duties being performed.

Employees not based in Australia

Employees based outside of Australia are integrated into the Group's governance framework. In addition to localised onboarding, these teams have full access to global policies and reporting channels, including Whistleblower Protection and the Anti-Bullying, Harassment & Discrimination Standard.

Employees under the age of 18

Freshmax enforces a strict Child Labour Standard across all operations. The business maintains a minimum employment age of 16. All workers under the age of 18 are subject to additional oversight to ensure their roles are safe and compliant with jurisdictional youth employment laws.

CALD Workforce

To support our Culturally and Linguistically Diverse (CALD) workforce, Freshmax provides essential induction and onboarding documentation—specifically regarding Modern Slavery and workplace rights—in the preferred languages of the relevant team members.

Risk in Supply Chain

According to the 2023 Walk Free Global Slavery Index, 96.17% of our procurement spend is directed toward suppliers in countries classified as having low vulnerability to modern slavery. Notwithstanding this statistical distribution, Freshmax recognises that the horticulture sector carries inherent systemic risks. These are driven by high seasonal labour demands and a reliance on third-party labour hire, both of which require targeted and continuous due diligence to mitigate potential exploitation.

During the initial onboarding phase, all supply partners are required to formally commit to the Freshmax Supplier Code, which is structurally aligned with the Ethical Trade Initiative (ETI) Base Code. To verify compliance, suppliers must complete a Self-Assessment Questionnaire (SAQ) through independent third-party platforms including Sedex, FairFarms, or CENTRL.

In the 2025 reporting period, the Group successfully assessed 49.17% of its supply chain by spend. Our strategy prioritized a materiality threshold of the top 40% of expenditure, ensuring our due diligence was focused on the areas of highest commercial leverage and potential risk exposure. Having exceeded this initial target, Freshmax has committed to increasing this assessment coverage by a further 12% by spend for the upcoming financial year.

Utilising independent platforms including Sedex, FairFarms, and CENTRL, our 2025 risk assessment identified that Tier 1 produce suppliers in regional Australia and the USA remain our areas of highest inherent risk exposure.

Where a supplier has been categorised as 'High Risk', the Business seeks to review the supplier's current process to identify, assess, and manage their modern slavery risks and determine the appropriateness of the approach. We adopt a tailored approach which considers the ability for Freshmax to engage with and/or influence the supplier, subject to the size and maturity of the organisation.

During this reporting period, we significantly strengthened our supply chain oversight through the completion of 44 social audits via the Sedex platform and 3 third-party audits through FairFarms. These audits provide the granular, on-the-ground data required to move beyond self-assessment and into verified compliance.



Criterion 4: Describe Actions Taken to Assess and Address Risks

Actions to Manage Risks in Operations

Freshmax maintains a standardised governance framework to mitigate modern slavery risks within our internal operations. Our People and Culture team implements the following controlled processes to identify and protect vulnerable personnel across our global footprint.

Structured Employee Onboarding

Onboarding serves as our primary preventative control. While the delivery method is tailored to regional legal requirements, the core compliance standards remain consistent.

For Australia and New Zealand (AU & NZ):

- **Digital Governance:** We have transitioned from legacy paper-based systems to a digital-first approach. New hires are automatically assigned site-specific policies via the TANDA system, ensuring documented awareness of work rights and entitlements from commencement.
- **Compliance Modules:** All personnel must complete core training modules covering including but not limited to Human Rights, Workplace Health & Safety (WHS), and a Respectful Workplace Standard (Anti-Bullying & Harassment), Whistleblower avenues and protection.
- **Contractual Integrity:** A mandatory requirement of our framework is the execution of formal written contracts for 100% of the AU and NZ workforce.

For International Operations (North and South America):

- **United States (California):** Operations follow an "at-will" model as per local jurisdiction. Mitigation is managed through mandatory signing of Offer Letters and Employee Handbooks, supplemented by background checks and dedicated whistleblower channels to report discrimination or retaliation.
- **South America (Peru and Chile):** Workers are engaged via Formal Service Contracts. These define the legal parameters of engagement and are currently undergoing a Group-level review to further align local grievance mechanisms with our global ethical sourcing standards.

Independent Audit and Verification Programs

To lead by example, 100% of Freshmax-controlled warehouses in Australia are registered with Sedex. All sites have completed a Self-Assessment Questionnaire (SAQ) and underwent a SMETA 2-Pillar Audit within the last 12 months.

These audits verify compliance against the ETI Base Code and compliance with local labour and safety regulations, specifically:

- **Labour Standards:** Verification of freely chosen employment, child labour prevention, and alignment with legal or living wage standards.
- **Health and Safety:** Assessment of hazard management, fire safety, and access to sanitation and medical care.
- **Management Systems:** Evaluation of internal controls regarding subcontracting and the legal Right to Work.

Multi-Jurisdictional 'Right to Work' Verification

Freshmax enforces a rigorous process to ensure all personnel possess the legal right to work before they commence duties:

- **Digital Validation:** We utilise VEVO in Australia and New Zealand, and federal identity standards in the US, Canada, and Dubai. In Indonesia, Peru, and Chile, residency permits are validated against local labour ministry requirements.
- **Continuous Monitoring:** We conduct recurring audits to identify expiring visas or changing permit conditions in advance, ensuring no person is engaged outside of their legal entitlements.

Policy Integration and Remediation

Our commitment to human rights is embedded through a suite of enforceable standards that govern both our internal operations and our external partnerships:

- **Supplier Code of Conduct:** The Freshmax Supplier Code is a non-negotiable component of our procurement framework. Grounded in the Ethical Trade Initiative (ETI) Base Code, it establishes the minimum ethical and legal expectations for all third-party partners. By requiring formal sign-off during onboarding, we create a contractually binding obligation for suppliers to prohibit forced labour, provide safe working conditions, and respect the fundamental rights of their workforce. This Code provides Freshmax with the necessary leverage to demand transparency and, where necessary, conduct independent audits to verify compliance.

- **Anti-Bullying and Anti-Harassment Standard:** Freshmax maintains a strict standard to ensure a workplace free from intimidation, coercion, and abuse. This policy is integrated into our mandatory induction for all global staff and is reinforced through regular training. By clearly defining prohibited behaviours and establishing formal reporting lines, we mitigate the risk of workplace culture becoming a conduit for labour exploitation. This standard ensures that all personnel, regardless of their location or contract type, are empowered to work in an environment defined by professional respect and safety.
- **Whistleblower Protection:** This provides a safe, confidential, and third-party channel for reporting misconduct without fear of reprisal. It is a critical "early warning" system designed to identify potential modern slavery indicators that may not be captured through traditional management reporting.
- **Victim-Centric Remediation:** If modern slavery is identified, Freshmax commits to a victim-centric approach. This includes cooperating with NGOs and authorities for investigations and prioritising the safety and wellbeing of the individual. We maintain the right to terminate commercial contracts where a supplier fails to engage in necessary remediation.
- **Anti-Discrimination & Dispute Resolution:** These frameworks ensure merit-based advancement and structured conflict management. By providing a clear process for resolving grievances, we reduce the vulnerability of marginalised groups within our diverse global team.

Employee Surveys

- Freshmax utilises annual Employee Engagement surveys as a primary data source for measuring organisational health. These surveys provide a direct feedback loop from our frontline and administrative teams, allowing us to identify specific operational and cultural pain points. Rather than viewing the results in isolation, we develop targeted action plans to address identified gaps in our engagement process. Our next scheduled survey in Q3 2026 will serve as a benchmark to measure the effectiveness of current initiatives and will directly inform the refinement of our 2027 engagement strategy.

Targeted Training and capability building

- In recognition of the fundamental need to increase overall awareness and to continuously improve our modern slavery management approach within Freshmax, our QESH team leader attended a specialised Modern Slavery training session. The session covered: common forms of practices, concept of 'risk to people', explanation of the Modern Slavery Act, and suggested approaches for management.

- Additionally, to embed modern slavery awareness within our culture, we deliver modern slavery related training in preferred languages for our Culturally and Linguistically Diverse (CALD) workforce. We are committed to providing modern slavery training inclusively across our workforce.

Employee Assistance Program (EAP) and Independent Support

In partnership with Eudoxia, Freshmax provides a comprehensive, 24/7 professional support service available to all global employees and their immediate families. This program is a critical component of our worker protection framework and includes:

- **Anonymous Rights and Payment Support:** A confidential avenue for employees to report concerns if they feel their workplace rights are being compromised or their entitlements and payments are not being properly honoured. This service is free, external to Freshmax management, and designed to protect the individual from reprisal.
- **Professional Legal and Financial Advisory:** Access to independent, no-cost legal and financial advice to assist employees in navigating complex personal or professional disputes, ensuring they have the resources to understand and claim their full statutory entitlements.
- **Mental Health and Operational Wellbeing:** Proactive psychological support and wellbeing resources to assist staff in managing workplace stress and personal challenges.

By providing these independent and anonymous channels, Freshmax ensures that every team member has a "low-barrier" way to seek remediation and support, which is a key requirement for identifying and addressing potential modern slavery risks at the frontline.



Actions to Manage Risks in Supply Chain

To manage the risks identified in the supply chain the business has implemented a continuous management process.

Audit Programs

Freshmax supply chain partners have completed 44 social audits via the SEDEX platform and 3 supplier audits through Fair Farms during this reporting period. The business is committed to further managing risks within the supply chain with support and cooperation of supply partners.

a. These social compliance mechanisms to verify that workers are treated fairly and safely include but are not limited to:

b. Fundamental areas of social responsibility:

- Labour Standards: Both these audits verify compliance with laws regarding wages, working hours, child labour prevention, and the prohibition of forced labour.
- Health & Safety: Both require an assessment of the physical workplace to ensure safe and hygienic conditions for all staff.

c. Audit Activity standard social auditing protocols:

- Self-Assessment: Both require the supplier to complete a detailed questionnaire (OSA for Fair Farms, SAQ for SEDEX) before the auditor arrives.
- Worker Interviews: Auditors from both programs conduct private, confidential interviews with employees to cross-check documentation against real-world experiences.
- Payroll & Records Review: Both require a deep dive into at least 12 months of payroll data, time sheets, and employment contracts.
- Management Systems: Both evaluate how a business manages its risks, including its oversight of labour hire providers.

d. The reports of these audits are available to Freshmax once the process is completed.

Supplier governance and risk mitigation

- a. Strategic Supplier Onboarding: The supplier onboarding process serves as our primary preventative control for identifying and mitigating Modern Slavery risks before a commercial relationship begins.
- b. Risk-Based Segmentation: Every new supply partner must undergo an initial risk assessment. By categorising suppliers as High, Medium, or Low risk based on their self-assessment data, we can apply a "risk-proportional" approach to our due diligence.
- c. Preventative Design: This design ensures that high-risk entities are flagged for additional scrutiny or independent auditing before they are integrated into our supply chain, preventing the inadvertent engagement of unethical labour practices.

Mandatory Supplier Code of Conduct

As a non-negotiable component of onboarding, all Produce suppliers are required to sign the Freshmax Supplier Code. This code is strategically aligned with the Ethical Trade Initiative (ETI) Base Code and is designed to create a legally binding commitment to international labour standards.

The Code manages risk by mandating strict adherence to the following pillars:

- a. Regulatory Compliance: Explicit alignment with the Modern Slavery Act 2018 (Cth), ensuring all partners understand their legal obligations within the Australian context.
- b. Prohibition of Exploitation: A total ban on all forms of forced, compulsory, or child labour, removing the most severe forms of modern slavery from our procurement footprint.
- c. Safe and Ethical Workplaces: Requirement to provide healthy working environments and ensure the fair treatment of all labourers regarding wages, working hours, and statutory benefits.
- d. Grievance and Reporting: To ensure the Code is enforceable, it includes a requirement for anonymous reporting channels. This is designed to empower workers to report suspected violations directly, providing Freshmax with "on-the-ground" visibility into potential risks that traditional audits might miss

Criterion 5: Describe How Effectiveness is Assessed

Assessing Effectiveness of our Actions (KPIs)

Over the past five years, Freshmax has progressively developed and strengthened its formal approach to identifying, assessing and managing modern slavery risks. This has included the establishment of defined key performance indicators to support continuous improvement and to help measure the effectiveness and outcomes of our actions.

Performance Area	Metric
Supplier Engagement	% Suppliers (by spend) who fall into the high-risk category, have been risk assessed for presence of Modern Slavery risks using SEDEX, FairFarms or CENTRL platform.
	% of High-Risk category by spend Tier 1 suppliers who have completed the Modern Slavery SAQ.
Whistleblower Reporting	Number of reports received via anonymous internal / external channels for Modern Slavery.
Training Reach	% of total workforce who have completed induction and training related to modern slavery policies and standards.
Governance & Policy	Policies & Standards reviewed at regular intervals.

Criterion 6: Describe the Process of Consultation

Consultation and Approval

This statement was developed through a consultation process involving the executive leadership teams of all subsidiary entities and the Group's Quality, Environment, Safety, and Health (QESH) committee team members. Ongoing review and improvements are conducted through consultative processes with all the functions of the business to ensure all risks and issues are identified.

Criterion 7: Any Other Relevant Information

Relevant Information

The Group maintains a systematic approach to workforce protection and engagement. As a component of our broader ethical framework, we have implemented a Standardised Wellbeing Calendar. This initiative provides a structured schedule for the distribution of educational resources and the coordination of health-focused activities. By maintaining regular communication on occupational health and safety (OHS) and mental health awareness, we ensure that our global personnel remain informed of their rights and the support resources available to them, reducing operational risks associated with workplace stress and isolation.

Board Approval and Signature

Approval of the Statement

This statement was approved by the Board of Directors of Freshmax Group Pty Ltd in its capacity as the parent entity of the Group.



Signature: _____

Name: Reg Weine

Title: Group CEO

Date: 30/04/2026



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