



HS Fresh Food Holding Pty Ltd  
**Modern Slavery Statement**  
**FY23**





## About this Statement

This Modern Slavery Statement ('Statement') is made in accordance with the Australian Modern Slavery Act 2018 (Cth). It applies to and describes the steps taken by HS Fresh Food Holding Pty Ltd and its subsidiaries ('HSFF') during the fiscal year ending 30 June 2023 to mitigate modern slavery in HSFF's businesses and supply chain.

## Contents

About this Statement	2
Introduction	6
About HSFF	7
Supply Chain and Impact	10
Mitigating Risks and Addressing Modern Slavery	12
The HSFF Approach	15
Our Assessment	17
Approval	18

*Food for a better life*





**HS Fresh Food Holding Pty Ltd**

**Modern Slavery Statement**

**FY23**

This statement is made under the Modern Slavery Act 2018 (Cth). It sets out the actions taken by HS Fresh Food Holding Pty Ltd.

## Introduction

HS Fresh Food ('HSFF') is a purpose-driven business with the underpinning belief of 'Grow, Create, Flourish'. This is more than a tagline; it represents our underlying ethos of representing, supporting, and improving the environment, people, and products we develop. Our company values – Honesty, Respect, Accountability, and Innovation – are the fundamental pillars by which we steer our business forward.

Emerging from the amalgamation of three Australian-owned businesses, HSFF has its roots in providing great, healthy food for Australians by Australians. With this, HSFF firmly holds its commitment to protecting human rights in its business.

HSFF believes in treating all people with dignity and respect. Aligned with this, we have our Code of Conduct and Supplier Quality Adherence agreement. The introduction of the Modern Slavery Act 2018 (Cth) heightened the focus on protecting human rights and the integrity of its supply chain.

An agricultural business at heart, the growth of HSFF has allowed it to continually develop a framework of guiding principles to ensure continuous improvement in playing our part in the eradication of modern slavery, particularly within the agricultural sector. In Australia, the Modern Slavery Committee has built on this foundation to effectively address regional risk.

HSFF has adopted a zero-tolerance approach to Modern Slavery. We remain ever committed to acting ethically and with integrity in all our business dealings and relationships. The initiatives include, and are not limited to, expanding employee awareness, training programs, assessing suppliers, and placing an ever-increasing focus on identifying and addressing modern slavery risks in our indirect supply chain.



## About HSFF

### Background

HS Fresh Food is a national business that provides Australians with healthy, fresh salad products. We formed in 2020 through the amalgamation of Houston's Farm in Tasmania, JMark in Western Australia, and Sunfresh Salads in South Australia. The Head Office remains in Cambridge, Tasmania, Australia.

A privately owned business, HSFF still operates its own farms that primarily supply the Tasmania and Queensland processing facilities with diverse types of salad leaves. Supplying the retail market through the major retailers, we continue to drive the development of innovative solutions and fresh tasty salads for everyone.

During this statement's reporting period, all entities under HS Fresh Food Holding Pty Ltd (listed below) were actively engaged and consulted. The details and reporting requirements of the Modern Slavery Act 2018 (Cth) were discussed, and information regarding the actions we intend to take was provided, along with the relevant materials and updates.

### Company Structure

#### HS Fresh Food Holding Pty Ltd

ACN: 638 495 673

#### HS Fresh Food Pty Ltd

ACN: 638 495 655

#### HS Fresh Farms Pty Ltd

ACN: 638 495 664

#### HS Salads Pty Ltd

ACN: 640 565 966



## Locations

HSFF operates from six locations across Australia.

### Processing Sites

<b>Tasmania</b>	121 Backhouse Lane Cambridge TAS 7107
<b>South Australia</b>	7-8 Sharp Court Mawson Lakes SA 5095
<b>Queensland</b>	33 Martin Taylor Drive Rocklea QLD 4106
<b>Western Australia</b>	54 Prestige Place Wangara WA 6065

### Farms

<b>Forcett</b>	45 Lewisham Drive Forcett TAS 7173
<b>Daisy Banks</b>	87 Colebrook Road Richmond TAS 7025







## Supply Chain and Impact

### Overview

Over the course of the year, our group of companies employs on average 600 employees and more indirectly through our logistics and supply chain. HSFF is a trusted supplier to major retailers in Australia and other independent customers. We are proud of our place in the national market, the quality products that we produce and the relationships we have cultivated with our many suppliers. The overwhelming majority of our ingredients and packaging requirements are either grown or manufactured in Australia as well as our very own farming operations in Tasmania.

The supply chain of products and services that contribute to our operations includes raw agricultural materials –the top categories being salad vegetables such as lettuce, spinach and other varieties, potatoes, pasta, hard vegetables, and condiments. In the FY23 accounts, the largest category of spend was on agricultural products, and specifically salad leaf. The largest supplier is our internal farms.

### Key Areas of Focus

With the establishment of HS Fresh Food, we have formed a national company with one set of values and policies. We consider the social and environmental impact of every decision we make and strive to be a force for positive change.

We value every individual for who they are and what they bring to the team. These are the values that underpin our mission to ensure that Human Rights and Human Dignity are upheld, including reducing the risk of modern slavery in every deal, every transaction with every trading partner and within our own operations nationwide.

HS Fresh Food not only produces “Food for a Better Life”; we have placed additional targeted emphasis on the critical area of corporate responsibility since the introduction of the Modern Slavery Act 2018 (Cth). We are committed to the eradication of modern slavery, and we will always act quickly and decisively in the best interest of affected workers whomever they are, so they are empowered to “Work for a Better Life”.



## Practices in our Operations and Supply Chain

As our base business has originated through the amalgamation of multiple family businesses, we have treated our employees as family members. HSFF operates according to its core values and understands that there is an inherent risk of exposure to the threat of modern slavery and labour exploitation in food and agriculture supply chains from production and processing to packaging and transportation.

Although HS Fresh Food makes all its purchases via Australian suppliers, we are mindful that certain items are produced overseas –such as packaging and chemicals. HSFF works closely with its suppliers to develop relationships that support mutually beneficial outcomes and strengthen our combined approach to product traceability and human rights.

Policies, contracts, monitoring activities, regular communication, and engagement with our team members and partners are key controls we have established to manage the potential or actual risk of modern slavery in our operations and supply chain. We have a comprehensive set of policies, standards and practices that outline our values and ways of working. We expect our Partners to use the best endeavours to ensure that they do not engage in modern slavery.



## Mitigating Risk and Addressing Modern Slavery

### Overview

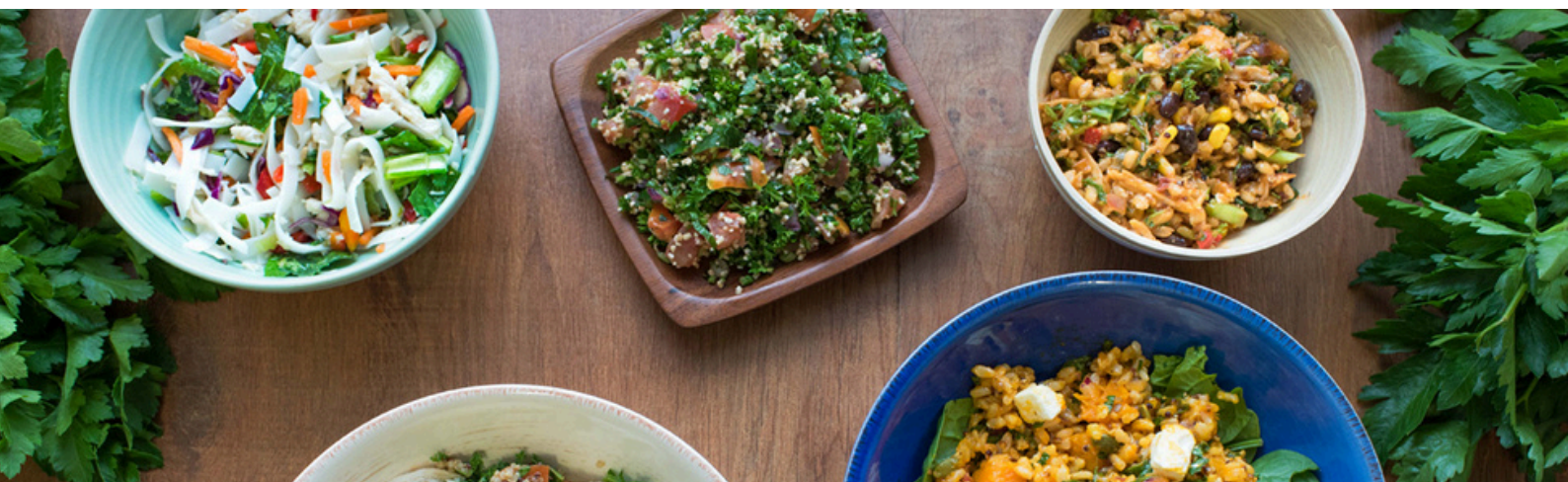
We expect our partners to use their best endeavours to ensure that they do not engage in modern slavery, HS Fresh Food will not knowingly conduct business with suppliers who violate laws relating to employment, the environment or safety, or engage in any other unethical employment practice. We aim to ensure that our team members and suppliers understand our expectations and know how to raise a grievance or complaint should these policies, standards or practices not be followed.

### Internal Reporting

HSFF recognises that modern slavery is an issue globally. We have established reporting procedures where employees and third parties can report any concerns regarding unethical behaviour or conduct within the business including modern slavery and human trafficking. Employees can report any matter to their manager, or if they wish to remain anonymous, all employees and third parties can use our independently operated whistleblower hotline service (Stopline Pty Ltd) via telephone, email, online reporting, smartphone app and by traditional mail.

### Solutions to Address Modern Slavery

The following page outlines the strategies in place to prevent modern slavery in our operations and supply chain.



## Solutions to Address Modern Slavery

### HSFF Code of Conduct

Defines the national behavioural expectations we have of our employees' concerning colleagues, suppliers, customers, and members of the community

### Procurement Policy

Outlines the process for procuring goods and services and requires activities to be conducted in an honest, competitive, fair, and transparent manner

### Enterprise/ Employment Agreements

HSFF has various employment agreements in place across our operations, which cover all our workforce and have been ratified by the Fair Work Commission

### Bribery and non-competitive behaviour

HSFF has strict policies around fraud, bribery, money laundering, corruption, secret commissions, or behaviours that threaten others

### Grievance, Complaints & Anti-Bullying Procedure

Provides a framework and encourages the reporting of instances of suspected unethical, illegal, fraudulent, or undesirable conduct involving HS Fresh Food

## Solutions to Address Modern Slavery

### Site Audits

Our sites are subject to periodic customer audits in line with our contractual obligations

### Supplier Audit Program

HSFF Technical and Farm Teams conduct a vendor assurance program that includes a supplier audit schedule

### Approved Supplier List

HS Fresh Food requires suppliers to meet a set of predetermined standards to do business with us

### Partner Code of Conduct

HSFF expects partners to adhere to all applicable laws and regulations and to use their best endeavours to comply with principles

### Independent Whistleblower Service

All employees have access to a free external hotline where they can advise of any illegal or unethical activity. All claims are independently investigated.

## The HSFF Approach

Our approach consists of five key stages that act both independently and interdependently. Combined, these five key stages enable us to play our part in abolishing modern slavery.

### The 5 Stages

#### Enhance Policies

HSFF believes that strong internal policies and systems are a key aspect of managing and mitigating the risk of modern slavery in its operations and supply chain. HSFF expects the same level of diligence regarding the protection of human rights from its suppliers as from its employees.

These policies and other programs –such as quality adherence and sustainability programs, ensure that team members and suppliers are dedicated to managing social, ethical, and environmental issues in a responsible manner.

#### Communication

This involves communicating with our suppliers about HSFF’s modern slavery requirements and providing general awareness and education surrounding this issue. We see that through appropriate communication and education, we can aid in abolishing modern slavery through the businesses we work alongside.

#### Employee Training and Compliance

We continue to implement innovative programs to increase employee awareness and engagement regarding modern slavery. Through 2023, we have been communicating with all staff about modern slavery – including the risks, signs to be aware of, and means by which to raise attention to the issue.

#### Supplier Assessment

We will conduct risks assessments across our local, national, and international supply chains

#### Supplier Contracts

A review of our supplier contracts will be conducted. Any requiring updates or changes pertaining to modern slavery will be prioritised and rectified immediately. We will work with our trading partners to ensure adherence to the Modern Slavery Act 2018 (Cth).







## Our Assessment

To date, no instances of modern slavery have been identified in our supply chain.

HS Fresh Food's belief that 'good ethics' is good business, has guided it from paddock to plate, and is the basis of its values. Through this fundamental ideology, HSFF has built relationships with growers spanning many years and is recognized for its commitment to sustainability.

It is through these strong relationships and regular contact with suppliers that we can regularly review our supplier assessment process, along with our suppliers' adherence to our processes.

Our existing policies are monitored regularly, and we will conduct regular audits of the modern slavery program. We will continue to evaluate suppliers and practices. The extent of actions taken to address modern slavery risks will be measured by certain quantitative metrics, such as the number of individuals trained, contracts signed with appropriate modern slavery contractual provisions, and the number of audits undertaken.

More importantly, the effectiveness of actions undertaken will be assessed by means of metrics, such as complaints via the grievance and complaints process and investigations launched, if any, and the number of successful audits and resolved non-compliances generated in ethical audits if any.

HS Fresh Food will continue to work closely with our team members and suppliers to further understand the potential risks of modern slavery in our supply chain. We are committed to further embedding our policies, standards, and practices across our business.

Through these actions, we believe we are helping to raise awareness of modern slavery and the actions required to effect change.



## Approval

This statement was approved by the Board of HS Fresh Food Holding Pty Ltd on 29th May 2024.

A handwritten signature in black ink, appearing to read "Michal Wallas", with a horizontal line underneath.

**Michal Wallas**  
**Chairman of the Board**  
**HS Fresh Food Holding Pty Ltd**





*Food for a better life*