



# Modern Slavery Statement

1 JULY 2024 –  
30 JUNE 2025

**SPC GLOBAL HOLDINGS LTD**  
ACN 150 015 446

## Reporting Entity & Structure

This Modern Slavery Statement (**Statement**) is made pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the **Act**) for the period of 1 July 2024 to 30 June 2025 (the **Reporting Period**).

In this Statement, the terms “**SPC**”, “**SPC Global**”, the “**Company**”, “**Reporting Entity**”, “**the Group**”, “**our business**”, “**organisation**”, “**we**”, “**us**”, and “**our**” refer to SPC Global Holdings Limited (ACN 150 015 446), unless otherwise stated. SPC Global Holdings Limited is a publicly listed company on the Australian Securities Exchange (ASX Code: SPG). To find out more about our business, you can visit [SPC Global Group](#)

This Statement is made by SPC Global but it incorporates all the wholly-owned subsidiaries listed in Appendix 2 and Appendix 3. As we adopt an enterprise-wide approach to our operations and risk management, all SPC Global entities are included in the Statement, even if they are not defined as reporting entities under the Act.

During the Reporting Period, SPC Global underwent a period of transformation. On 17 December 2024, the company re-listed on the ASX, merging four entities – SPC, The Original Juice Co, Nature One Dairy and Natural Ingredients. Of these entities, only some of the businesses under the SPC business division - SPC Global Ltd (ACN 633 389 394) and its wholly owned subsidiary, SPC Operations Pty Ltd (ACN 633 532 162) - have been previously required to report on Modern Slavery.

This is our first Statement as a merged entity.

Our next Modern Slavery Statement will report for the year 1 July 2025 – 30 June 2026.

This Statement describes the risk of modern slavery in SPC Global’s own operations and our supply chain for the Reporting Period.

It outlines actions taken by SPC Global to assess and address the risks and explains how we evaluate the effectiveness of these measures. The term ‘modern slavery,’ as used in this Statement, takes the meaning given to it in the Act.





## Introduction to SPC Global

SPC Global is a leading Australian food and beverage company, which consists of four business divisions – SPC, Nature One, The Original Beverage Co., and Natural Ingredients.

SPC Global (ASX:SPG) re-listed on the ASX in December 2024 following the merger of these companies, and while we have a deep brand heritage, SPC Global was only six months old at the end of the Reporting Period.

Our SPC business division is the largest and most well-known, stemming from humble beginnings as a growers' co-operative more than 100 years ago. Today, across the Group we have a broad portfolio of complementary products which are loved by consumers, ranging across packaged fruit, tomatoes, baked beans and spaghetti, ready-made meals, beverages, juice and wellness shots, powered milk supplements and we supply of fruit and vegetables to the food service industry.

SPC Global is undergoing a transformation to become a truly global food and beverage business, admired for its brands, delivering exceptional performance and creating value for all its stakeholders.

We have recently launched a new company Mission, Vision and Values which we have recently rolled out and are currently embedding across all our business divisions.

As we expand across Australia and internationally, we remain true to the values that have shaped our company to date - integrity in all we do, care for our people and our communities and delivering value to our stakeholders.

We are proud of our past, excited for the future, and dedicated to ensuring that our products and brands provide positive outcomes, helping to nourish consumers so they can enjoy good health and wellness.

## Our Mission, Vision and Values



Our mission is to reimagine nourishment and wellness for consumers globally. Our values guide our decisions, shape our culture, and drive our commitment to creating a positive impact on the world. Here are the core values that we have selected to help guide our behaviours:

- **Accountability** - We take ownership, empower others, persevere and deliver on our commitments
- **Collaboration** - We work together to achieve better outcomes
- **Integrity** - We do what's right — with respect, honesty, fairness and transparency
- **Care** - We listen, support and consider our people and the communities where we operate, ensuring quality and safety in all we do
- **Agility** - We innovate, adapt and act differently to move forward
- **Curiosity** - We explore new ideas, challenge assumptions and keep learning

## Our Brands and Products



We manufacture, market and distribute a diverse range of food and beverage products.

**SPC**, based in the Goulburn Valley region of Victoria, Australia, produces packaged fruit, fruit snacks, tomatoes, baked beans and tinned spaghetti under the SPC brand.

The business division also produces tomato and fruit products under the Ardmona brand and premium packed fruit under the Goulburn Valley brand. SPC Provital is a range of functional and naturally enhanced foods. The Good Meal Co produces frozen meals which are delivered directly to consumers or businesses. The company is a NDIS (National Disability Insurance Scheme) certified provider serving individuals at home, as well as in hospitals and aged care facilities in NSW.

**The Original Beverage Co.** focuses on high-value premium beverage products that provide genuine health and wellness benefits for consumers. The company's own brands include the Original Juice Co. which manufactures juice products and Juice Lab, a range of plant-based wellness shots with functional benefits. The Original Beverage Co has formed strategic partnerships with three emerging beverage companies: Posca Hydrate, a hydration drink; Naked Life, a brand focused on sugar free beverages such as sodas, iced teas and nootropics, and non-alcohol cocktails; and Eclectic Group, with whom we will launch a range of functional beverages.



**Nature One** is a manufacturer and distributor of powdered milk products, including infant formula and various nutritional supplements. Its products are marketed under several brands such as Nature One Dairy, Ripple, WhiteH2O, and others.

The company serves as the international division of SPC Global and is the driving force behind expanding our reach across international markets.

Nature One owns and operates a state-of-the-art milk powder manufacturing facility in Carrum Downs, Victoria, and maintains international offices in Singapore and Hong Kong. The company has established strong sales and marketing footprints across the Asia-Pacific region, including Australia, Cambodia, China, Hong Kong, Indonesia, Malaysia, Myanmar, Singapore, and Vietnam.

In addition to its physical presence, Nature One has forged eCommerce agreements with major online retailers in China, Singapore, Australia, and the United States, allowing the company to meet the evolving needs of modern consumers through convenient, direct-to-door delivery channel.

By combining advanced manufacturing capabilities, strategic regional offices, and robust digital platforms, Nature One continues to expand its footprint across international markets, reinforcing its position as a key contributor to SPC Global’s international growth strategy and a trusted provider of high-quality nutritional products worldwide.

**Natural Ingredients** is an Australian ingredients business and has been servicing the food industries with plant-based ingredients for manufacturing, food service and retail more than 15 years.

## Operations and Supply Chain

SPC Global is dedicated to promoting a workplace where our employees feel safe, supported, and valued. We actively promote inclusivity in our working environment and hiring practices, placing a strong emphasis on gender diversity and equal opportunities for all employees.

SPC Global's headquarters are in Melbourne, and its largest manufacturing site is situated in Shepparton, within the Goulburn Valley region of Victoria. The Shepparton facility comprises a manufacturing plant, the National Distribution Centre (NDC), quality control and

testing laboratories, training facilities, and administrative offices.

Additionally, SPC Global operates manufacturing facilities in Carrum Downs, Victoria (milk powder processing), Mill Park, Victoria (juice production and Auburn, NSW (frozen meals manufacturing). We also have sales offices in Singapore and Hong Kong. During the Reporting Period, we also had a tropical fruit processing plant in Thailand, however, this facility is no longer under the ownership of SPC Global.



## Risk of Modern Slavery Practices in Our Operations

SPC Global adopts a risk-based approach to modern slavery due diligence in our operations and supply chain, with a primary focus on the human rights of our employees, contractors and those employed by our suppliers.

During this Reporting Period, SPC Global assessed the actual risk of modern slavery in our operations as **low**. This determination is based on the following initiatives and measures:

- The majority of SPC Global team members are directly employed by an SPC Global employing entity, primarily in Australia, and their engagement terms adhere to and comply with relevant Federal and State laws.
- SPC Global maintains a dedicated team of Human Resources specialists responsible for overseeing compliance with regulatory requirements related to the working conditions and pay of our team members.
- SPC Global team members actively engage with and often hold memberships in unions, affording them the freedom to collectively negotiate working terms and conditions. If necessary, third parties, such as unions, can participate in these negotiations.
- SPC Global monitors the risk of modern slavery in our operations through regular employee engagement surveys and the assessment of grievances raised by team members. The Human Resources team, along with a 24-hour anonymous whistleblower helpline (**Stoptline**), facilitates this process. Whilst an engagement survey wasn't conducted during the 2024-25 Reporting Period due to the merger, preparation has commenced for an engagement survey in 2026.
- A new Whistleblower Protection Policy has been developed for all entities within the SPC Global Group and has been approved by the SPC Global Board of Directors. A copy of this policy can be found here on our corporate website [Whistleblower Protection Policy](#).
- SPC Global respects the freedom of choice for employers, employees, and independent contractors regarding their decision to join a union or employer association or to participate in organised industrial activities. This commitment to freedom of choice is embedded in our approach to labour relations.

## Risk of Modern Slavery Practices in our Supply Chain

SPC Global collaborates with more than 1000 goods and services suppliers, which includes raw ingredients suppliers, packaging suppliers, cleaning and security services, transport and logistics providers, waste disposal companies, and professional services such as advertising agencies. The vast majority of our suppliers are local to our manufacturing facilities, sales offices or head office. This allows us to maintain close collaboration with our supplier organisations. Our business representatives regularly visit suppliers to assess their processes and practices against our Modern Slavery Policy requirements.

More than 90% of the ingredients used by our businesses during the Reporting Period were sourced from Australia. Products processed at our Shepparton facility are predominantly sourced from the Goulburn Valley, including tomatoes, pears, peaches, apricots, plums, and apples. Our Mill Park facility processes juice, the majority of which is sourced from Australian farmers.

Our Nature One Dairy facility manufactures milk powder products. It operates from Carrum Downs located close to Victoria's Gippsland region from where the company sources most of its dairy products.

We have partnerships with more than 70 growers, who are a vital part of our supply chain. Good relationships with our partners are essential to the overall success of our business. We adopt a collaborative approach with our growers and regularly visit their sites.

We require all our suppliers to grant us access to the Supplier's Self-Assessment Questionnaire (SAQ) and SMETA information. Based on a review of the information available, each supplier is categorised as low, medium, or high risk based on several factors, including geographical location (with a focus on known high-risk countries), the type of goods and services supplied.

As a newly merged business we will be undertaking a review of our complete supplier base in 2025/26 to assess our overall Modern Slavery risk profile. We will use information gathered from the questionnaire and SMETA information and will develop a profile of our low, medium and high-risk suppliers.

SPC Global understands the importance of ongoing monitoring of all our suppliers and continues to monitor all suppliers, whether engaged directly and indirectly. This is completed as part of the regular supplier and contract review and renewal processes.

## Effectiveness of the risk assessments and follow up actions

During the Reporting Period, the SPC business unit monitored its Modern Slavery risks through SMETA Audits and other systems the company has in place, including Stopleveline (the 24-hour anonymous whistleblower helpline) and a generic SPC compliance mailbox, [compliance@spc.com.au](mailto:compliance@spc.com.au), where suppliers can escalate concerns relating to modern slavery. The SPC business required each of its suppliers to confirm its acceptance of SPC's Supplier Code of Conduct Policy by completing and returning a Supplier Declaration Form to [compliance@spc.com.au](mailto:compliance@spc.com.au).

No incidents of Modern Slavery were reported through any of these systems.

SPC Global is satisfied the SPC business unit review and assessment processes were effective based on the resources available. SPC Global recognises this is a constantly evolving area requiring close monitoring and process improvements. We will continue to monitor the effectiveness of our risk assessment processes and actions across the entire merged business in the next reporting period. Since the merger of the four companies (which occurred half-way through the Reporting Period) we have established a dedicated working group with responsibility for assessing, monitoring and driving actions to mitigate any risks of Modern Slavery. The working group has members from the various business divisions and functions of the Group

to ensure the breadth of total operations is captured.

In addition to the risk assessment activities described in the previous sections, SPC Global's initiatives related to social compliance are guided by our commitment to providing a healthy and safe work environment for our people. Our objective is to maintain a culture of zero tolerance for any harm or injury to our employees, contractors, and visitors.

Whilst an identified action in the last report was to deliver formal Modern Slavery training, this was postponed to allow for the creation of a Group-wide Modern Slavery Policy and to allow the Group to focus on the implementation of the merger and subsequent integration of new businesses. As such, the training which was developed early in the 2024/25 period will be reviewed to ensure it is relevant to the merged business and will be delivered across the Group in the next reporting period.

In addition to the development of the Modern Slavery Policy (the Group-wide Policy at the time of submission of this Statement is undergoing the Board approval process), KPIs, risk assessments and supplier questionnaires have been developed and will continue to be rolled out across all businesses in 2025/26.

The effectiveness of these actions will be regularly assessed once implemented.

## Supplier Code of Conduct

The Supplier Code of Conduct provides an opportunity for SPC Global entities to communicate our position on ethical practices and set clear expectations for suppliers wishing to work with us. We include Modern Slavery clauses in our procurement and supply agreements where relevant to help ensure, from a contractual perspective, that our suppliers' values are aligned with our values and that they are committed to eliminating Modern Slavery from their own supply chains.

Our contracted suppliers are obligated to make their best efforts to comply with the principles outlined in our Supplier Code of Conduct or their own Code of Conduct if it is based on the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the principles outlined in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

## SPC Global Employee Code of Conduct

In bringing the four business divisions together as SPC Global, a new Employee Code of Conduct is being developed, which will outline our commitment to a safe, harmonious, and professional working environment, free of discrimination, bullying, and harassment. The Code will incorporate our new company values, which were developed during the reporting period with employee input. Once approved by the Board, the Code will be rolled out across the Group, along with other associated policies.

The Code will outline the conduct and behaviour standards expected from all members of our business. Additionally, it will reflect the expectations placed on us by our

We are in the process of updating and rolling out the SPC Global Child Employment Policy across all of our companies. This policy also applies to all suppliers, contractors, subcontractors and labour providers working with our company. We expect all our suppliers to implement age-verification systems and maintain and enforce policies to prevent child labour. The Company will conduct due-diligence checks including audits, supplier declarations and assessments to ensure compliance throughout the supply chain. Non-compliant suppliers may be suspended or removed if appropriate steps are not taken to implement required changes to bring the supplier in line with our policy.

SPC Global has found direct contractual obligations to be a highly effective way of ensuring suppliers are committed to high standards of ethical and legal practices.

customers, suppliers, the community and regulators.

The Code of Conduct will apply to all senior executives, employees and representatives of the SPC Global Group. It will also include people who work at the direction of, or on behalf of SPC Global (including agents, contractors, subcontractors, consultants and temporary staff). All new and existing employees will be required to complete training on the SPC Global Code of Conduct annually.

Additionally, we have a separate Code of Conduct for our directors, which is published on our corporate website, as part of our [Corporate Governance Plan](#).

## Whistleblower Policy

A new Whistleblower Protection Policy has been developed for all companies within the SPC Global Group and has received Board approval. A copy of the [Whistleblower Protection Policy](#) can be found on our corporate website: [spcglobalgroup.com](http://spcglobalgroup.com)

This policy encourages and supports people to feel confident to speak up safely and securely if they become aware of wrong-doing or illegal or improper conduct anywhere within the operations of the Group or anywhere else connected with the Group. It set outs a confidential process for our employees and contractors to report concerns, including those related to modern slavery. Protection and anonymity is provided to individuals making reports to ensure there is an avenue to raise concerns without fear of retribution.

During the Reporting Period, neither SPC Global nor its subsidiaries received any

complaints concerning the risk of modern slavery in our operations or the supply chain. This is despite the process being regularly utilised by our people to report on other matters, showing it is an effective monitoring program.

At SPC Global, we are dedicated to providing a healthy and safe work environment that prioritises the wellbeing of our people. Continuous improvement is integral to our safety practices, and we believe that everyone plays a role in making SPC Global a safe place to work, both physically and psychologically. Safety is our top priority for everyone, and together we can make a significant impact on the health, safety, and wellbeing of our people.

## Employee Assistance Program

Telus Health is SPC Global's Employee Assistance Program (EAP) provider. Telus Health has skilled clinicians available to confidentially discuss any concerns that our employees or their immediate family may be facing.

The EAP can be contacted 24 hours per day, 7 days per week at no cost to employees. The EAP offers timely, qualified assistance and support to help manage life's complexities.



## The Road Ahead & Future Commitments

The following actions are planned for implementation during 2025/26 (with many already in progress):

- Publish the Board-approved SPC Global Modern Slavery Policy on our corporate website.
- Recognising the need for a more sophisticated approach to procurement, SPC Global restructured its Procurement function during the reporting period, to centralise procurement services from across the different business units and upweight the skills of the procurement team with senior appointments. A new General Manager Procurement will commence with the business in December 2025, with this role, along with others in the Procurement team, having responsibilities for managing Modern Slavery obligations.
- A cross functional working group will continue to meet regularly throughout the year to review risk assessments, specific cases, reports and actions relating to modern slavery obligations. This working group consists of representatives from Procurement, Supply Chain, Human Resources, Health & Safety, Finance, Legal and Corporate Affairs.
- Group-wide modern slavery training for all relevant employees and contractors.
- Implementation of the updated modern slavery policies, KPIs, risk assessments and supplier questionnaires which were developed in this Reporting Period.
- Refining our procedure for responding to modern slavery cases that we may become aware of as part of the continuous due diligence process. It is anticipated that focus on this will be included as part of SPC Global's review of its responsible sourcing standards in the next reporting period.
- Introduction of Group-wide policies that help to ensure our people are safe and free from harm, including the harm of Modern Slavery. These policies include our Child Employment Policy, Human Rights Policy, Workplace Respect Policy and Employee Code of Conduct.

## Consultation, Approval and Signature

SPC Global prepared this Statement with an interdisciplinary approach and sought input from the Commercial (Sales and Marketing), Supply Chain & Operations, Procurement, Legal and Corporate Affairs, Human Resources and Finance functions which work across all Group entities.

The Board of Directors and the Executive Team which are the principal governing bodies of all the Group entities covered by this Statement were provided with drafts of the Statement for review and provided commentary during the consultation process. The Statement was, therefore, prepared in consultation with the

Board of Directors and Executive Team of SPC Global Holdings Ltd.

The final version of the Statement was presented to the Board of Directors on 17 December 2025 and the Statement was approved on the same date.

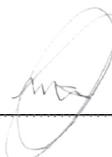
In accordance with the Act, this Statement is signed by Andrew Reitzer as Chairperson of SPC Global and Robert Iervasi as Managing Director of SPC Global. Mr Reitzer and Mr Iervasi are the responsible members of each of the Group entities and sign this Statement in that capacity.

Signed:



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Robert Iervasi  
Managing Director  
SPC Global Holdings Ltd



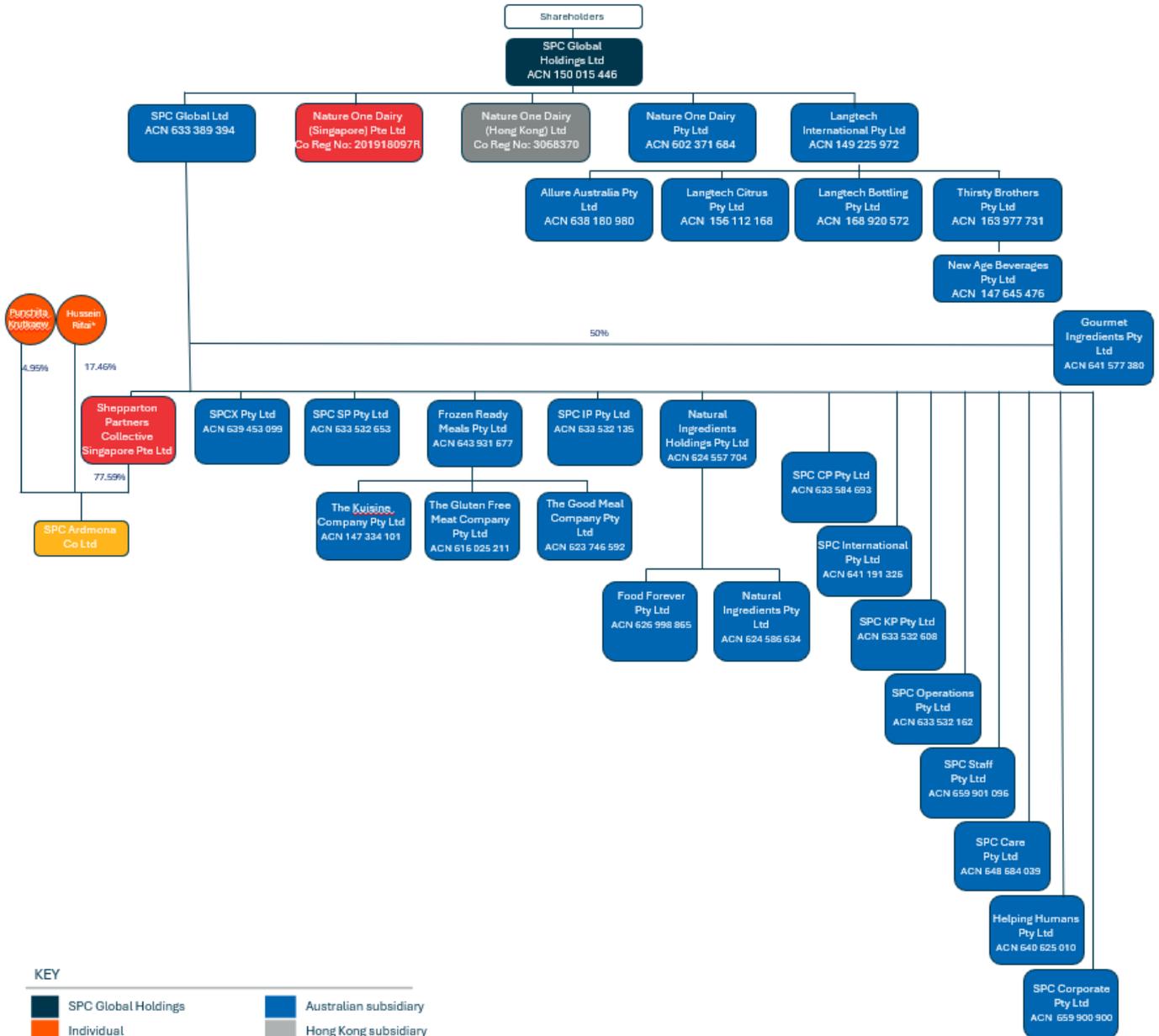
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Andrew Reitzer  
Chairperson  
SPC Global Holdings Ltd

## Appendix 1: Disclosure Matrix

	<b>Mandatory Criteria</b>	<b>Disclosure reference</b>
1.	Consultation and Approval	Page 14
2.	Identify the reporting entity	Page 2
3.	Describe the reporting entity's structure, operations, and supply chains	Pages 3-7
4.	Describe the risks of modern slavery practices in the operation and supply chains of the reporting entity and any entities it owns or controls	Page 8
5.	Describe the actions taken by the reporting entity and any entity it controls to assess and address these risks, including due diligence and remediation processes.	Page 9
6.	Describe how the reporting entity assesses the effectiveness of these actions	Page 10

## Appendix 2: Company Structure



**KEY**

- SPC Global Holdings
- Individual
- Australian subsidiary
- Hong Kong subsidiary
- Thailand subsidiary
- Singapore subsidiary

100% ownership unless otherwise stated

\*Note: Hussein Rifai holds shares in SPC Ardmona Co Ltd on trust for SPC

## Appendix 3: Consolidated Entity Disclosure Statement

As at 30 June 2025

Published in the SPC Global Annual Report 2025, which can be found at [spcglobalgroup.com](http://spcglobalgroup.com)

Entity name	Entity type	Country of incorporation	% share capital held	Tax residency
SPC Global Limited	Body corporate	Australia	100%	Australia
SPC Operations Pty Ltd	Body corporate	Australia	100%	Australia
SPC SP Pty Ltd	Body corporate	Australia	100%	Australia
SPC KP Pty Ltd	Body corporate	Australia	100%	Australia
SPC CP Pty Ltd	Body corporate	Australia	100%	Australia
SPC IP Pty Ltd	Body corporate	Australia	100%	Australia
SPCX Pty Ltd	Body corporate	Australia	100%	Australia
SPC Care Pty Ltd	Body corporate	Australia	100%	Australia
SPC Corporate Pty Ltd	Body corporate	Australia	100%	Australia
SPC Staff Pty Limited	Body corporate	Australia	100%	Australia
Shepparton Partners Collective Singapore Pte. Ltd.	Body corporate	Singapore	100%	Singapore
Frozen Ready Meals Pty Ltd	Body corporate	Australia	100%	Australia
The Kuisine Company Pty Ltd	Body corporate	Australia	100%	Australia
The Good Meal Co Pty Ltd	Body corporate	Australia	100%	Australia
The Gluten Free Meal Company Pty Ltd	Body corporate	Australia	100%	Australia
Helping Humans Pty Ltd	Body corporate	Australia	100%	Australia
Gourmet Ingredients Pty Ltd	Body corporate	Australia	50%	Australia
SPC Ardmona Co Ltd	Body corporate	Thailand	82%	Thailand
Natural Ingredients Holdings Pty Ltd	Body corporate	Australia	100%	Australia
Natural Ingredients Pty Ltd	Body corporate	Australia	100%	Australia
Food Forever Pty Ltd	Body corporate	Australia	100%	Australia
Langtech Bottling Pty Ltd	Body corporate	Australia	100%	Australia
Langtech International Pty Ltd	Body corporate	Australia	100%	Australia
Langtech Citrus Pty Ltd	Body corporate	Australia	100%	Australia
Thirsty Brothers Pty Ltd	Body corporate	Australia	100%	Australia
Allure Australia Pty Ltd	Body corporate	Australia	100%	Australia
New Age Beverages Pty Ltd	Body corporate	Australia	100%	Australia
Nature One Dairy Pty Ltd	Body corporate	Australia	100%	Australia
Nature One Dairy (Hong Kong) Ltd	Body corporate	Hong Kong	100%	Hong Kong
Nature One Dairy (Singapore) Ltd	Body corporate	Singapore	100%	Singapore