

Modern Slavery Statement 2025

Our 2025 Modern Slavery Statement – at a glance.

Criterion #	Summary	Page #
1. Identify reporting:	<p>Horticulture Innovation Australia Limited [ABN 71 602 100 149] ('Hort Innovation') is an unlisted public company limited by guarantee and the declared industry services body for horticulture under the <i>Primary Industries Levies and Charges Disbursement Act 2024 (Cth)</i>.</p> <p>We partner with Australian and international co-investors including government, and leading science, technology, and consumer strategy experts to invest in research and development, marketing and trade campaigns for the benefit of the horticulture industry.</p>	4
2. Describe the reporting entity's structure, operations and supply chain:		
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it controls:	<p>Hort Innovation is a typical services organisation and 86% per cent of our expenses are allocated to procuring R&D programs and marketing campaigns on behalf of the horticulture industry.</p> <p>Based on the number and value of our operations, we are confident there is a low risk of modern slavery occurring in either Hort Innovation itself or in our supply chains, with a small number of exceptions as described in this statement.</p>	6-7
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes:	<p>During the reporting period, Hort Innovation has taken a number of actions to assess and address risks, including:</p> <ul style="list-style-type: none"> review of our Risk Appetite Statement to articulate the Board's low risk appetite for delivery partners being linked to modern slavery practices. review of the Compliance Policy setting out the Board's expectations including for the <i>Modern Slavery Act</i>. enhancement to the Compliance Management System to focus on 13 core compliance modules including modern slavery. This more clearly allocates accountabilities and responsibilities for compliance and is reported to the board by a letter of assurance process. re-design of the supplier modern slavery questionnaire as part of the tender (or pre-contracting) stage. This questionnaire now includes links to the Horticulture Showcase, a virtual hub of workplace information and resources provided by the Fair Work Ombudsman and to the reporting hotline managed by the Australian Federal Policy. 	8
5. Describe how the reporting entity assesses the effectiveness of these actions:	<p>As noted in our previous statements, we have moved from the broader, compliance-based approach to the more targeted, risk-based one outlined here.</p> <p>This will provide for greater focus on higher risk-entities and a more accurate assessment of the effectiveness of these actions</p>	9
6. Describe the process of consultation with any entities the reporting entity owns or controls:	We do not own or control any other entities and therefore this criterion is not applicable.	9
7. Any other relevant information:	A number of actions are planned during FY26 to enhance our modern slavery risks controls.	9

Message from our Chair

Hort Innovation is a leading rural research and development corporation (RDC) with a vision and plan for a prosperous and sustainable Australian horticulture industry built on innovation.

A key element of our strategy is quality compliance and governance. We therefore remain committed to upholding the highest standards of ethical conduct and transparency across our operations and supply chains.

As part of this commitment, we welcome the recent reforms to the Modern Slavery Act 2018 (Cth), including the establishment of the Australian Anti-Slavery Commissioner and the Commonwealth Government's response to the statutory review of the Act.

These developments mark a significant step forward in strengthening Australia's national response to modern slavery. The introduction of expanded reporting criteria and the potential for civil penalties underscore the importance of meaningful engagement with modern slavery risks. We particularly support the Commissioner's role in providing independent guidance and promoting collaboration across sectors.

Hort Innovation looks forward to engaging with the evolving compliance landscape and contributing to the broader effort to eliminate modern slavery. We are committed to

continuous improvement in our risk management practices and welcome the opportunity to align with emerging best practices and regulatory expectations.

We reaffirm our dedication to transparency, accountability, and leadership in this critical area. As we have noted in previous statements, the risk of modern slavery in our operations and supply chains is low given the nature of our operations.

This statement was approved by the full Board in their capacity as the principal governing body of Horticulture Innovation Australia Ltd at its regular meeting on 18-19 November 2025.

This statement was signed by me in my capacity as Chair of Hort Innovation on 19 November 2025.



Julie Bird
Hort Innovation Chair

Criterion 1: Identify the reporting entity

Criterion 2: Describe the reporting entity's structure, operations and supply chain.

Horticulture Innovation Australia Ltd [ABN 71 602 100 149] ('Hort Innovation') is an unlisted public company limited by guarantee, and a charity registered with the Australian Charities and Not-for-profits Commission (ACNC).

We are a grower-owned, not-for-profit rural research and development corporation (RDC) and the declared industry services body for horticulture under the *Primary Industries Levies and Charges Disbursement Act 2024 (Cth)*. The effect of this declaration is to allow the company to receive funding from the Commonwealth Government via the Department of Agriculture, Fisheries and Forestry (DAFF) in accordance with a Statutory Funding Agreement (SFA). A requirement of this agreement is to maintain a framework of good corporate governance in order to ensure proper use of funds and voluntary contributions. Demonstrating that no funds are used improperly, for example, in facilitating modern slavery, is therefore a fundamental compliance obligation.

In 2024-25 the company's comprehensive income was \$210.6m (\$7.9m up from \$202.7m in 2023-24). This category included matched funds from the Commonwealth Government and co-investment from other entities, proceeds from statutory and voluntary levies from horticulture growers, and royalty and interest income. Under the

Modern Slavery Act 2018 (Cth), we are a reporting entity as our turnover was greater than \$100m.

We partner with Australian and international co-investors including government, leading science, technology, and consumer strategy experts to invest in research and development, marketing and trade campaigns. In FY25 our main expenses were 'Research and Development Programs' \$150.8m (\$11.8m up from \$139m) and 'Marketing Programs' \$21.7m (\$1.1m up from \$20.6m). As detailed elsewhere in this statement, the nature of these outputs (mainly research data, resources, intellectual property and communication and trade marketing campaigns for the benefit of the industry) and the method of their generation (generally conducted by delivery partners which are mainly well-regulated government departments, universities and public research institutions) means the risk of modern slavery in these supply chains is considered low. We also reported 'Administrative Expenses' of \$27.9m (\$3.9m up from \$24.1m) and occupancy expenses of \$0.5m. These are generally delivered through standard form agreements in terms set out by the provider, the majority of which are established suppliers. Our exposure to the risk of modern slavery through our use of these corporate services and

their respective supply chains is similar to those of any other medium-sized Australian organisation.

The Hort Innovation head office is located at Level 7, 141 Walker Street North Sydney NSW, Australia. We also have small offices in Melbourne and Brisbane and several regional locations.

Hort Innovation does not maintain any operations or offices in foreign jurisdictions, nor do we have any subsidiaries. From time-to-time we participate in international trade shows and campaigns on behalf of the horticulture industry for example Asia Fruit Logistica in Hong Kong.

Hort Innovation is governed by its Board and three subcommittees, including the Audit and Risk Committee, which reviewed and endorsed this statement on 16 October 2025. Under the terms of the Charter of the Committees of the Board, the statement was subsequently approved by the Board on 19 November 2025.

Hort Innovation is led by its Chief Executive Officer (CEO) who reports to the Board. The CEO leads a team of six executives, each with their respective teams.

Employee details over the previous three financial years are shown in **Table 1**.

Table 1: Hort Innovation employees

	2023-24	2024-25	2025-26
Board Members, Directors, Partners and Executive Officers	9	9	9
Full Time Employees (excluding above)	79	74	91
Part-time & Casual Employees	10	18	15
Independent Contractors	4	6	0
Voluntary Workers (incl Work Experience)	0	1	2
TOTAL	102	108	117

Employees are covered by the *Fair Work Act 2009 (Cth)* and workplace safety, conditions and culture are overseen by another subcommittee of the Board, the People and Performance Committee.

Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it controls.

Hort Innovation is a service organisation and we continue to conduct business primarily with other Australian-based service organisations.

The risk evaluation of our operations has been undertaken using the criterion provided in the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (May 2023)¹ and presented in Table 2. This evaluation suggests the risk of modern slavery in our operations and supply chains is low.

In order to undertake this evaluation, we identified the key elements of our operations and supply chains at a thematic level and used a number risk types (sector and industry; product and service; geographic; and entity) to consider the overall risk of modern slavery occurring in each. These are presented in Table 3 below following the general sequence of our inputs – levies from horticulture producers remitted to us via the Commonwealth Government, generally matched on a fifty cents-for-dollar basis - and our outputs – research, development and extension (RDE), trade and marketing activities.

Table 3 shows the risk when dealing with international delivery partners or participating in events such as trade shows is 'moderate'. We conducted specific risk evaluations of the two main international events in which Hort Innovation participates – Asia Food Logistica in Hong Kong and Gulf Foods in Dubai. The Asia Food Logistica event itself is not flagged for specific abuses, but the sector and jurisdiction present moderate risks. Similarly, while there is no direct evidence linking Gulf Foods itself to modern slavery, the labour environment in Dubai—especially for event logistics, hospitality, and construction—presents a very high risk. Thus, using standard risk evaluation methodology, the **likelihood** of modern slavery occurring in the delivery of these events is 'likely' and the **consequence** (to Hort Innovation) is '**insignificant**' providing an overall risk rating of 'medium'. This is not to diminish the seriousness of the risk, rather a recognition of the lack of leverage Hort Innovation, as one of many exhibitors at these events, could have on these practices.

While Hort Innovation's leverage is low with many entities in our supply chain, during FY25 a Supplier Code of Conduct was introduced which provides additional clarity to suppliers of their obligations under their agreements with Hort Innovation regarding modern slavery. Additionally, the contractor used for building the exhibition stand at the Asia Food Logistica event completed a modern slavery questionnaire as part of the pre-contracting stage.

Table 2: Hort Innovation – risks of modern slavery

Risk description	Risk rating (after internal controls applied)
Risk that we may cause modern slavery practices (for example by our own employment practices)	Low
Risks that we may contribute to modern slavery practices (for example, by setting targets for our delivery partners which causes them to put unrealistic demands on their own staff)	Low
Risks that we may be directly linked to modern slavery practices (for example by purchasing IT goods or services from companies that use exploited labour)	Low

Table 3: Overall risk rating of elements of our operations and supply chains

Entity	Likelihood of modern slavery risk occurring	Consequence of modern slavery occurring	Overall risk rating
Horticulture producers and levy payers			
	Possible	Moderate	Medium
Our corporate service partners			
IT and technology (e.g., IT platforms)	Possible	Insignificant	Low
Facilities management and business services (e.g., couriers, office supplies, catering)	Possible	Insignificant	Low
Professional services (e.g., audit, legal, other consultancies)	Rare	Insignificant	Low
International procurement services (e.g., trade show displays, merchandise)	Likely	Insignificant	Moderate
Trade partners (e.g., Austrade)	Rare	Minor	Low
Our project delivery partners			
Advisory mechanisms	Rare	Minor	Low
Commonwealth, State and Territory Government agencies or statutory authorities	Rare	Insignificant	Low
Universities	Rare	Insignificant	Low
Peak Industry Bodies (PIBs)	Rare	Insignificant	Low
Private sector research agencies	Rare	Insignificant	Low
Other RDCs	Rare	Insignificant	Low
Media agencies	Rare	Insignificant	Low
Commercial partners - Hort Innovation Venture Fund	Rare	Insignificant	Low
Commercial partners - domestic	Rare	Insignificant	Low
Future commercial partners - international	Unlikely	Minor	Moderate

¹ Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (May 2023) page 40

Criterion 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.

As noted in previous Modern Slavery Statements, Hort Innovation has taken a number of actions to assess and address these risks, including:

- Formation of a Risk Management Committee to lead a more proactive approach to assess and address risks, including modern slavery risks.
- Standard contract templates to include modern slavery provisions.
- The optimisation of our procurement management system to streamline the process and
- Enhance usability for our staff and our delivery partners, which provides a more robust platform for managing third-party risk including modern slavery.
- Subscription to a commercial intelligence provider to enable improved due diligence of new business partners.
- Regular WHS committee meetings.

We have also maintained a number of avenues for confidential grievances via an independently managed hotline, in accordance with our Whistleblower Policy.

During the reporting period, the following steps were taken:

- Review of our Risk Appetite Statement to articulate the Board's low risk appetite for delivery partners being linked to modern slavery practices.
- Review of the Compliance Policy setting out the Board's expectations including for the Modern Slavery Act.
- Enhancement to the Compliance Management System to focus on 13 core compliance modules including modern slavery. This more clearly allocates accountabilities and responsibilities for compliance and is reported to the board by a letters of assurance process.

- Re-design of the supplier modern slavery questionnaire as part of the tender or pre-contracting stage.

This questionnaire now includes links to the Horticulture Showcase, a virtual hub of workplace information and resources provided by the Fair Work Ombudsman and to the reporting hotline managed by the Australian Federal Police.

Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions.

Hort Innovation evaluates the effectiveness of its modern slavery risk mitigation efforts through a risk-based approach embedded within its broader risk management framework.

This includes regular reviews of supplier risk ratings, monitoring of due diligence outcomes, and the integration of modern slavery assessments into procurement and investment processes.

We also track completion rates of the modern slavery questionnaire, escalate high-risk findings to senior leadership,

and report progress to the Audit and Risk Committee.

These mechanisms support continuous improvement and ensure that actions taken are proportionate, measurable, and aligned with our risk appetite and compliance obligations.

Criterion 6: Describe the process of consultation with any entities the reporting entity owns or controls.

Hort Innovation does not own or control any other entities and therefore this criterion is not applicable.

Criterion 7: Any other relevant information.

The following actions are planned in the current period:

- Better targeting of the existing modern slavery questionnaire by distributing it at the pre-contract stage, rather than the pre-tender stage which is currently the case. This will provide for a more detailed and relevant analysis of responses.

- Requiring all new staff members to complete an online modern slavery risk assessment module.

- Maintaining awareness of developments in the modern slavery regulatory and operational landscape.

Hort Innovation

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