



# Forced labour, modern slavery and human trafficking **statement.**



This Forced labour, modern slavery and human trafficking statement is made pursuant to the *Modern Slavery Act 2018* by Bidfood Australia limited (Bidfood) (ABN 33 000 228 231) in respect of Bidfood Australia and its related bodies corporate. This statement demonstrates our commitment to ethical trading, tackling modern slavery and the steps being taken to increase transparency within our supply chain and our own operations.

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# Introduction: company commitment and pledge.

Modern slavery is known by many names - forced labour, forced or servile marriage, debt bondage, forced sexual exploitation, human trafficking and the sale and exploitation of children. In all forms it involves the removal of a person's freedom, including their freedom to accept or refuse a job or to leave one employer for another.

It is widespread and recognised to be a growing issue, given the rapid rise in global migration. It exists in every region and every type of economy - industrialised, developing or in transition. No sector or

Bidfood Australia recognises that modern slavery is a crime that can take many forms and as a commercial organisation, we have a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms. We are committed to preventing slavery and human trafficking in our corporate activities, and to putting effective systems and controls in place to safeguard against any form of modern slavery within our business and supply chains. Ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

Bidfood is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery and human trafficking throughout its supply chains, consistent with its disclosure obligations under the *Modern Slavery Act 2018*.

**M**odern slavery is the umbrella term used to encompass the offences of slavery, servitude, forced or compulsory labour and human trafficking.

industry is untainted. Modern slavery thrives on vulnerable and unprotected workers, and is driven by discrimination, inequality, poverty and greed for financial gain.

According to the International Labour Organisation (ILO), on any given day in 2021 an estimated 27.6 million people were in a situation of forced labour, 3.3 million of these were children. The private sector accounts for 86% of forced labour spanning industries such as the service industry, manufacturing, construction, agriculture, fishing and domestic work. Modern slavery is an unquestionable and indefensible violation of an individual's basic human rights.



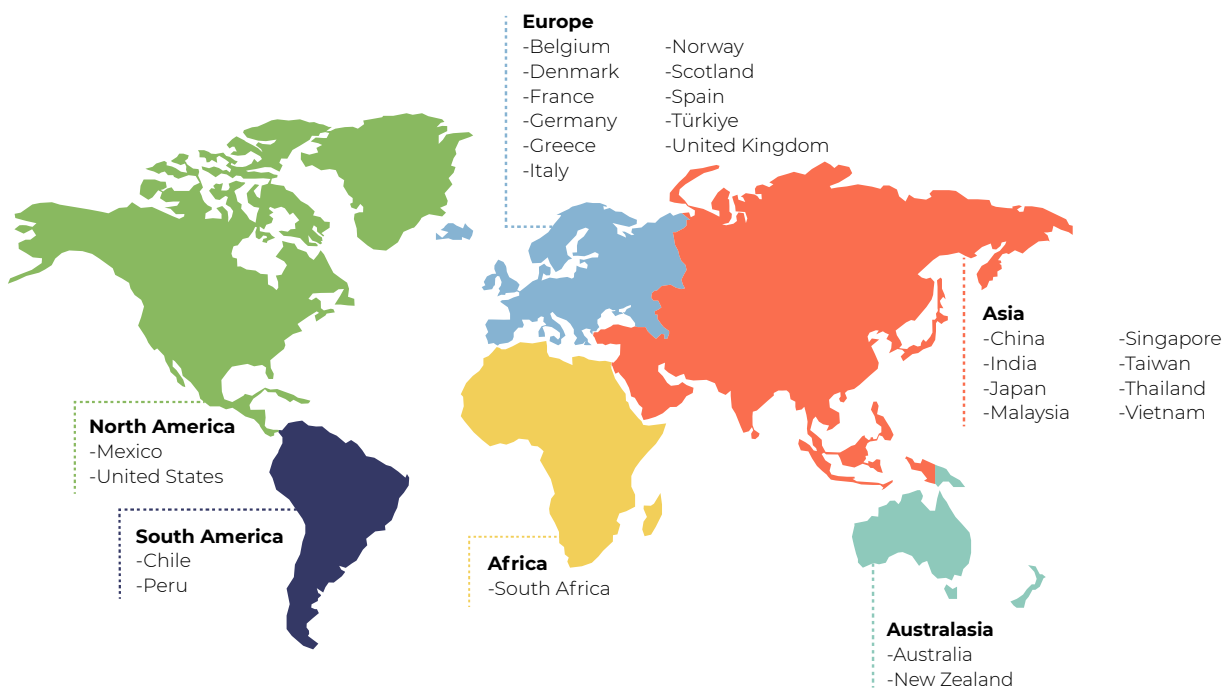
# Our business structure, operations and supply chains.

Bidfood Australia Limited is a subsidiary of Bidcorp Limited which is listed on the Johannesburg Stock Exchange. Bidcorp operates foodservice distribution businesses throughout Europe, South Africa, the Middle East, South East Asia, China, South America, as well as New Zealand and Australia.

Bidfood Australia Ltd has a nationwide presence in Australia employing over 2,500 workers via more than 30 wholly-owned subsidiaries, all of which share common directors. The business is managed by a board and an executive management group, all of whom are actively involved in the day to day business. The board and management of all entities in the group were consulted to reach the commitments towards the prevention of modern slavery outlined in this statement.

Bidfood Australia's corporate offices are located in Sydney, Melbourne, Brisbane and Adelaide, with over 50 food distribution and processing facilities operating across the country. Bidfood offers the most comprehensive range of food and food-related products to the Australian foodservice market, delivering from our warehouses direct to our customers predominantly with our own fleet of vehicles. Our processing facilities include cheese slicing and shredding plants, meat processing, sauce and dip manufacturing, dry product repackaging and a seafood crumbing and frying facility. Bidfood's strategy remains to create value by focusing on supplying the right product to the customer, at the right price and on time.

## OUR IMPORTS: COUNTRIES OF ORIGIN



# Our culture and values.

## Our code of conduct.

We are committed to conducting healthy business practices which support our company values of respect, honesty, integrity and accountability, ensuring a stable employment environment and the ongoing success of Bidfood.

We believe in empowering people, building relationships and improving lives. Entrepreneurship, incentivisation, decentralised management and communication are the foundation stones of success.

We subscribe to a philosophy of transparency, accountability, integrity, excellence and innovation in all our dealings.

## Our people.

The board recognises that the development of intellectual capital serves not only the economic interests of the group, but also the broader society within which Bidfood operates. It means ensuring not only that team members have skills to deliver on strategy, but also that statutory and social obligations in relation to challenges such as racial, gender and disability demographics are met.

Our employees work in entrepreneurial environments, where being the best and paying attention to detail are imperative.

Teamwork is critical and is reinforced at every level of the organisation.

We aim to:

- Empower our employees with the training, the authority and the responsibility to enable them to achieve their targets
- Enable employees to realise their potential through training and development of their skills
- Create a culture of non-discriminatory employment practices and the promotion of employees
- To create a safe and productive work environment

## Our corporate citizenship.

Bidfood operates throughout Australia and recognises that it is an integral part of the communities and environment in which it operates.

We aim to positively impact the communities and people we engage with - our employees, our customers, our suppliers. We strive to have a positive impact on anyone who comes into contact with us.

## Relevant policies.

We operate under the following policies that assist our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Modern Slavery Policy – all employees are instructed on this policy upon commencing employment. Local and foreign suppliers are required to agree to, and abide by, this policy
- Whistleblowing Policy – we encourage all our employees, ex-employees, suppliers and other stakeholders to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment and any other matter of a serious nature through our dedicated tip-off hotline
- Approved Supplier Program - we are committed to ensuring that our suppliers adhere to the highest standards of ethics. We require all our suppliers to agree to the principles of our policies and ensure that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour
- Sustainable Procurement Policy - we ensure our procurement practices are conducted in an environmentally friendly, sustainable and socially responsible manner
- Bidfood Code of Ethics – this sets out the core values which we expect to be observed throughout the company. This involves



maintaining the highest standards of integrity and conduct in all interactions with stakeholders and the broader society

- Anti-Fraud Policy – we are committed to zero tolerance for corrupt conduct, fraudulent activities or maladministration and operate with the highest possible standards of openness, transparency and accountability in our affairs. We promote a culture of honesty and opposition to fraud in all its forms

## Employee conduct and ethics.

We have strict HR policies and standards in place to ensure compliance with legislation and fundamental rights at work including; freedom of association, dignity at work and prevention of discrimination throughout employment. Prior to recruitment, we check the work eligibility of all our employees in Australia. Bidfood complies with all Australian employment legislation.

Our policies and standards are readily available to our employees through our intranet and notice boards. We operate a Preferred Supplier List (PSL) for the provision of agency labour and expect that agencies who provide workers to Bidfood adhere to the same strict standards. All of our PSL agencies undergo assessment prior to being added to our PSL to ensure their compliance with applicable laws and regulations.

We have in place a comprehensive code of conduct which includes fairness, non-discriminatory reporting, respect for human dignity and human rights, social justice, health and safety and ethics.

Our values are referenced frequently in internal communications, and are constantly reinforced in our team as part of our culture. If any employee's behaviour falls short of our expected code of conduct, we have a performance management approach that comprises everything from coaching and guidance right up to termination of employment. If any employee has a concern they feel they can't raise at work, they can contact our independent external 24-hour whistleblowing hotline.

## Code of conduct for suppliers.

We're committed to working with our suppliers to operate ethically and to build greater transparency within our supply chains. We aim to act dutifully and always within the law and regulations within Australia.

Our Sustainable Procurement Policy and Code of Conduct sets the guidelines by which we judge our suppliers. This includes ensuring labour rights and ethical treatment for their workers. As a minimum, we expect all suppliers to comply with national and international laws. This would include not only suppliers of our food and non-food products, but also suppliers of items and services which are used and/or consumed internally within Bidfood. All suppliers are expected to abide by our Supplier Code of Conduct.

Prior to trading, suppliers undergo an approval process and are expected to provide documented evidence of compliance with Bidfood's food safety and legality standards and, where applicable, their modern slavery statement. Furthermore, social standard certifications such as BSCI, SA8000 or a membership to ETI or SEDEX are preferred. Suppliers of our own brand products are subjected to further risk assessment and due diligence checks.

Where appropriate, and specifically for large expenditure items, Bidfood will conduct a tender process. Such tenders are conducted with transparency and openness as our core value.

Failure by a supplier to meet our standards may jeopardise their ability to continue to do business with us and are addressed on a case-by-case basis. If, following an in-depth investigation, the supplier still refuses to co-operate with Bidfood's due diligence process, we will cease trading with that supplier. If modern slavery or human trafficking is identified in our global supply chain, appropriate investigations will be conducted internally and the relevant authorities would be contacted.





# The risk of modern slavery on our business.

Bidfood Australia has investigated all areas where it may cause or contribute to modern slavery. It has assessed these risks into three broad categories.

- In our own operations throughout Australia:
  - Through our own labour and employment practices
  - Through the services we utilise such as cleaning, maintenance and labour hire
- In our supply chains:
  - Through the goods we purchase for resale (both domestically and from overseas)
  - Through the goods we use in everyday operations
- In our related parties throughout the world and their supply chains:
  - Through the related parties we indirectly own throughout the world
  - Through our sister companies around the globe

The food industry in which we operate unfortunately has many opportunities for exploitation in its supply chain, particularly around agriculture and fishery workers.

The 2023 Global Slavery Index compiled by the Walk Free Foundation identified the top five imported products at risk of modern slavery in Australia, these are:

- Electronics (laptops, computers and mobile phones)
- Fish
- Garments
- Solar Panels
- Textiles

We recognise that we must take action to mitigate the risk of modern slavery in these areas.

This does not take away from the rest of our product supply chain and service providers, these too have areas where there could be exploitation or modern slavery practices.

Geographically, there are several territories and countries which are part of the greater Bidfood group, as well as part of our supply chain, which are considered to have high modern slavery risks.

We also recognise that circumstances brought about by global struggles, such as natural disasters, pandemics and military conflicts, can lead to exploitative practices. When people become desperate for survival, they become open to being exploited in the worst possible ways.



# Due diligence processes.

## Current activity.

We recognise that addressing the problem of modern slavery is a continuous journey. The business has developed a road map for due diligence to help navigate the risks associated with modern slavery. This process will ensure that we are abreast of ever-changing risks and we have the correct processes in place.

This due diligence includes:

- Ensuring our HR department fully understand the employment laws and working conditions where we operate and make sure all members of management remain aware of these
- Getting insight into the origin of our products, including understanding our supplier's response to modern slavery
- Analysing our supply chain to identify and assess product-specific or geographic risks of modern slavery and human trafficking
- Evaluating modern slavery and human trafficking risks within our supply chain through the completion of our approved supplier questionnaires and our supplier declarations
- Regular reviews and assessment of our suppliers and their practices

In addition to the above, Bidfood provides safe and fair working conditions for all its employees and ensures that no child labour is employed, in line with minimum age laws, within areas that it operates. Bidfood expects the same standards from all of its contractors, suppliers and other business partners. Our contracting processes includes specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same standards.

## In our business.

An annual business risk assessment by the risk and audit committee evaluates all internal and external risks Bidfood might face, and assigns priorities based on the relevant business department. Tackling modern slavery remains a priority for us. We continue to look for ways to strengthen our understanding of modern slavery and potential exposure points in our business. Through better understanding, we find ways to improve our monitoring of modern slavery risks and implement effective controls to mitigate them.

## In our supply chain.

As well as compliance and adherence to the *Modern Slavery Act*, our key priority continues to be collaborating with our supply chain to reduce and ultimately remove modern slavery from all aspects of business. We have reviewed our processes for mitigating this risk and have identified improvements to engage with our suppliers in a more proactive manner.

We have divided our supply chain into three tiers:

- Tier 1 includes manufacturing sites supplying product directly to us
- Tier 2 includes manufacturing sites supplying via their distributors to us (external sites under agents and brokers)
- Tier 3 includes our service providers or providers of capital goods

This has allowed us to identify the countries our supply chain extends to and comprehend the complexity of it.

Although over 90% of our goods are sourced from within Australia, we still recognise the importance of monitoring our global supply chain.





We have been members of the Supplier Ethical Data Exchange (SEDEX) since 2019. We continue to identify tier one and two members of our supply chain that are already members of this platform.

This illustrates to us their commitment to ethical trading and together we can work to address the risk of modern slavery more effectively and improve our responsible sourcing practices.

We encourage those suppliers who are not members of SEDEX to join and discover how we can work together to combat modern slavery.

In the past year we:

- Reviewed and updated our slavery policy to ensure it reflects current areas of concern
- Assessed and refreshed our whistle blower policy to specifically include modern slavery practices as a reportable conduct
- Developed our sustainable procurement policy detailing the need to assess our suppliers against the treatment of their workers
- Provided training for key members of our procurement team to ensure they understand and are alert to the main indicators of modern slavery
- Had one of our processing facilities undertake a four-pillar SMETA audit

We continue to have a focus on the five high risk imported products identified by the Walk Free Foundation, as detailed above.

As a significant importer of seafood, we recognise the fishing industry as a significant area of potential exploitation. This year we continued to focus on our international seafood suppliers to ensure that they comply with our expectations around forced labour and exploitation.

Currently, over 80% of our imported seafood comes from suppliers that have been certified as sustainable, ethical and conducting responsible business practices. Where we are unable to gain assurances about the practices of our seafood suppliers, we are actively pursuing alternative sources including sourcing from lower risk countries.

In our business, as in life, the use of electronic goods is part of our everyday practices. To ensure we minimise the risk of supporting unethical practices, we only source our electronics from tier one reputable suppliers, all of whom have published their own modern slavery statements in accordance with the *Modern Slavery Act*.

As part of our ongoing efforts to reduce the environmental impact of our business, we have been installing solar power facilities at several of our sites. We recognise this is an area of high risk for modern slavery practices. We continue to work proactively with our solar panel suppliers to ensure that these are only sourced from reputable facilities.

When choosing a supplier to provide the clothing and uniforms our team wear, we made a conscious decision to work with a large reputable organisation that ensures their supply chain meets the same ethical standards that we hold ourselves to.



# Monitoring and remedial action.

## Within our business.

When there is something wrong in a business, the workers on the front line are usually the first to notice. Our whistleblowing policy aims to encourage and enable our team members to raise serious concerns within Bidfood through appropriate channels, rather than overlooking a problem. Bidfood prides itself on an attitude of “if you see something, say something.”

The contact details for our independently managed 24-hour whistleblowing hotline are prominently displayed at all our sites, so that anyone (employee, visitor or agency worker) can reach out if they suspect malpractice, without fear of retribution or retaliation. Contact can be made by telephone, email or logging an issue via the website, all in multiple languages.

We operate a corporate risk committee, which includes members of our Board of Directors and entails a review of all risks associated with the business on a quarterly basis, as well as the updating of actions to mitigate those risks. We recognise modern slavery and exploitation within our operations as a risk and it is included in our risk register, and we continue to review our practices and how we can minimise the likelihood of exploitation in all aspects of our business.

We are proud of the diverse background of our workforce, with nearly 20% of our people being migrant workers. This diversity helps expand the knowledge base of our team, which further helps identify possible exploitative practices. Through our centralised HR function, we have identified workers from countries where exploitative practices may be used against our migrant workforce to impact their welfare. As part of our monitoring of migrant workers, we ensure they have an appropriate visa, which we independently verify with the Australian government. Additionally, we review address and payment details to identify potential exploitative practices, such as preventing the worker from accessing their own funds.

## Within our supply chains.

We continue to focus on our supply chain, following on from risk assessments we have made based on geography and product. Knowing that the fishing industry is an area of potential exploitation, our national seafood procurement team regularly travel to the factories and facilities of actual or potential seafood suppliers to review their practices and ensure they comply with our standards.

As we continue the process of linking with our suppliers through the SEDEX platform, we internally review the information collected and identify the most effective way to use this for future risk assessments. We further evaluate any suppliers identified as being high risk as a result of the risk assessment.

Any suppliers that are implicated in the media or in any other way as being associated with modern slavery issues, will be subject to a full investigation to address any potential issues.

Where we identify suppliers of concern, we have frank discussions to give them the opportunity to rectify the situation. If we are not satisfied with the actions taken, we investigate alternate supply options and, where possible, look to a new supplier more aligned with Bidfood's standards.



# Training, consultation, raising awareness and capacity building.

Training on our policy and on the risk our business faces from modern slavery in its supply chain forms part of our company induction which all employees undertake and is reinforced as required (and as otherwise necessary).

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.



# Plans going forward.

## Within our business.

A review of our current processes and procedures has led us to assess the risk level of modern slavery and exploitation within our operations to be low, but this doesn't mean that we should ever be complacent given that the food industry as a whole is identified as being high risk.

Our future plans to further mitigate the risk of trafficking, exploitation and slavery include the following:

- We continue to work on further developing our supplier reporting and monitoring programs to enable potential risks to be identified more quickly
- We continue to update and improve our employee onboarding processes, giving us the opportunity to close any remaining gaps related to the protection of our workers. This will give our HR team more time to focus on any potential areas of concern
- We will look to develop training programs to help all of our team identify signs of modern slavery or exploitation

## Within our supply chains.

This coming year there will be a focus on expanding our supplier portal and reporting to enable us to risk assess and rank our tier one and two suppliers based on multiple elements of their social responsibility. We will work on gathering information from our suppliers at the individual product level so we can identify the true source of the product and assess risks deeper in our supply chains.

We will continue to promote SEDEX membership within our supply chain and work with those suppliers to measure and monitor their ethical practices.

We will engage with our international sister companies to ensure we all work together to create a global strategy to address the risks of modern slavery and exploitation.

To date, no modern slavery has been identified in our internal operations nor are we aware from our audit and verification processes of any in our supply chains. We will continue to monitor the effectiveness of our existing controls internally and review annually what improvements may be made to strengthen our auditing and verification procedures.





This statement has been reviewed and approved by the board of Bidfood Australia in their capacity as principal governing body of Bidfood Australia Ltd and its subsidiaries and will be reviewed annually. It is signed by Rachel Ruggiero in her role as Director and Chief Executive Officer of Bidfood Australia Ltd.

RACHEL RUGGIERO  
CEO Bidfood Australia Limited

Dated: 8 December 2024

