



Premier
FRESH AUSTRALIA

**Modern
Slavery
Statement**

Introduction

PREMIER Fresh Australia (PREMIER) is committed to the practice of good corporate governance and adhering to the highest ethical standards, complying with the applicable legal obligations including and without limitation, the Modern Slavery Act 2018 (Aust) (the Act).

We will not tolerate any forms of coercion, deception, threat, or worker exploitation that undermine the individual and collective freedom of the workforce within our business and supply chain.

PREMIER has prepared a Modern Slavery Statement for the reporting period, financial year ending 30 June 2023, and submitted within 6 months after the end of the reporting period, in accordance with sections 14 and 16 of the Act. This Statement is for the purpose of outlining our commitment and the approach taken to ensure we are taking reasonable steps to demonstrate further maturing of operating standards and processes to minimise the risk of modern slavery in our business operations and supply chain.



Reporting Entity

PREMIER is a privately owned enterprise, established from the 2016 merger of the LaManna Group and PREMIER Fruits Group. All shareholders remain in the business, with Market Gardeners Ltd in New Zealand being the major shareholder. The head office location is 103-107 Hyde St, Footscray, Victoria 3011 Australia.

PREMIER's Modern Slavery Statement is applicable to the PREMIER Fresh Australia (ABN: 87 004 843 556) and its wholly owned subsidiaries.

This statement was reviewed by the board of PREMIER Fresh Australia as the principal governing body and was approved on 23rd November 2023.



About Us

PREMIER is one of Australia's largest, and privately owned fresh produce supply chain companies, providing both its domestic and overseas customers with a single source of supply across a diverse range of fruit and vegetable categories.

PREMIER has a vertically integrated production capacity across growing, marketing and supply, together with an unrivalled partner grower network which spans all Australian states and includes open field growing as well as protected cropping.

Our farming and distribution operations, coupled with major supermarket and independent retailer relationships, ensure we reach Australian households with good quality, healthy, fresh produce.

PREMIER's sales and distribution operations include climate-controlled distribution services, packing and advanced ripening facilities, and central market Trading operations in every State and Territory of Australia, excluding Tasmania and the ACT.

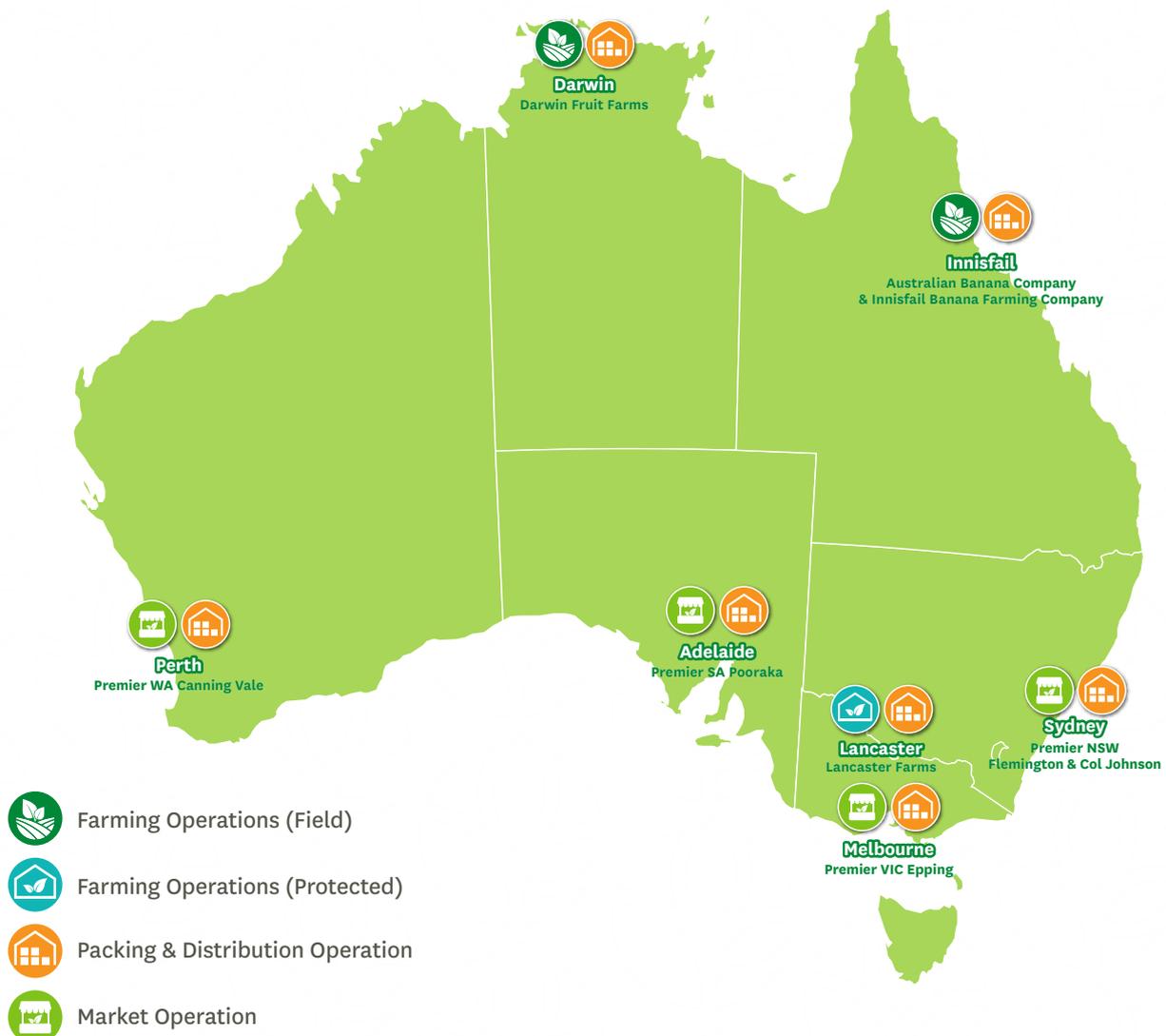


Employees

PREMIER employ over 500 people directly and through third party labour hire providers across our national group of horticultural farming operations and wholesale distribution of fresh produce. In addition, we also source product from our partner growers, who provide employment for up to several thousand people.

PREMIER's workforce encounters fluctuations primarily driven by the seasonality of production. During peak harvest seasons, the demand for labour is significantly higher, contributing to a higher workforce total.

PREMIER's direct workforce is covered by an applicable Modern Award, or salaried agreement. Our internal Payroll & Compliance department, have a systematic verification and audit program to ensure ongoing compliance to National Employment Standards (NES) and Modern Award conditions. PREMIER have terms of agreement with all labour hire providers, stipulating the applicable Modern Award workers must be covered under.



Understanding our Supply Chain Risks

PREMIER's supply chain includes the production, sourcing, and distribution of fresh produce from farm to major and independent retailers nationwide and international export of Australian fresh produce via freight forwarding.

Our major suppliers of products and services are almost all Australian, with less than 5% being international supply chains.

PREMIER recognises that due to the to the number of stakeholders operating across our supply chain, that there is potential for modern slavery to occur. Common modern slavery risks identified within our operational and sourcing footprint, include;

- Forced or bonded labour
- Unethical recruitment
- Underpayment of wages
- Excessive working hours
- Unsafe working environment



Partner Growers and Suppliers

PREMIER sources produce from partner growers spanning all Australian states, in turn causing a higher risk of modern slavery. We have an established Approved Supplier Policy and Program (QTPP0001 Approved Supplier Policy) which requires suppliers to acknowledge compliance with PREMIER's ethical sourcing practices. The program includes support mechanisms and tools in which we provide our grower partners to ensure they meet ethical standards and improve in identified areas of risk. The plan has been updated to include specific reference to Modern Slavery requirements and is being distributed to new and all existing suppliers. PREMIER has a zero tolerance for all forms of Modern Slavery, this is communicated to all Approved Suppliers and is continuing to develop to incorporate all suppliers, contractors, and business partners.

Transportation - road, air, and sea freight

PREMIER utilises a wide range of transportation for product both domestically, interstate, intrastate and internationally. All transportation service providers have received communication regarding the PREMIER Modern Slavery Policy and Statement, outlining the expectations required of all businesses in this regard.

Packaging

PREMIER engages with several packaging manufacturers and suppliers to ensure product meets customer expectations and requirements. All Packaging manufacturers and suppliers have received communication regarding the PREMIER Modern Slavery & Ethical Sourcing Policy (CGPP0002 Modern Slavery & Ethical Sourcing policy) and Modern Slavery Statement (CGPP0001_Modern Slavery Statement), outlining the expectations required of all businesses in this regard.

Labour Hire & other third-party services

PREMIER has an established an Approved Labour Hire Program and utilises 12 preferred labour hire providers to place temporary and seasonal workers. In addition, PREMIER utilises several other services including maintenance, safety provision, cleaning, and security.



Risk Assessment and Mitigation

PREMIER is committed to and takes a proactive approach to preventing Modern Slavery Risk from our supply chain. PREMIER's management of Modern Slavery risk, in our operation and supply chain, is guided by our CGPP0002 Modern Slavery & Ethical Sourcing policy as endorsed by the PREMIER Board in May 2022.

Our risk-based due diligence process, constructed with reference to our Ethical Sourcing and Modern Slavery Policy, is part of our broader Approved Supplier Program and is designed to identify and assess a range of potential risks in the supply chain, including Modern Slavery.

PREMIER encourages an open and honest approach in setting out the actions we have completed and when considering the effectiveness of our efforts. During this reporting period, PREMIER has continued to advance our controls and processes to assess and address modern slavery related risks within our operations and supply chain.



We have developed and implemented an action plan with appropriate measures to prevent, mitigate, address, or remediate modern slavery related risks. The purpose of our action plan is to set achievable standards and to encourage suppliers to identify areas of risk and concern, while also committing to continuous improvement. The key areas of focus are set out here.



Our progress against our 2023 targets is outlined in table below.

Target	Outcome
100% of HPA agreements reviewed	The review process is ongoing and will form part of the PREMIER targets for the 2024 reporting period.
Implementation of Learning Management System	The successful implementation of a Learning Management System, ‘EdApp by Safety Culture’. The development of a Modern Slavery training module did not proceed, however additional consultation methods continued to address and educate the workforce on modern slavery risks.
Build on current systems and processes to effectively measure our actions	<ul style="list-style-type: none"> • SEDEX Membership updated to AB Member, allowing greater visibility of ethical compliance and activity of both buyers and suppliers. • Fair Farms Membership. • Engaging selected farming operations to undertake Fair Farms accreditation.
Continue to work with supply partners that are registered with SEDEX or Fair Farms	<ul style="list-style-type: none"> • 55% of partner growers registered on SEDEX or Fair Farms. • 80 partners growers/third party providers completed social audit.

Approved Supplier Program

- 100% of PREMIER and controlled entities are Sedex members with a third party SMETA audit completed.
- 40 partner growers have undertaken ethical audits (SEDEX/Fair Farms) this year.
- Working with selected Suppliers within the Approved Supplier Program to audit their business practices to strengthen their internal policies and procedures; including, but not limited to, workers’ labour and payroll conditions.
- Provision of support mechanisms and tools to enhance suppliers improvement in areas of non-conformance, to ensure 100% to ethical standards.
- The ongoing and enhanced review and update of approved supplier agreements to include a Modern Slavery clause, followed by distribution of the revised approved supplier agreements.

We have assessed our top 100 supplier Modern Slavery positions. We examined their statutory reporting obligations concerning the Modern Slavery Act, in compliance with SEDEX auditing and the existence of internal policies relating to Human Rights and Ethical Sourcing. The annual review process with our Tier 1 and 2 (direct and indirect) suppliers now has a requirement to include discussions relating to Modern Slavery, ensuring Modern Slavery Risks are front of mind for PREMIER and our partners. (Refer to Third Party Supplier Auditing, Page 3).

Labour Hire Providers

Internal audits of our third-party labour suppliers are conducted on a regular basis. This includes auditing compliance against PREMIER's Labour Hire Service Agreement and all relevant state and federal legislation. Labour Hire Service Agreements make explicit PREMIER's expectations with respect to the conduct and legal compliance of such suppliers, including explicit reference to PREMIER's Ethical Sourcing and Modern Slavery Policy.

As part of our commitment to continuously addressing and reducing modern slavery risks in our own operations and that of our suppliers, PREMIER will periodically review and further develop our internal control and risk management systems to ensure we properly monitor and where identified address and remediate any modern slavery risks or activity.

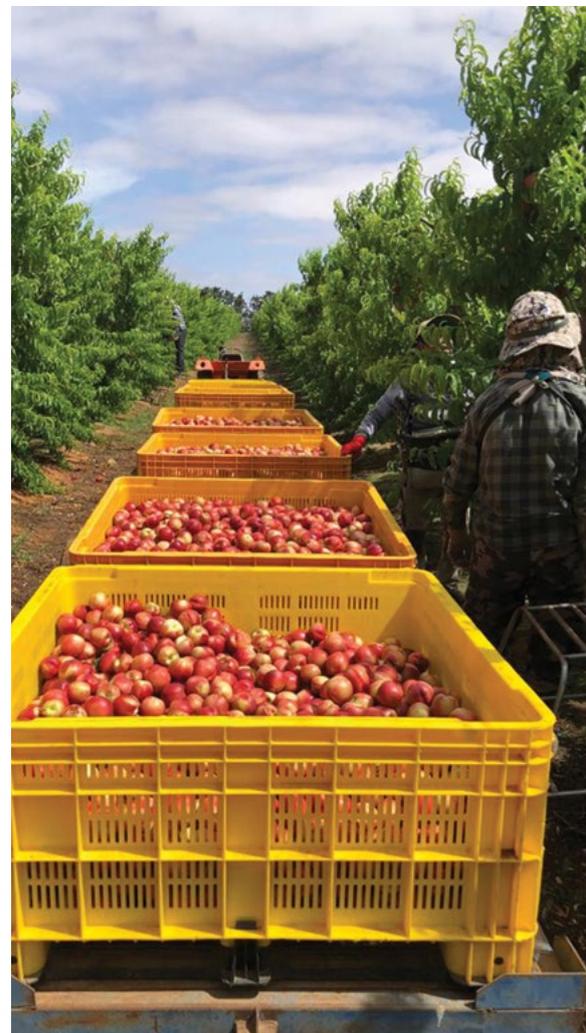
Pacific Island Workforce

PREMIER source labour through the Pacific Australia Labour Mobility Scheme (PALM) to meet our labour demands on farm.

The PALM scheme has become an integral part of our labour strategy. PREMIER's wholly owned Darwin Fruit Farms (DFF) is an approved employer under the scheme, ensuring a continued reliable workforce. In the 2023 reporting period, there were 28 direct placements of Seasonal Workers at our DFF operations.

Under the new PALM scheme guidelines implemented at the end of the 2023 reporting year, DFF has been classified as a 'low risk' approved employer, determined by the Department of Foreign Affairs and Trade at the completion of the 'Declaration and Statement of Compliance' assessment.

PREMIER continue to use Labour Hire Providers to supply the Seasonal Worker workforce across our wholly owned farms in Far North Queensland. The use of Labour Hire Providers increases the risk of modern slavery violations, however, continues to provide a consistent workforce throughout the year. To mitigate the risk of unethical practices, these providers participate in the labour hire audit program conducted by PREMIER.



Policy Framework

PREMIER's policies, procedures and programs listed below reflect PREMIER's values, standards, expectations, and commitment to compliance with Modern Slavery from our own team and our suppliers and are based on national and internationally recognised codes of practice, including Ethical Trade Initiative (ETI) Base Code and the Universal Declaration of Human Rights.

In addition to the company policies, PREMIER has a range of initiatives that deliver the requirements of the policies and aim to inform, guide, and support the workforce. These include:

- CGPP0003 Anti Bribery & Corruption Policy
- CGPP0002 Modern Slavery & Ethical Sourcing Policy
- CGPP0004 Whistleblower Policy
- CGPP0008 Terms of Trade (Merchant)
- CGPP0006 Privacy Policy - External
- QTPP0005 Approved Supplier Policy
- HRPP0005 Equal Employment: Discrimination, Harassment and Bullying Policy
- HRPP0028 Workplace Grievance & Complaints Handling Policy
- HSWPP0001 Health, Safety & Wellbeing Policy
- HRPP0029 Wages & Employment Compliance Policy

Third Party Supplier Auditing

All major Australian retailers require all direct and indirect suppliers (Tier 1 and Tier 2) to be ethically responsible by meeting regulatory requirements with regards to employee and labour hire conditions and management. All PREMIER packing sites and Tier 2 supplier sites must be registered on either of the SEDEX (Supplier Ethical Data Exchange) or Fair Farms responsible sourcing schemes.

As a Tier 1 supplier, PREMIER is required to complete frequent SEDEX audits at all packing sites. PREMIER's Quality and Technical (QT) team provide support to Tier 2 suppliers to register and complete ethical requirements, and regularly report to major customers to ensure that PREMIER and our suppliers meet all requirements.



Employee Assistance Program

PREMIER engaged an Employee Assistance Program (EAP) service provider, MindFit, providing PREMIER's workforce an enhanced mental health support service. Access is available to all employees and eligible immediate family members with a range of services and support. It is a confidential and 24-hour service, with support available for personal and work-related issues including performance, dealing with grief, and stress management.

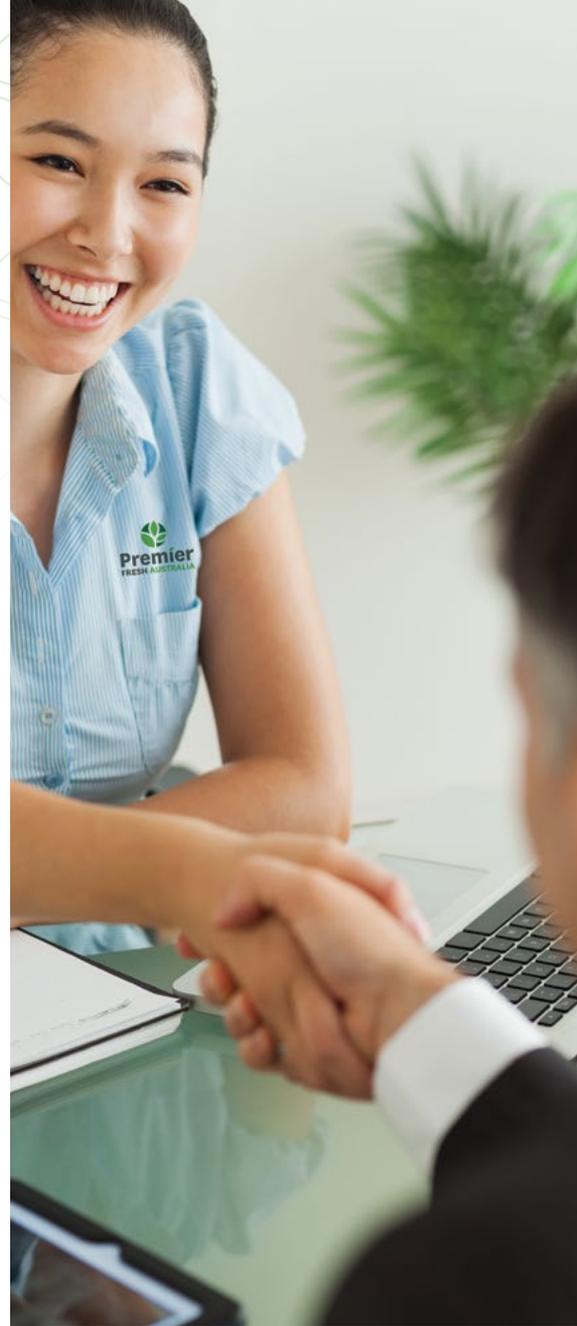
Human Resources Support & Contact Officers

PREMIER's Business Support Human Resources (HR) team is the first point of contact for all general HR queries and support, hrsupport@PREMIERfresh.com.au. The team regularly support and advise managers on a range of employee development, performance management, employee grievance, employee relations and safety and wellbeing matters. Working with the local Health, Safety & Wellbeing Committees, the HR team appoint and train contact officers, who are positioned to provide impartial, unbiased support to all employees and workers, as an alternative support to the management. The national cohort of Contact Officers completed their annual training in October 2021, and each team informed of the appointed Contact Officers at the site.

Wages and Employee Conditions Hotline

The PREMIER Payroll team reviews all wages arrangements as part of the annual Wages Compliance Reporting at the end of each financial year, to ensure compliance against minimum wage requirements across the company's various jurisdictions. These processes are outlined in PREMIER's HRPP0023 Wages Compliance Policy.

All PREMIER workers have access to a Wages and Employee Conditions Hotline displayed onsite and via the national payroll team. All enquiries are ticketed with documented confirmation that the query has been resolved and closed out.



Training and Consultation

PREMIER'S training & consultation framework is significant in ensuring our workforce acknowledge and understand modern slavery.

Learning Management System

In the 2023 reporting period PREMIER implemented a Learning Management System, EdApp by Safety Culture, to enhance our training & consultation capabilities to address key areas in Human Resources, Work Health and Safety (WHS), Corporate Governance and Quality.

The platform has a suite of modules including Equality Employment Opportunity; Sexual Harassment in the Workplace; Bullying & Harassment- appropriate workplace behaviour; Grievance reporting and WHS related content.

Work Group Meetings

Across our operations Work Group Meetings (WGM's) are a regular tool utilised to provide specific information to the workforce regarding several areas of compliance, including WHS and Modern Slavery. The WGM's are delivered by site managers or supervisors and are made readily available on the PREMIER intranet. Sites will keep record of the WGM's that are acknowledged and signed off by participating workers.

Other communication tools

PREMIER deliver site inductions and re-inductions, reiterating key information to new and existing workers including components of Moderns Slavery.



Monitoring and Reporting

Supplier Survey

As part of our national supply chain, all suppliers were asked to complete a questionnaire related to their management and prevention of modern slavery within their operations and supply relationships. PREMIER's National Quality and Technical team and Human Resources team assess all suppliers for modern slavery risk on the basis of key risk factors and questionnaire responses.

The supplier survey includes collection of the following information:

- Suppliers contact details.
- To what extent has Modern Slavery risk been addressed by the business?
- Do employees have written employment agreements?
- Are Labour Hire Providers utilised?
- Name and license number of Labour Hire Providers where applicable and utilised.
- The survey is in addition to any auditing currently conducted with Labour Hire Providers by the PREMIER Human Resources team.

In the 2023 reporting period we received over 200 survey responses and recorded appropriately for trending purposes. This will be an ongoing annual initiative.

Labour Hire Audits

Premier continues to use consistent labour hire providers nationally across all sites.

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to participate in an internal audit pre-engagement and annually post-engagement. During the reporting period, all providers were required to undertake an internal audit ensuring compliance with PREMIER's Labour Hire Service Agreement and with all state and federal legislation. Further investigations are undertaken should issues be discovered, followed by appropriate remediation. Service Agreements issued with labour hire providers include reference to PREMIER's expectations for such providers, including reference to Ethical Trade and Modern Slavery.

SEDEX Membership

In the 2023 reporting period, PREMIER became AB members of SEDEX, allowing us to have greater visibility of compliance across customers and suppliers. This also allowed for a heightened level of risk assessment across the supply base, considering answers to the self-assessment questionnaire and non-conformances raised during audits.

Site visits

As part of our Approved Supplier Program, PREMIER conducts site visits of preferred partner growers which allows greater transparency and visibility of conduct occurring on site. It allows further identification and assessment of areas that may be overlooked through desktop audits.

Measuring effectiveness

PREMIER has completed an assessment of modern slavery risk as part of PREMIER's Approved Supplier Program, and we will continue with this approach to expand our level of understanding of the nature of risks pertaining to modern slavery within our operations and across our supply chain.

As part of PREMIER's usual continuous improvement process and for compliance with the Modern Slavery Act 2018 (Aust), the scope of PREMIER's current internal controls and risk management systems will extend to profile the risk and management of our supply chain partners as it relates to modern slavery risk, and to deliver greater oversight of the effectiveness of PREMIER's risk management systems.

Effectiveness of the initiatives outlined in this statement is monitored regularly and assessed through the following processes.

Review of Policies and Procedures

PREMIER have a schedule of review for all Corporate Governance, HR and WHS policies, outlining the required frequency of review. In addition, policies are monitored throughout the year, to ensure they're reviewed upon legislation requirements or updates.

Risk Assessment

- Internal audits
- Third-Party audits

Grievance Procedures

- Disclosure Coordinator
- Grievance Procedure
- HR Support hotline

Monitoring

- Supplier/Grower site visits
- Program of training and consultation



Continuous improvement

We have developed and implemented an action plan with appropriate measures to prevent, mitigate, address, or remediate modern slavery related risks. The purpose of our action plan is to set achievable standards and to encourage suppliers to identify areas of risk and concern, while also committing to continuous improvement.

As part of our ongoing review of our action plan, our priorities for the 2024 reporting period include;

- a. Advanced and General Modern Slavery Awareness modules made available in the Learning Management System.
- b. All PREMIER supervisors and managers to complete Modern Slavery Advanced Awareness training available on the Learning Management System.
- c. General Modern Slavery Awareness training module made available to entire PREMIER workforce and supply partners to complete.
- d. Continue to conduct audits on partner grower and suppliers.
- e. Complete a review of all HPA agreements to include Modern Slavery provisions.
- f. Continue to work with supply partners that are registered with SEDEX or Fair Farms.
- g. Build on current systems and processes to effectively measure our actions.

Consultation and Approval

PREMIER's Board and Audit and Risk Committee retain oversight of PREMIER's Ethical Sourcing and Modern Slavery Policy and mandate that all stakeholders throughout the Group understand and maintain awareness of the Policy, accessed on PREMIER's Intranet and shared file storage system, and communicated through the annual training program as implemented by PREMIER's Human Resources team.

This statement was approved by the board of PREMIER Fresh Australia and on 23rd November 2023.



Anthony Di Pietro
Group Chief Executive Officer
23rd November 2023