

SINCE 1978

*Perfection*  
**FRESH®**



**2023/2024**

*Modern Slavery*  
**STATEMENT**







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# INTRODUCTION

**“MODERN SLAVERY HAS NO PLACE IN OUR OPERATIONS. WE ARE COMMITTED TO TRANSPARENCY, ACTION, AND BUILDING A FUTURE WHERE EVERY WORKER IS PROTECTED AND RESPECTED.”**

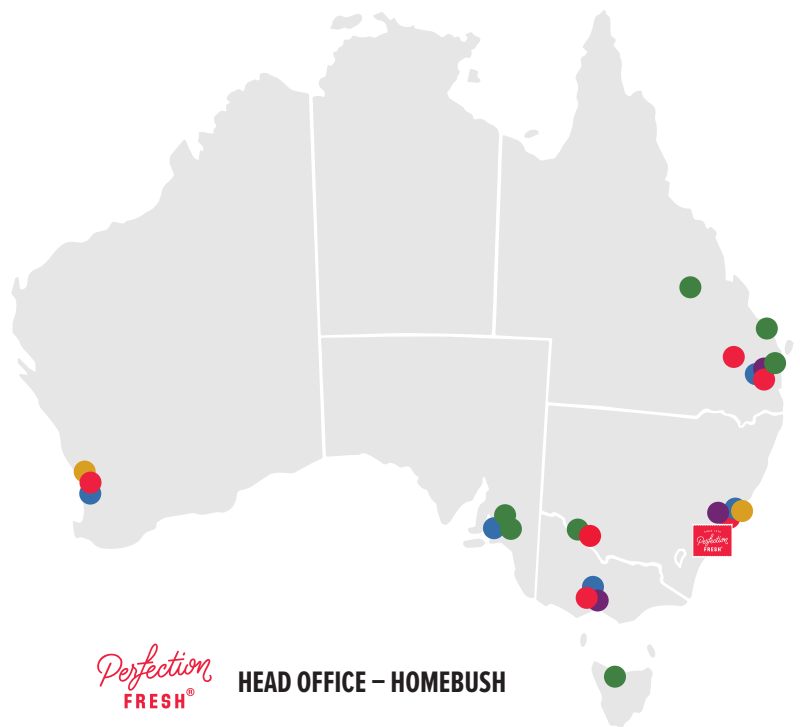
At Perfection Fresh, our commitment to upholding and advancing human rights is deeply embedded in our culture and operations. Guided by our PRIDE values—**Passion, Respect, Innovation, Discipline, and Ethics**—we strive to create a workplace and supply chain that prioritises the dignity, safety, and fair treatment of every individual.

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* and outlines the steps taken by Perfection Fresh Group (Perfection Fresh) and the companies listed in Appendix A from 1 July 2023 to 30 June 2024 to address and mitigate modern slavery risks in our operations and supply chains.

During this period, we have focused on enhancing due diligence processes, supporting vulnerable workers, and fostering responsible partnerships with our labour hire providers and suppliers. We remain committed to continuous improvement in ethical sourcing and human rights protections across all facets of our business, driven by our passion for reducing the risk of exploitation and harm to workers throughout our operations and supply network.

With respect at the heart of our interactions, we have continued to empower our workforce through programs such as the Welfare Officer initiative, increased engagement with PALM scheme workers, and the expansion of accessible grievance mechanisms. We are determined to lead by example—innovating our practices, strengthening our systems, and embedding ethical standards that reflect our responsibility as a leading Australian fresh produce company.

**Modern slavery is an unacceptable reality, and we acknowledge our role in contributing to its eradication. We remain committed to continuous improvement, transparency, and collaboration as we work to ensure our operations are free from exploitation and aligned with the values we proudly uphold.**



*Perfection*  
**FRESH®**

**HEAD OFFICE – HOMEBUSH**

## **FARMS**

- Perfection Bundaberg
- Perfection Berries Caboolture
- Perfection Two Wells
- Como Wood Supply
- Perfection Berries Riana
- Perfection Grapes Sunraysia
- Perfection Grapes Emerald

## **TREATMENT FACILITY**

- VHT Brisbane
- Ripening Sydney
- Ripening Melbourne

## **WHOLESALE MARKET FLOOR**

- Brisbane
- Sydney
- Melbourne
- Perth
- Adelaide

## **DISTRIBUTION CENTRES/ REGIONAL OFFICES**

- Brisbane
- Rocklea
- Sydney
- Melbourne
- Perth
- Gatton
- Werribee
- Robinvale

## **VALUE ADD FACILITY**

- Sydney
- Perth

# STRUCTURE, OPERATIONS, *and supply chains*

PERFECTION FRESH IS A LEADING GROWER, MARKETER, AND DISTRIBUTOR OF FRESH PRODUCE ACROSS AUSTRALIA. OUR OPERATIONS SPAN FARMING, PACKING, DISTRIBUTION, AND SUPPLY TO MAJOR RETAILERS, FOOD SERVICE PROVIDERS, AND INTERNATIONAL MARKETS.

## OPERATIONS

We manage multiple farming sites, glasshouses, packing facilities, wholesale markets, and value-added processing centres across Australia.

## SUPPLY CHAIN

Our supply network includes direct farming operations, contracted growers, and labour hire providers. We engage with more than 300 growers and suppliers, ensuring they align with our ethical sourcing policies.

## LABOUR FORCE

Perfection Fresh engages direct employees, as well as temporary and seasonal workers through labour hire arrangements, with a strong commitment to maintaining fair and ethical working conditions.





# MODERN SLAVERY RISKS IN OUR OPERATIONS

*and supply chains*

**WE RECOGNISE THAT MODERN SLAVERY RISKS CAN EMERGE IN VARIOUS PARTS OF OUR OPERATIONS AND SUPPLY CHAINS, PARTICULARLY IN:**

- **Labour hire and seasonal workforce:**  
The use of temporary and seasonal labour presents risks related to recruitment fees, underpayment, and poor working conditions.
- **Third-party suppliers and growers:**  
The reliance on external growers and suppliers requires continuous monitoring to prevent labour exploitation.
- **International supply chain partners:**  
Imported goods and raw materials may pose modern slavery risks due to varying labour regulations and enforcement standards.
- **Contractors on Perfection Fresh sites:**  
All contractors permanently located on our sites are included in our due diligence process to ensure they comply with ethical labour standards.



## ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Perfection Fresh has implemented a robust due diligence and remediation framework to address modern slavery risks. Key actions include:

- **Enhanced labour hire oversight:**  
100% of labour hire providers engaged on our farms have undergone third-party ethical audits, complemented by regular internal audits to ensure ongoing compliance with ethical labour standards and continuous improvement in workforce management.
- **Supplier due diligence:**  
All new direct and indirect suppliers must adhere to the *Fair Work Act* (2009), the Ethical Trading Initiative (ETI) Base Code, International Labour Organization (ILO) standards, and the UN Guiding Principles on Business and Human Rights. Additionally, compliance with the Horticultural Code of Conduct is required to ensure fair and lawful business practices. As part of our commitment to ethical sourcing, suppliers must complete rigorous assessments to verify their alignment with these standards, ensuring responsible labour practices and continuous adherence to human rights and workplace protections.
- **Risk-based audit program and remediation framework:**  
Over 90% of high-risk suppliers have undergone third-party audits, with corrective action plans enforced where necessary and remediation measures implemented to address identified issues. Our structured remediation framework ensures that non-compliances are addressed through targeted actions such as compensation, policy updates, and worker support programs. Regular internal audits and follow-up third-party assessments verify the effectiveness of these measures, ensuring continuous improvement, sustained compliance, and a long-term commitment to ethical sourcing.
- **Whistleblower protections:**  
We have launched an independent whistleblower hotline to ensure workers can report issues without fear of retaliation.

## RISK ASSESSMENTS UNDERTAKEN

Perfection Fresh undertakes rigorous risk assessments across its supply chain to identify and mitigate modern slavery risks. Our approach includes:

- **Supplier risk profiling:**  
Evaluating suppliers based on country risk, industry sector, and historical compliance performance.
- **Labour hire risk reviews:**  
Ensuring that all labour hire providers meet strict ethical and legislative compliance requirements.
- **Internal site audits:**  
Conducting internal assessments of Perfection Fresh-owned and leased sites to monitor working conditions and labour standards.
- **Third-party audits:**  
Engaging external auditors to conduct independent risk assessments, including SMETA and Fair Farms audits.
- **Comprehensive safeguards:**  
Rigorous pre-employment checks, along with thorough reviews of contracts and pay conditions, to prevent worker exploitation and ensure fair employment conditions.

All produce suppliers must complete the Approved Suppliers Questionnaire, have a Supplier Agreement in place, and receive formal approval before supplying produce to Perfection Fresh. This process ensures that all suppliers meet our ethical sourcing and modern slavery compliance standards.

## METHODOLOGIES AND TOOLS USED TO IDENTIFY RISKS

| Methodology/Tool                    | Purpose   |
|-------------------------------------|---|
| Approved Supplier Program           | Ensures all new and current suppliers comply with ACCC, Food Safety, Customer and Ethical sourcing supplier requirements              |
| Sedex-Radar Methodology             | Provides risk scores and compliance evaluations for suppliers.  |
| Fair Farms and SMETA Certifications | Certifies growers and suppliers against ETI Base Code, ILO Conventions, and Australian Employment and WH&S legislation                |
| Internal Due Diligence Program      | Evaluates and monitors labour hire providers and onsite permanent contractors to ensure ethical recruitment and employment practices. |

## *Audits undertaken in* **FY 2023/2024**

|   |              |
|---|--------------|
| <b>SMETA and Fair Farms social audits conducted</b> |              |
| • Suppliers   | <b>199</b>   |
| • Perfection Fresh group sites                      | <b>15</b>    |
| <b>Non-compliance cases verified and closed</b>     | <b>2,105</b> |
| <b>Number of Strategically Aligned Growers</b>      | <b>332</b>   |
| <b>SMETA members</b>                                | <b>290</b>   |
| <b>Fair Farms members</b>                           | <b>42</b>    |





# *Communicating our* **HUMAN RIGHTS EXPECTATIONS**

**PERFECTION FRESH IS COMMITTED TO ENSURING THAT ALL WORKERS WITHIN OUR OPERATIONS AND SUPPLY CHAIN UNDERSTAND THEIR RIGHTS AND HAVE ACCESS TO APPROPRIATE SUPPORT MECHANISMS. KEY ELEMENTS OF OUR HUMAN RIGHTS COMMUNICATION STRATEGY INCLUDE:**

- **Ethical Sourcing of Labour Policy:**  
All contractors and suppliers receive and acknowledge Perfection Fresh's Ethical Sourcing of Labour Policy to ensure ethical labour sourcing by upholding human rights, fair working conditions, and compliance with Federal and State regulations, ETI Base Code, ILO Conventions, and industry standards. The Policy sets clear expectations for employees, suppliers, and labour hire providers to prevent exploitation, promote worker welfare, and align with global ethical principles. Through audits, risk assessments, and continuous improvement, the policy safeguards fair employment practices and responsible sourcing across all operations.
- **Supplier Code of Conduct:**  
All suppliers receive and acknowledge Perfection Fresh's Supplier Code of Conduct, which outlines expectations regarding ethical labour practices, fair wages, and working conditions.
- **Induction and training programs:**  
All employees, local labour hire and seasonal workers receive training on workplace rights, grievance mechanisms, and ethical sourcing policies and standards (eg ETI Base Code).
- **Multi-language resources:**  
Key policies and worker rights information are translated into multiple languages to ensure accessibility for our diverse workforce.
- **Whistleblower and grievance mechanisms:**  
Workers are regularly informed about the availability of confidential reporting channels to raise concerns related to labour conditions or unethical practices.
- **Supplier engagement:**  
Regular supplier briefings and updates are conducted to reinforce compliance expectations, educate on legislative requirements and promote transparency within the supply chain.
- **Recruitment training:**  
Recruitment training is conducted to ensure compliance with legal and ethical standards, equipping our team with the knowledge to uphold fair and transparent hiring practices. This includes understanding employment laws, visa and work rights verification, award rates, and contract terms to prevent worker exploitation. Training also covers ethical recruitment principles, anti-discrimination laws, and obligations under modern slavery legislation. This training is continuous, as per legislative requirements regarding ethical standards in Australia.

*Moving forward*

# NEXT PHASE OF SUPPLY CHAIN DUE DILIGENCE FRAMEWORKS AND PROGRAMS FOR 2024/2025

PERFECTION FRESH IS COMMITTED TO STRENGTHENING ITS SUPPLY CHAIN DUE DILIGENCE AND EDUCATION INITIATIVES IN 2024/2025. KEY FOCUS AREAS INCLUDE:

- **Advanced supplier risk segmentation:**  
Implementing a tiered risk assessment model to prioritise higher-risk suppliers for more frequent (annual) audits and engagement.
- **Supplier capacity building:**  
Expanding training and resources to assist suppliers in meeting ethical sourcing requirements and modern slavery compliance expectations.
- **Technology-driven monitoring:**  
Enhancing our use of digital tracking and reporting tools to gain real-time insights into supply chain risks.
- **Expanded worker voice mechanisms:**  
Strengthening grievance mechanisms and worker surveys to ensure direct feedback from employees within our supply chain.
- **Continue to prioritise due diligence of Labour Hire Providers (LHPs) in our supply chain:**  
Utilise Sedex and Fair Farms to identify and verify LHPs, and continue to advocate on a national labour scheme.
- **Employee Assistance Program:**  
Providing a safe, confidential platform where workers feel comfortable and empowered to access timely and effective support for their social and psychological well-being with counselling and referral services that meets the needs of a diverse range of workers.
- **Continuous improvement reviews:**  
Conducting annual strategic reviews to refine our due diligence processes and ensure they align with emerging legal and ethical standards.
- **Ethics Training Program:**  
Designed for all team members to provide comprehensive guidance on ethical decision-making, workplace conduct, labour rights, and compliance with Federal, State and industry standards, including modern slavery laws and fair employment practices. Training covers key areas such as ethical sourcing, anti-discrimination, workplace safety, and responsible supplier engagement. By ensuring employees understand their ethical obligations and the impact of their actions, we promote a transparent, fair, and socially responsible working environment. Regular training sessions and updates help reinforce our commitment to ethical business practices and continuous improvement.





## PERFECTION FRESH SUPPLY CHAIN DUE DILIGENCE AND EDUCATION TARGETS TO BE ACHIEVED

| Description   | Targets   |
|---|---|
| % of growers/suppliers on Sedex/Fair Farms  | <ul style="list-style-type: none"> <li>100% of all Perfection Fresh direct and indirect suppliers identified as high-risk to complete annual third-party audits.</li> </ul>   |
| Advanced awareness training for category team and those managing higher risk categories | <ul style="list-style-type: none"> <li>Refresher training for key team members training on modern slavery and human rights.</li> <li>Conduct training across different business units on topics such as responsible purchasing practices, and develop content for an online team training module.</li> </ul>  |
| Supply Chain Awareness Training   | <ul style="list-style-type: none"> <li>Review grower manuals.</li> <li>Update the social quarterly supply chain communications.</li> <li>Refresh training to provide education and advice about workplace rights and protections under the <i>Fair Work Act 2009 (Cth)</i> and available Fair Work Ombudsman services to protect and empower vulnerable workers.</li> </ul> |
| General Awareness Training for all workers  | <ul style="list-style-type: none"> <li>Refresh training to provide education and advice about workplace rights and protections under the <i>Fair Work Act 2009 (Cth)</i>, ETI Base Code, and UNGPs.</li> </ul>  |
| SMETA/Fair Farms Audits – outcomes  | <ul style="list-style-type: none"> <li>Risk assessments to be undertaken on completion of social audits – 100%.</li> </ul>  |
| Whistleblower Hotline   | <ul style="list-style-type: none"> <li>Launch new online information, tools, and resources on modern slavery, translated into various foreign languages to all workers and site locations – 100%.</li> </ul>  |
| Employee Assistance/Support Program   | <ul style="list-style-type: none"> <li>Launch information for onsite easily accessible resources related to support programs in various languages – 100%.</li> </ul>  |





## ENGAGEMENT AND CONSULTATION WITH STAKEHOLDERS ACROSS THE GROUP

The creation of the Modern Slavery Statement for 2023/2024 was championed by our Ethical Sourcing team, with invaluable contributions from various departments and functions across the organisation. These included Human Resources, Farm Management, Sustainability, and the Produce Category teams. The collaborative efforts ensured that a comprehensive and informed approach was taken to address modern slavery risks across our operations.





# CONCLUSION

Perfection Fresh remains steadfast in its commitment to eliminating modern slavery from its operations and supply chains. Our approach is one of continuous improvement, underpinned by rigorous monitoring, worker support, and collaborative engagement with industry partners. By implementing the initiatives outlined for 2025, we aim to further strengthen our ethical sourcing practices and uphold the highest standards of human rights across our business.

**This Statement was approved by the Perfection Fresh Group Board on 30 May 2025.**



*Michael Simonetta*  
Chief Executive Officer

## Disclaimer

The purpose of the statement is to provide general information only as required by the *Modern Slavery Act 2018 (Cth)* and is correct as of the date of publication.



## *Appendix A*

# PERFECTION GROUP COMPANIES

- Agri Administration Services Pty Ltd ABN 70 603 544 021
- Choice Pack Pty Ltd ABN 78 127 390 425
- Como Glasshouse Investments Pty Ltd ABN 49 604 272 951
- Como Glasshouse No 2 Pty Ltd ABN 47 604 272 942
- Como Wood Supply ABN 70 603 344 396
- D'Vineripe Pty Ltd ABN 50 120 312 049
- Fresh Fruit For You No.2 Pty Ltd ACN 662 850 339
- Fruit Master Australia Pty Ltd ABN 77 614 029 953
- Fruit Master Farm Operations Pty Ltd ABN 52 612 363 676
- Fruit Master Holdings Pty Ltd ABN 92 614 065 655
- Fruit Master Perfection Pty Ltd ACN 614 036 574
- Glasshouse Group Holdings ACN 655 131 561
- Glasshouse Group Pty Ltd ACN 65 131 178
- Growco 3 Pty Ltd ACN 622 822 333
- GrowCo Holdings ABN 49 600 368 367
- Organic Foods of Australia Pty Ltd ABN 38 098 229 095
- Perfection Agri-Fresh ABN 59 149 811 156
- Perfection Barwon Pty Ltd ABN 49 622 822 324
- Perfection Berries Caboolture Pty Ltd ACN 608 700 474
- Perfection Berries Tasmania Pty Ltd ABN 47 622 822 315
- Perfection Fresh (Hong Kong) Ltd #70489248
- Perfection Fresh Agri-Fresh (Riverina) Pty Ltd ACN 140 000 862
- Perfection Fresh Australia Pty Ltd ABN 75 127 389 682
- Perfection Fresh Brisbane ABN 35 129 766 810
- Perfection Fresh Direct Pty Ltd ABN 50 128 743 895
- Perfection Fresh Exports Pty Ltd ABN 42 127 390 210
- Perfection Fresh International Pty Ltd ABN 55 613 632 901
- Perfection Fresh NZ Pty Ltd Company Number 1974 709
- Processing Holdings ACN 600 368 536
- Processing Holdings Pty Ltd ABN 89 600 368 536





## Appendix B

# MANDATORY CRITERIA

This Statement was prepared to meet the mandatory reporting criteria set out under the *Modern Slavery Act 2018 (Cth)*. The points below identify where each criterion of the Act is disclosed within sections of this Statement.

| Mandatory criteria  | Page number |
|---|-------------|
| Identify the reporting entity   | 4           |
| Describe the reporting entity's structure, operations and supply chains   | 5           |
| Describe how the reporting entity assesses the effectiveness of these actions   | 7           |
| Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls | 7           |
| Moving forward  | 10          |
| Targets to be achieved  | 11          |
| Engaging and consulting with entities across the Group  | 12          |





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