

Corval Group
150 Newlands Road,
Coburg North VIC 3058

Head Office/VIC Office
Phone: 03 9487 9500

CORVAL GROUP

Modern Slavery Statement 2022

01 Introduction

Corval Group Pty Ltd as Trustee for the Corval No.2 Trust, is a 100% Australian privately owned business and head entity of multiple businesses operating primarily in the food and beverage, and logistics industries. As a family business, people are our family and we take great pride in building genuine relationships that last a lifetime, be it with our suppliers, customers, partners or employees.

Whilst we consider that every part of our business has always been guided first and foremost by family values, integrity, and ethical principles, Corval Group acknowledges that there is always a risk that we may have unknowingly and unwillingly contributed to modern slavery through our supply chains.

'Modern Slavery' is a term used to describe a range of serious forms of exploitation or deceptive recruiting for labour or services where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception. These situations include slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour and the worst forms of child labour.

Modern Slavery is fundamentally unacceptable within our business and supply chains. We resolutely support the UN Guiding Principles on Business and Human Rights and actively accept the responsibility we have in eliminating any form of violation within our operations and those of our supply partners.

This year's Modern Slavery Statement aims to provide further insight into the risk of modern slavery in our operations and supply chain and the various actions we have taken to address modern slavery during the year 1 July 2021 to 30 June 2022.

02 Reporting Entity

Corval Group Pty Ltd, ATF Corval No.2 Trust, (ABN 63 341 137 300) ("Corval Group")

Reporting Period: 1 July 2021 to 30 June 2022

This Modern Slavery Statement is prepared and issued by Corval Group and is made pursuant to the *Modern Slavery Act 2018* (Cth) ("the Act") in respect of Corval Group and its owned and controlled entities as follows:

- The Trustee for THE CONGA TRUST (trading as Conga Foods Pty Ltd), (Conga Foods Pty Ltd) (ABN 96 327 180 764)
- Caffè Ducale Pty Ltd (trading as dc Specialty Coffee Roasters) (ABN 96 099 181 905)
- MaxFoods Pty Ltd (ABN 53 137 612 081)
- Pakval Pty Ltd (ABN 46 162 751 279)
- Gourmet Secrets Pty Ltd (ABN 82 160 227 832)

Corval Group's head office is located in Melbourne, Victoria. Its key operation is as a holding company of its owned operational businesses and as a central professional service provider (such as strategy, finance, HR, IT and legal) to those related entities.

As the operations of the above-mentioned operational businesses fall under the same senior management, the same board composition, policies and processes, Corval Group adopts the same human rights and other ethical due diligence processes across all entities.

03 Corval Group Operations & Supply Chains

Corval Group is the controlling entity of trading businesses: Conga Foods Pty Ltd (www.congafoods.com.au), dc Specialty Coffee Roasters (www.dccoffee.com.au), MaxFoods Pty Ltd (www.maxfoods.com.au), Pakval Warehouse Solutions (www.pakval.com.au), and Gourmet Secrets, which operate primarily in the field of food and beverage, and third-party logistics.

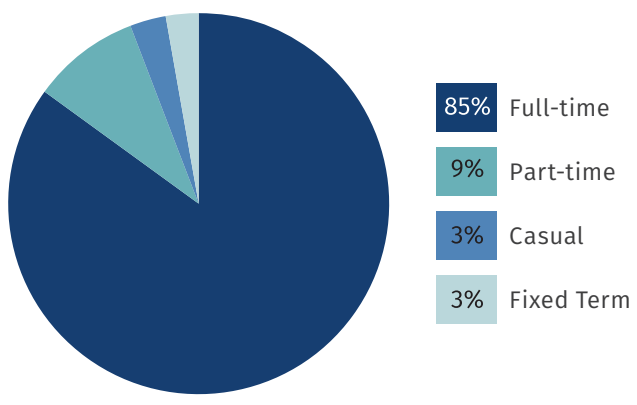
● Corval Group/Conga Foods Office & Warehouse Locations



Corval Group's Workforce

DIRECT EMPLOYEES

Corval Group has a total combined number of approximately 143 staff who are directly employed across the Corval Group entities as full-time and part-time, fixed term contract and casual employees.



LABOUR HIRE AGENCY WORKERS

In addition, during FY2022 Corval Group relied on labour hire agencies to provide workers for approximately 20 - 40 additional roles, the vast majority of the labour hire workers being employed directly by the Conga Foods business.

This represented approximately 15% - 25% of the total number of workers within the Corval Group during the period, which was significantly higher than normal. The uncharacteristically high necessity for labour hire workers in FY2022 was largely a result of the COVID-19 related government mandated lockdowns, necessary self-isolation rules requiring substitute workers and the multi-shift work not usually required within our businesses during regular operational conditions.



Established over 60 years ago, Conga Foods Pty Ltd's (Conga Foods) main operations include the sourcing, importing, marketing, selling (nationally and exporting) and distributing of quality Mediterranean-style foods in Australia. The company operates warehouses and offices in VIC, NSW, SA, QLD and WA.

Conga Foods' supply chain includes the importation of foodstuffs from various long-term suppliers and manufacturers principally based in Europe and South-East Asia and the subsequent warehousing, distribution and sale of the products to its customers, including Australia's major national retailers, large format and small Independent stores, continental grocery stores and major national wholesalers, key state wholesalers and occasionally international wholesalers.



dc Specialty Coffee Roasters' (DC Coffee) supply chain includes the sourcing of quality green coffee beans from Australian coffee bean wholesalers. Beans are procured from various places in South America, Africa and Asia, roasted here in Australia and supplied nationally to food service customers, wholesalers, independent stores and major supermarket chains. It is a core focus of DC Coffee to connect with farmers wherever possible (even where beans are ultimately purchased via Australian wholesalers) and to only source beans that have been sustainably and ethical produced.

DC Coffee also procures a number of accessories and equipment for the service of its food service customers such as coffee machines and coffee grinders, merchandise, crockery, takeaway cups, as well as complimentary consumable products, such as tea, chocolate and sugar.



The owners of Corval Group acquired 100% of shares in MaxFoods Pty Ltd (MaxFoods) on 1 November 2021. Any reference to MaxFoods in this Statement pertains to the period from 1 November 2021.

MaxFoods procures premium chilled seafood products, predominantly from European countries, such as smoked salmon, smoked trout and crab meat together with complimentary products such as Blinis. Raw seafood products are sourced by mainly European-based suppliers who then process the seafood in their factories before shipping the completed product to Australia and New Zealand. MaxFoods products are warehoused by Pakval, and then marketed and sold nationally throughout those two countries by a dedicated and directly-employed MaxFoods Customer Service and Sales & Marketing team to major retailers and independent grocers.



Pakval Warehouse Solutions (Pakval) is a 3PL provider specialising in the warehousing and transport of groceries and other consumer products for third parties. Pakval has warehouses in Melbourne, Sydney, Brisbane and Adelaide and also offers value-add and related ancillary services. Its main supply chain includes local transportation and logistic providers and suppliers of warehouse equipment and products.

GOURMET SECRETS

Gourmet Secrets is a small business whose core activity is the management of the DC Coffee online store (<https://dccoffee.com.au/collections/all>). Up until January 2022, Gourmet Secrets also managed the supply of coffee carts and respective operational staff to selected stores of DC Coffee customers, where coffee beverages are sold to in-store shoppers. As the only ongoing activity of Gourmet Secrets is the management of the online store for DC Coffee, we assess the entity as having minimal to no modern slavery risks (beyond the risks identified in DC Coffee itself) and accordingly do not comment on this entity from hereon in this Statement.

CORVAL GROUP

SHARED ANCILLARY PRODUCTS AND SERVICES

Although the main operational entities of Corval Group have different product foci, as articulated above, all supply chains rely on other ancillary products and services in meeting their operational requirements, such as:

Third-party storage facilities and transport and logistics solution providers (including international freight forwarders and local transport companies) for receipt and delivery of products.

The supply of warehouse equipment (forklifts, safety equipment and packaging materials) and office equipment and supplies (such as computers, phones, digital devices, furniture, stationary).

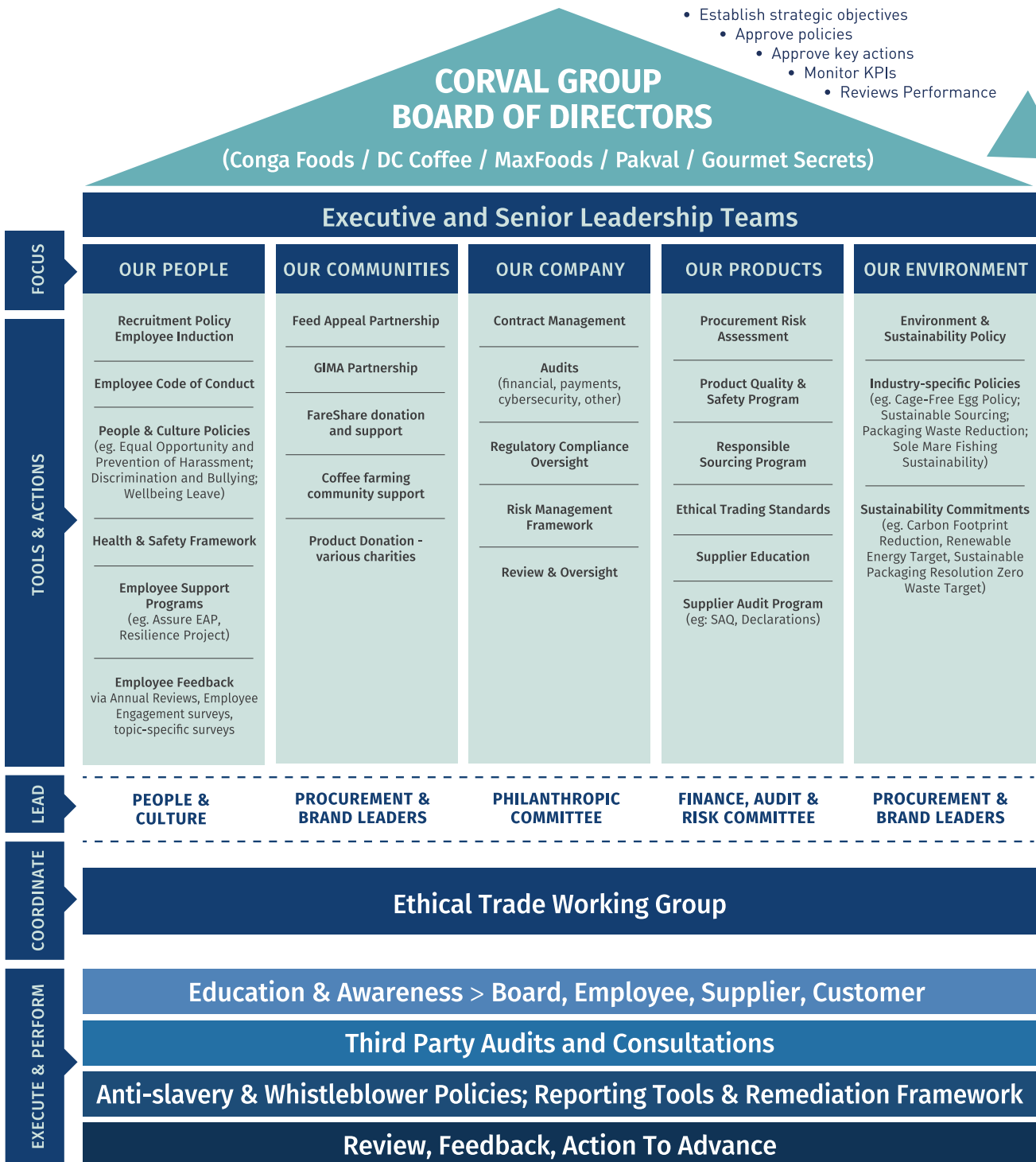
The waste management, cleaning and security companies that service physical State-based offices and warehouses.

The supply of professional services – such as Human Resources, Occupational Health & Safety Management, Accounting, Legal, IT, Marketing & Media services.

04 Identifying Modern Slavery Risks Operations & Supply Chains

Corval Group’s human rights due diligence is multi-tiered and encompasses a number of processes and procedures. Within its own operations, Corval Group has various policies, guidelines and codes of conducts which set out expected behaviours and rights and the company provides training therein (both internally and externally conducted) for Directors, Officers and Employees to ensure human right breaches can be identified and therefore acted upon.

- Establish strategic objectives
- Approve policies
- Approve key actions
- Monitor KPIs
- Reviews Performance

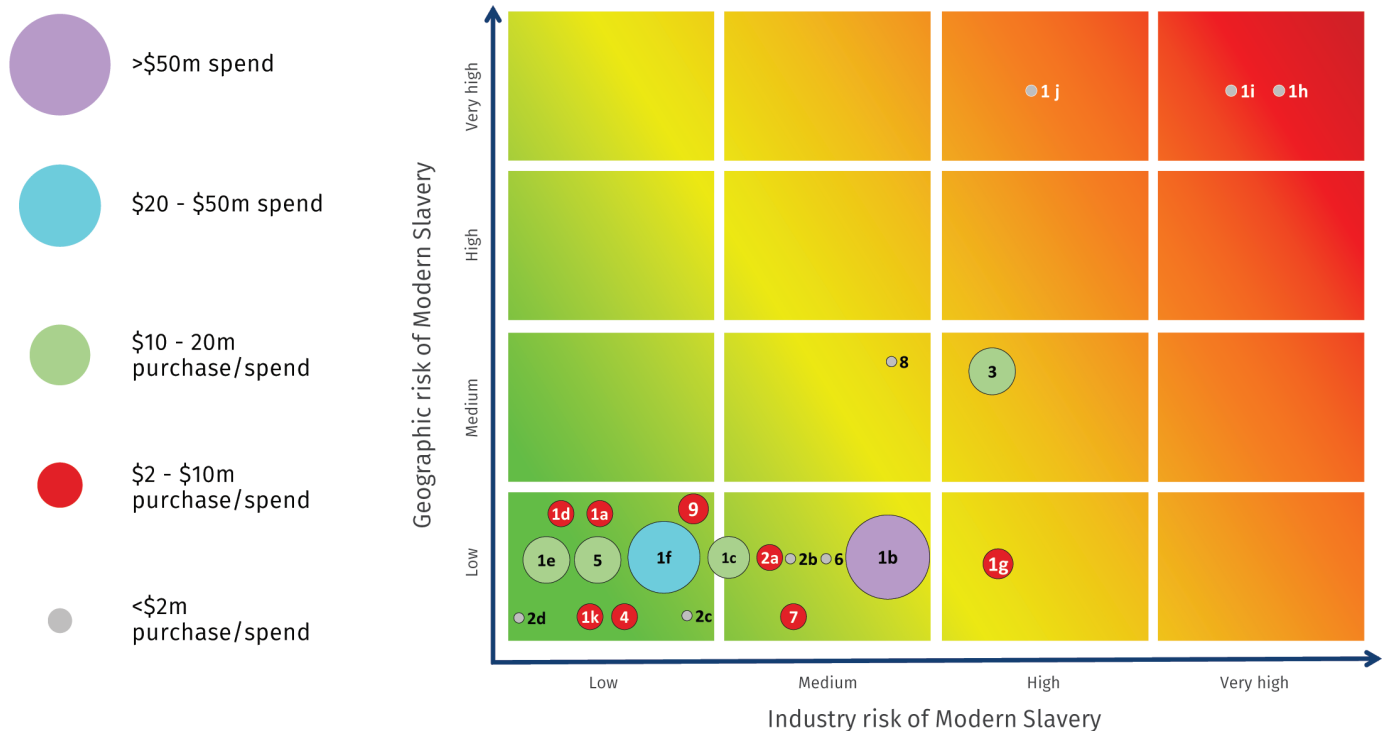


During this reporting period, Corval Group reviewed its assessments of the various operations of its main trading entities, including the newly acquired MaxFoods business, and their supply chains to consider where Corval Group entities are at risk of causing, contributing to or being directly linked to an incident of modern slavery practices either via our own direct operations or via our supply chains. We are aware that our visibility is limited in the multi-tier supply chains of some of our imported products and in that some of our product types, industries and countries of origin have a high prevalence of modern slavery incidences, we acknowledge that we have some vulnerability in our supply chains.

Actions that Corval Group takes to mitigate these risks are outlined in Section 5 of this statement.

Corval Group Modern Slavery Risk Radar

As a total group, high risk products account for less than 1% of our total supply chain expenditure.



PRODUCT/SERVICE CATEGORY

1. Food Product & Packaging – INTERNATIONAL

- Products from mechanised agriculture (eg. grains, legumes, etc.) – EU
- Products from labour-centric agriculture (eg. olives, grapes, tomatoes, vegetables, fruits, etc.) – EU
- Compound products from mixed goods (e.g. filled pasta, ready meals) – EU
- Smallgoods – EU
- Dairy – EU
- Aquacultural Seafood – EU, GREENLAND, NORWAY
- Wild Seafood – EU
- Wild Seafood – THAILAND
- Wild Seafood - INDONESIA
- Coffee Beans - VARIOUS
- Other (e.g. Cakes, packaging, coffee machines) - VARIOUS

2. Food Product & Packaging – AUSTRALIA

- Products from semi-mechanised agriculture (e.g. olives, grapes) – AUSTRALIA
- Smallgoods – AUSTRALIA
- Dairy – AUSTRALIA
- Packaging - AUSTRALIA

3. Logistics – INTERNATIONAL

4. Logistics – AUSTRALIA

5. Directly Employed Workforce – AUSTRALIA

6. Labour Hire – AUSTRALIA

7. Other (Consultants, Marketing Services, Cleaning Services, Repairs & Maintenance, Motor Vehicles, Office Furniture, etc.) – AUSTRALIA

8. IT & Communications Hardware – AUSTRALIA

9. External Storage – AUSTRALIA

We recognise that the due diligence of all suppliers in our supply chain is important to ensure we do business with suppliers who share our core values, our targets for sustainable and fair business practices and are committed to the same social, ethical and moral obligations and high quality standards to which we hold ourselves. We also recognise that the due diligence is challenging and there are practical limitations on effective enforcement of human rights throughout the supply chain where it spans so many borders, is multi-tiered and complex - as it is particularly so in the instance of Conga Foods.

Each of the operational entities have varying degrees and differing types of modern slavery risks inherent in their respective operations and supply chains. To ensure specificity to each respective supply chain, we undertake a separate analysis for each operational business, and report accordingly in the various sections of this Statement. Our scoping exercises and ongoing analysis for all entities involve mapping their respective supply chains, assessing the potential risk of modern slavery by reviewing specific geographic risks from where product and services are derived, together with sector and product risk indicators provided by expert organisations¹ and considering how we may cause, contribute or be directly linked to modern slavery.

Corval Group - Product & Packaging Procurement

As businesses operating predominantly in the food and beverage industry, we understand that we have a medium to high risk of modern slavery in our supply chain due to the nature of the work necessary in the production, processing, packaging and transport of food and beverage items.

Typically the harvesting of raw agricultural materials (such as picking fruit and vegetables – particularly commodities such as coffee beans) as well as the processing and packing of these raw materials in factories are all stages of the product cycle that often rely on seasonal and short-term, low-skilled labour which roles are usually fulfilled by migrant workers. There are substantial records and reports of incidences of gross violations of human rights in these product life stages worldwide, evidenced by informal arrangements with vulnerable people, payment of recruitment fees, confiscation of passports, underpayment of wages, harassment, bullying as well as unsafe and harsh working conditions. The ILO has identified that 11% of forced-labour victims globally are found within the fisheries and agricultural industries². Within our three food & beverage operational businesses, we have identified a number of imported products which fall within these two industries (such as seafood, coffee, olive oil, and tomatoes). Below are the highlighted areas of concern within each of these entities.

Corval Group prides itself on procuring products from carefully chosen suppliers in specific geographies relevant to the authenticity of the product, which in some instances restricts our choice of supplier. Given the relatively small size of the Australian market compared to the remainder of the global market some of those selected suppliers service, we acknowledge that we represent only a small volume of our suppliers purchases for a number of our products. Accordingly, our ability to directly control or forcefully influence supplier behaviour upstream is limited. Notwithstanding, we consider that we still play an important part in evolving the culture and mindset of all suppliers, irrelevant of our respective size, and the various actions we take to achieve this are outlined in Section 5 of this Statement.

Conga Foods



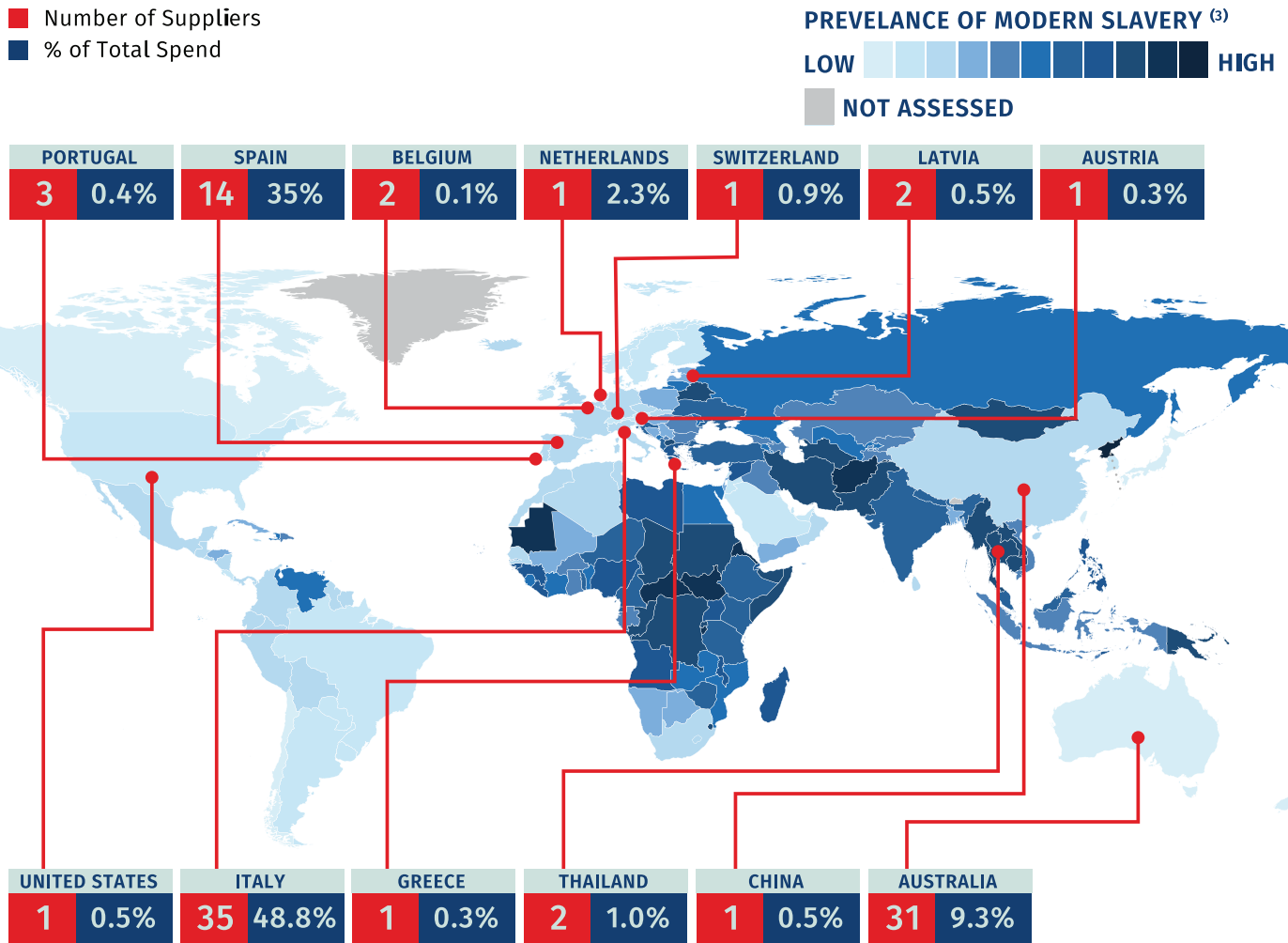
As the largest operating business of Corval Group, we continue to focus on the ongoing analysis and review of this business as our Group's priority. Conga Foods supply chain is complex, spanning approximately 1,300 products sourced from 13 different countries and suppliers with multi-tiered supply chains themselves, together with further required products and services to support its primary operations. We are aware that such a supply chain has visibility challenges and may have inherent modern slavery risks.

¹We relied on a wide variety of resources to conduct our analysis, including but not limited to Global Slavery Index, Walk Free Foundation, Anti-Slavery Australia, Anti Slavery Organisation, OECD Due Diligence Guidance for Responsible Business Conduct, Business & Human Rights Resource Centre, Ethical Trade Initiative & International Labour Organisation various publications.

²Global Estimates of Modern Slavery: International Labour Office (ILO), 2017

PRODUCT PROCUREMENT

Conga Foods works with almost 100 Tier 1 suppliers and enjoys long-term and mutually beneficial relationships with them, reflected in the lengthy duration of our trading relationships. Over 20% of our suppliers have been trading with Conga Foods for over 20 years and we have an average trading relationship of 14 years across all Tier 1 suppliers. As can be seen in the map of our product procurement below, over 98% of our product and packaging sourcing comes from countries with a low risk of modern slavery, 0.8% are sourced from medium-risk countries and only 1% is sourced from a high-risk country.



LOCAL PRODUCTS

The majority of food & beverage products the Corval Group entities sell are imported, save for a select range of Australian-produced products which account for 10% of our gross sales. We assess Conga Foods to have a low risk profile for modern slavery within its supply chain of local products, given it's product types and the strict regulatory framework of Australia. Notwithstanding, we are aware that modern slavery is often hidden in plain sight in our communities and that Australia, whilst of low risk, is not immune from modern slavery.

IMPORTED FOOD PRODUCTS

As a food importer and distributor, over 70% of Conga Foods supply chain expenditure is attributable to the purchasing of food products from twelve countries. The following table details the various countries and types of products we source.

⁽³⁾ In this map we have used the Global Slavery Index 2018 modern slavery prevalence data, the most up-to-date data source available at the time of risk assessment activities, to provide an indication of each country's modern slavery risk.

SOURCE COUNTRIES	KEY PRODUCTS
FOOD PRODUCTS	
Australia, Greece, Italy, Portugal, Spain	Agricultural products [labour-centric harvest & processing techniques] such as Olives, Tomatoes, Vegetable Products
Italy	Agricultural products [more mechanised harvest & processing techniques] such as Legumes and Grains (Pasta, Rice, Flour)
Australia, Italy, Spain	Vinegar
Australia, Italy, Spain	Smallgoods
Italy, Latvia, Portugal, Spain, Thailand	Seafood
Australia, Austria, Belgium, Italy, Germany, Netherlands, Portugal, Spain, Switzerland	Dairy (Cheese, Butter, Gelato)
Australia, Belgium, Italy, United States of America	Other (such as Cakes, Molasses, Preserves, Ready Meals)
NON-FOOD PRODUCTS	
Australia, China, Portugal	Packaging

Via the identification of modern slavery risk process outlined earlier, we understand that the some of our overseas suppliers operate in a high risk sector (such as agriculture and seafood) and/or, in few cases, high risk geographical location (due to local governance issues, impact of conflict, inequality and lack of basic social needs).

However, 98% of our food products & packaging are procured from tier 1 suppliers based in low-risk countries who have stable economical, socio-cultural and political systems, where the prevalence of modern slavery is low and where the rule of law and government responses to modern slavery is strong.

We consider, therefore that there is a low to medium potential for risk of modern slavery incidences within those supply chains. Our view is further supported by our suppliers third party certifications and their participation and detailed answers to our audit program, which specifically requests details regarding the percentage of temporary workers, migrant workers as well as conditions and pay relating to those workers.

SEAFOOD FROM THAILAND

Within the Conga Foods business, we assess that our highest risk is in the sourcing of canned seafood from Thailand, in that modern slavery and unethical practices are known to be prevalent in the seafood industry and even more so in Thailand as a country generally.

Key contributing factors to our high risk assessment of this segment of our supply chain include:

- Workers on board fishing vessels are often migrant workers who have limited language ability and come from particularly vulnerable backgrounds and desperate circumstances;
- In Thailand in particular, foreign workers are unable to partake in local unions and therefore have little to no worker voice, making them even more vulnerable to exploitation;
- The use of third-party recruiters is widespread;
- There is only minimal oversight of the actual working and living conditions on the fishing vessels and the way in which seafarers are treated during their time at sea; and
- The inherent nature of working at sea is remote, isolating and with precarious working conditions.

As a result, we identify the salient human rights risks in our supply chain accordingly as:

- Modern slavery such as forced labour, child labour and human trafficking;
- Debt bondage, arising from excessive recruitment fees;
- Lack of freedom of association & worker voice;
- Excessive overtime; and
- Unsafe and unhealthy working conditions

We have a number of mitigation strategies for this identified risk in place that are outlined in Section 5 of this Statement.



DC Coffee

DC Coffee's roasted coffee products account for 95% of total sales to customers. It follows that the highest risk identified in DC Coffee's operations is the purchase of raw product, specifically green coffee beans – not only for the sales value and the amount of supply chain expenditure they represent (approximately 50% of costs of goods sold) but also due to their country of origin and in that most coffee farmers are Tier 2 suppliers in our supply chain.

High quality coffee beans come from certain countries that have the best tropical climates and optimum conditions for growing coffee, known commonly in the industry as "The Bean Belt". Spanning across the equatorial regions of 5 continents (South America, North America, Africa, Asia and Oceania), the rainfall, temperature, altitude and soil make for perfect coffee-growing conditions. However, many of these countries are developing countries and have a high risk of prevalence of modern slavery. There is currently no real alternative for sourcing quality coffee beans in commercial quantities from highly developed nations where there are lower risks of prevalence of modern slavery.

GREEN COFFEE BEANS

DC Coffee procures green coffee beans from select farms located in Brazil, Colombia, Ethiopia, Nicaragua, Guatemala, India, Sumatra, Tanzania and Uganda, with the purchases being ultimately made via a network of reputable coffee bean wholesalers located in Australia. Key contributing factors to our high risk assessment of this segment of our supply chain include:

INDUSTRY & PRODUCT RISK

There are a high number of reported incidents of the following on coffee farms, particularly amongst migrant workers:

- Employers confiscating & holding workers ID such that they are unable to leave freely;
- Employers holding a debt against the worker for various travel expenses, food, and housing;
- Workers are sometimes placed in precarious and unsanitary housing accommodations; and
- Frequent use of child-labour as frequently workers' children are pulled from school to work alongside their parents on coffee farms, particularly during peak harvest periods.

Accordingly, considering both product and geographic risks, we identify the salient human rights risks in DC Coffee's supply chains to be:

- Forced labour incidents, particularly child labour;
- Debt bondage, unsatisfactory pay;
- Undocumented work;
- Little to no rights or benefits; and
- Poor safety measures.

Notwithstanding total green coffee bean purchases account for only 1% of the total product procurement of the Corval Group, we are committed to removing human rights abuses in our supply chain.

For further detail regarding our actions in improving labour rights compliance please refer to Section 5 of this Statement.

COUNTRY RISK

Many of these countries have instances of:

- Poor regulatory framework (particularly alignment with international conventions) and weak local governance;
- Presence of internal conflict;
- Large percentage of low socioeconomic status households with high poverty and low education rates;
- Vulnerability and systematic inequality; and
- Lack of basic social needs

MaxFoods



During this reporting period, Corval Group acquired MaxFoods, a market-leading Australian-based business selling packaged chilled seafood, mostly recognisable by its main brand Ocean Blue, in products such as smoked salmon, smoked trout and other seafood and related products. The business supplies national retailers and independent retailers in Australia and national retailers in New Zealand.

The majority of MaxFoods' supply chain expenditure is attributable to seafood suppliers and processing companies. The remaining minor expenditure components are logistics and smaller operational suppliers. MaxFoods supplier relationships are generally governed by a long-term contracts, with annual contractual renewal arrangements for adjustments in commercial terms.

We acknowledge that the seafood industry as a sector tends to have moderate to high risks of modern slavery. However, 95% of MaxFoods' products are produced via aquaculture methods as opposed to being wild caught. Not only is aquaculture one of the most efficient forms of protein production in the world, it also reduces the risk of depletion of vulnerable fish species in our oceans and typically has a much lower prevalence of modern slavery than the 'at-sea' fishing sector. Further, 93% of MaxFoods' seafood products are sourced from lower risk jurisdictions of Scandinavian (mainly Norway and Denmark) and European suppliers. Only a small portion of product (less than 9% of our annual sales) of MaxFoods' seafood processing suppliers operate in Poland and Indonesia, which have a moderate risk of modern slavery prevalence. Accordingly, we believe the modern slavery risk profile of MaxFoods is relatively low.

Our two seafood products sourced from Indonesia account for only 2.9% of our total annual sales. In particular, we are aware that the country was ranked 74th on the 2018 Global Slavery Index, where 0.47% of the population is estimated to be in modern slavery. Further, there is speculation that Indonesia's modern slavery situation has intensified since the onset of the COVID19 pandemic, which has triggered mass unemployment and an increase in the number of Indonesians living below the poverty line, making them more susceptible to exploitive employment opportunities. We identify the most likely modern slavery risk herein, with a higher risk of human trafficking and forced labour (particularly child labour) working as fishermen under harsh conditions where they may be exposed to unsafe and abusive working conditions, and insufficient (or no) pay.

Pakval



Unlike Conga Foods, DC Coffee and MaxFoods, Pakval operates in the logistics sector, offering transport, storage and related value-add services.

We assess the risk of modern slavery prevalence within Pakval operations to be low. Pakval operates exclusively within the jurisdiction of Australia as Pakval's end consumers arrange their own international shipping, with receipt of finished consumer product into Pakval's warehouses taking place from local providers. Product is stored and then on forwarded according to Pakval's customers instructions to other local destinations, by reputable third party transport contractors.

Pakval's workers are direct employees of Corval Group and the ancillary products and services Pakval relies upon are all common to other Corval Group entities and are discussed below.

Corval Group - Directly Employed Workforce

We believe that the likelihood that Corval Group directly causes modern slavery through our own operations, particularly our directly employed workforce, is low given the industry type in which we operate and our operational base in Australia. The Australian labour market is heavily regulated and our rule of law is among the most effective globally. This is not to say that modern slavery is solely an offshore issue, but rather that we consider our risk of causing, directly or indirectly or contributing to modern slavery within our own direct operations to be low. All Corval Group entities workforce are employed in Australia, save for a small number who are located in New Zealand.

Further rationale for our assessment of our low risk of modern slavery include the following:

None of the Corval Group entities themselves manufacture or process goods on site;

Over 70% of Corval Group entities employees have been with the respective businesses or over 12 months;

Employee relationships are not short term, with the current average period of employment being 7 years;

Over 80% of Corval Group employees are professional and skilled workers; and

Less than 4% of the workforce are employed on a casual basis.

Corval Group is committed to supporting our workers personal growth and professional development, holding as a key priority their health, safety, security and wellbeing. Corval Group and its related entities insists that all employment within our entities is voluntary and that all employment conditions are, at a minimum, in compliance with local laws and regulations, including any applicable awards.

Corval Group strives to create a work environment which is inclusive of all people, regardless of gender, age, race, disability, sexual orientation, cultural background, religion, family responsibilities or other areas of potential difference. As a company and a family, we have always been proud and supportive of diversity and inclusion, and enjoy a steady minimum of 40% female representation of our Board of Directors and Advisory Board.

Considering the nature of our direct operations, we consider that Corval Group entities are at greater risk of contributing or being directly linked with an incident of modern slavery through our supply chains, rather than directly causing an incident of modern slavery within our own direct operations.

Corval Group - Ancillary Products and Services

Beyond our highest potential risk of modern slavery area being certain product procurement within each entity, we acknowledge other potential risks exists in other areas of our supply chains. For the purpose of this Statement, only areas of product and service procurement within our operations that we have identified as a risk of prevalence of modern slavery are referred to herein.

There are a number of ancillary product and services that are common to all of the Corval Group entities that are required for the businesses to carry out their primary operations. Included in some of these 'shared' services and products where we have assessed a potential modern slavery risk are:

Labour hire agencies

Office & Warehouse cleaning & security

Transport & logistics

IT & communication hardware

Nationally, these products and services combined account for only approximately 14% of our total supply chain expenditure. Notwithstanding, as we do not typically have in-depth visibility of the suppliers of these services and secondary products, analysis and supplier audits for these elements of our business are intended to form part of our overall company-wide human rights due diligence program. As with all of our primary product suppliers, all suppliers to our businesses (regardless of their size or type) are subject to our Anti-Slavery Policy and Ethical Trading Standards.

LABOUR HIRE

During this reporting period, of the entire Corval Group of workers, around 15 to 25% were labour hire workers. This was unusually high given our business requirements to have multiple shifts due to government restrictions and lockdowns as a consequence of the COVID-19 pandemic as well as due to the expansion of our operations in NSW and the transition of the MaxFoods business.

The labour hire industry is renowned for having a higher modern slavery risk due to a number of factors including the reliance on migrant workforce (who may have temporary visa arrangements and typically have lower language competency), a higher tendency for informal contractual arrangements, prevalence of outsourcing and frequent occurrence of workers not being paid fairly or according to minimum award rates, being required to work excessive hours, and some businesses not having sufficient health and safety measures.

Corval Group aims to minimize its reliance on labour hire workers however acknowledge that during peak periods and at times of operational challenge (such as the absences in work attendances due to the pandemic and recent government regulations, abnormal disruptions to global supply chains & logistics), the ability to support our operations with additional labour hire workers is a necessary requirement of our operations.

TRANSPORT & LOGISTICS

We acknowledge that there is a medium to high inherent risk of modern slavery in the transport and logistic segment of our supply chain, where operators can be subject to long hours, overnight work and hazardous conditions. Given the high volume of imported products in our operational businesses, we identify a higher risk arising from international logistics for potential human rights abuses. In particular we identify a higher risk at ports in container loading and unloading and in maritime freight where workers can be isolated or away from home for long periods of time and conditions (such as natural weather conditions as well as working and living conditions provided for by the ships operators) can be poor with limited access to medical care and health protection.

OFFICE & WAREHOUSE CLEANING AND SECURITY

Corval Group procures services from external specialist service providers for its office cleaning and maintenance as well as office and warehouse waste management. Whilst we acknowledge that the cleaning & waste management industry may have a higher risk profile for human rights abuses, we assess our risk in relation to these parts of our service procurements as low, given that we have long-term arrangements with our various services providers who are also locally-based where regulation & enforcement of workplace and employment rights are high.

IT & COMMUNICATIONS HARDWARE

Corval Group has regular procurement expenditure relating to the purchase of computers, mobile phones, and other such information technology & communications hardware. The procurement of such items carry a comparatively higher modern slavery risk, due to the higher risk category of the 'electronics' industry as well as the geographical location of the employees in countries (such as Asia Pacific countries including China, Thailand, Philippines, India, Vietnam and Malaysia) where there are lower standards of working conditions and poorer human rights records, particularly in relation to forced labour risks, as well as generally poor government response.

Compounding the issue is the fact that this industry includes extremely powerful corporations (such as Apple, Hewlett Packard, Dell and Samsung) which contributes to a significant power imbalance with the lower tiers of their supply chains where worker's basic rights are often abused. Corval Group has very limited visibility across these conditions given the multi-tiered nature of the many components required in the supply chain to manufacture, pack and ship these products and in that we purchase finished products from local retailers, albeit we only purchase from reputable suppliers.

05 Our Actions

Our focus in 2022 has been to build on the processes and policies put in place in 2020 and 2021 and to expand our human rights audit program beyond our largest operational entity, Conga Foods, followed by DC Coffee. We continued to roll out our modern slavery risk analysis & audit program in this reporting period to Pakval and MaxFoods as well as ancillary product & services provided to the businesses by suppliers in common, such as labour hire agencies, transport & logistics, office & warehouse cleaning and security.

ETHICAL TRADE WORKING GROUP

Corval Group’s Ethical Trade Working Group is made up of various stakeholder group representatives such as a Director and senior leaders of Corval Group and representatives from People & Culture, Quality Assurance, Procurement and Legal across the key operational businesses of the Corval Group and meets at least once a quarter.

The Ethical Trade Working Group’s role is to continuously review, reassess and further develop the Corval Group’s modern slavery action program to ensure any modern slavery risks in our operations and supply chain are identified, addressed and remediated with the eventual elimination of any modern slavery risk. Members of the Working Group also hold key responsibilities in furthering Corval Group’s commitments to other ethical and sustainable practices more generally.

A nominated representative from this Working Group provides regular updates to the Senior Leadership Team, which also includes common Directors of the Board of Corval Group and its controlled entities. Further to this main group, each operating entity has a sub-team responsible for deeper analysis of their operations and for actioning the respective entity’s annual audit program.

Corval Group Directly Employed Workforce

Corval Group continuously attracts and retains quality staff by looking after our employees and being committed to their ongoing wellbeing. During this last reporting period, we introduced Assure’s Employee Assistance Program (EAP) which is available to all employees and their immediate families and provides free, confidential advice and support on personal and professional matters. Staff are reminded of and encouraged to utilize this support regularly via emails and monthly staff updates.

We have a number of wellbeing-related, leave and working from home/flexibility policies and our directors and senior leadership team frequently remind staff of the support and programs available to them and to other elements that may promote good physical health and mental and emotional wellbeing.

Corval Group conducts annual reviews of employee wages and salary agreements to ensure all employees continue to be remunerated fairly and appropriately (in relation to their skills, experience, roles and responsibilities and relevant laws) – in most instances well above minimum award requirements. This coincides with an annual employee review process, where the employees rate their satisfaction on a list of measures and facilities a two-way conversation between the manager and employee, so we can address any concerns raised and also ensure we are supporting our employees with skills development and other personal and professional objectives.

As part of our commitment to being a diverse and inclusive place to work, Corval Group commenced its company-wide rollout of a third-party expert led diversity, inclusion and unconscious bias awareness program. Beginning in this reporting period, this training will be completed in FY2023. Whilst diversity and inclusion have always been guiding principles at Corval Group, we recognize that we can do more to contribute to effective positive change. This program encourages all staff across all areas of the businesses to take the opportunity to self-reflect on the existence and manifestations of their own biases or those of people around them, to create better shared understanding and to help remove bias anywhere it exists at an individual and organizational level.

Corval Group continues inviting worker feedback via our regular staff engagement surveys which are conducted anonymously and at various times throughout any given year. These employee engagement surveys allow us to understand employee satisfaction and identify any areas of concern that need to be addressed. The survey participation rates during this reporting period were consistently strong, demonstrating a high level of engagement, with results being overwhelmingly positive despite an intense and challenging year for many of our employees.

Corval Group Human Rights Framework, Policies & Processes

We continuously review and update various key policies that underpin our commitment to responsible business, including:

Recruitment Processes

When looking for new employees for our various businesses, Corval Group entities only use highly reputable employment agencies to source workers and we prohibit any worker fees for recruitment.

Employee Code of Conduct

This guides the everyday conduct of all employees, directors and managers to ensure we maintain a high level of business integrity. The Code of Conduct specifies the absolute minimum requirements of expected behaviour in relation to safety, diversity and inclusion, human rights, community, the environment and governance. We maintain strict onboarding controls for all new employees, including their confirmation of acceptance of these terms as a condition of their employment. This Code of Conduct includes the strict prohibition of any forms of exploitive behaviour, including modern slavery.

Ethical Trading Standards

These Standards specify the minimum standards of behaviour that we require our businesses and our suppliers to meet in the areas of modern slavery, labour and human rights, legal compliance, animal welfare, environment protection, and business ethics throughout their operations and supply chains. These standards are published on our Conga Foods website, are frequently circulated to suppliers and clearly articulate our zero tolerance for:

Modern slavery, including child & forced labour	Animal cruelty
Work environments that are deficient in health & safety levels or are discriminatory towards workers	Any breaches of environmental law
Underpayment of wages or worker-paid recruitment fees	Any form of corruption or bribery

Any suspected breach of these Standards can result in an immediate suspension of our trading relationship with a supplier until such time the breach can be investigated and, if possible, remediated or alternatively gross misconduct can result in an immediate and complete termination of our relationship, with serious breaches being reported to the relevant authorities.

Anti-Slavery Policy

This Policy applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants, suppliers and any other third-party representatives and their associated operations. This policy outlines the way in which we seek to address modern slavery risks, including ensuring our own entities and our suppliers:

Uphold our commitments to address modern slavery risks (including accepting our contractual clauses in relation to same)
Undertake assessment and audit processes (of operations & supply chain) to regularly identify and monitor modern slavery risks
Ensure employees are engaged voluntarily, that they have freedom of association and are paid (at the very least) minimum award wages
Prohibit worker-paid recruitment fees
Make accessible a grievance and complaints (whistleblower) mechanism available to workers
Report any suspected modern slavery incidence and engage with impacted persons to remedy any adverse impacts
Undertake corrective action for addressing any non-compliance with our Anti-Slavery Policy

Grievance & Complaint (Whistleblower) Policy

This policy encourages employees (of any term or type), associates, suppliers (including their employees, contractors, consultants, service providers and business partners), consultants, or a relative, dependent or spouse of any of the above individuals, to report a suspected concern regarding human rights (or other such grievances as fraud, illegal or unethical business practices, breaches of legislation and criminal behaviour).

Our Whistleblower Policy is published on our website and details how someone can confidentially and anonymously report serious misconduct and how our companies undertake to respond, including the investigation procedures and outcomes.

Any instance of suspected or actual breach of any of the aforementioned policies are reported to the Board, and expeditiously investigated and dealt with.

Responsible Sourcing Program

Corval Group's Responsible Sourcing Program guides our purchasing decisions and embeds risk management principles to assist in mitigating human rights and modern slavery risks in our supply chains. The Program is underpinned with the aforementioned policies and standards and outlines our Supplier Audit Program.

NEW SUPPLIERS

Corval Group requires all new suppliers of any product that Conga Foods, dc Specialty Coffee Roasters or MaxFoods intends to sell nationally in Australia to complete the Approved Supplier Forms as prescribed by the Quality Assurance department, together with the detailed ethical practices self-assessment questionnaire before commencing trade.

EXISTING SUPPLIERS

Suppliers determined to have medium or high inherent risks receive a detailed self-assessment questionnaire, which requests information regarding the supplier's operational and supply chain modern slavery risk management, workplace practices, environmental management and governance. Suppliers determined to have a low inherent risk are required to respond to a shorter questionnaire that captures key information against our salient issues, including forced or child labour and various indicators for modern slavery risks including health & safety measures, recruitment practices, contractual and pay requirements.

Raise Awareness & Contractual Obligations

Corval Group continues to include clauses in any new contractual arrangements that specifically prohibit modern slavery and that specifically assigns Corval Group entities the right to audit suppliers as part of the procurement process. We continuously take the opportunity, wherever possible, to educate the other contracting parties around the existence of modern slavery, our requirements under the Act and ensure that all suppliers also share these commitments to ethical behaviour in order to transact with us.

Notwithstanding the number of years that modern slavery has become an increasingly addressed issue globally, a number of suppliers in developed nations, including Europe's strongest countries, appear to lack understanding in the prevalence of modern slavery in democratic countries where there is high rule of law. Accordingly, we will continue to invest in our communications and efforts to educate and raise awareness of the existence of modern slavery and modern slavery risks with suppliers across the board.

Education & Training

Corval Group has developed a training module for mandatory, regular internal employee training which covers various pillars of our due diligence program such as our Employee Code of Conduct, Ethical Trading Standards, our Anti-Slavery Policy and Whistleblower Policy & Grievance reporting and how to recognize and report any concerns identified with modern slavery or other serious forms of unethical behaviour or malpractice.

The company also offers third party educational courses to various employees as required. Various members of the Ethical Trade Working Group also participate in various forums, presentations and training regarding modern slavery, human rights and sustainability.

As some of our suppliers operate in different legal and cultural environments throughout the world, beyond general awareness and obligatory participation in our Supplier Audit Program and acceptance of our policies, Corval Group aims to educate our suppliers wherever possible. We aim to develop some more specific resources in order to better support this objective, particularly given some cultural and linguistic obstacles.

Review & Reporting

KPIs, which are frequently reported to the Board, have been developed and include metrics on health & safety (including workplace injuries and incidents), complaints, worker turnover & absenteeism, and the number of employees completing mandatory refresher training on key policies.

Reports regarding meetings of the Ethical Trade Working Group, entities' supplier audit program and other such matters are regularly tendered and discussed.

2022 Supplier Audit Program

Various separate Corval entities undertook their audit programs, as detailed below. In addition, in this reporting period the Corval Group audited its labour hire providers (predominantly engaged for the Conga Foods business, but also used within other businesses such as Pakval) together with a number of its transport and logistics providers as well as the Group's Head Office & Warehouse cleaning and security providers.

LABOUR HIRE

Via our 2022 audit program, we were able to confirm our labour hire providers have established policies and processes in place with a number of providers being required to publish an annual Statement under the *Modern Slavery Act 2018* (Cth) themselves.

We believe our risk of inadvertently contributing to a modern slavery incident via our labour hire arrangements is lowered due to the close relationships we have with a select handful of highly reputable providers with whom we have contractual arrangements and who have an assigned account manager who frequently conducts site visits. All of our labour hire agencies are members of Australian and New Zealand recruitment industry associations such as AHRI and RCSA, with a number of Australian jurisdictions mandating licenses for labour hire providers. In this reporting period, our labour hire providers have completed an Ethical Trade due diligence questionnaire and/or declaration and have made a direct commitment that they comply with all applicable legislation and standards regarding labour, health & safety and the environment, and that they adhere to our Anti-Slavery Policy & Ethical Trade Standards.

TRANSPORT & LOGISTICS

In order to mitigate Corval Group's risk in this sector, we collaborate closely with our suppliers, relying on the same network of international logistic service providers we have worked with for multiple decades who have a proven record and local Australian offices to manage the importation of our products. We audited the majority of our Tier 1 key logistics partners in FY2022 and will continue to audit the balance in future periods.

Entity Specific Action

Conga Foods



SEDEX MEMBER ETHICAL TRADE AUDIT (SMETA)

In FY2022 Conga Foods successfully completed it's first SEDEX audit with zero corrective actions recorded.

In order to independently verify the relevance and effectiveness of our existing policies and process in our own operations and to be better assured that workers in our supply chain are treated fairly and in accordance with the law, particularly in relation to labour hire workers who are typically more at risk of modern slavery incidences, Conga Foods undertook a 4-pillar SMETA audit during this reporting period. This audit allowed us to review the processes and programs we have in place.

Via this SEDEX Audit as well as our own regular reviews, no modern slavery concerns within our own operations were suspected or identified during this reporting period.

SUPPLIER RISK MANAGEMENT

In terms of our imported products, ensuring that the agricultural raw materials for our products and procurement of seafood products are responsibly produced is a challenge given that we may not always have direct contact with the farmers or the secondary-tier suppliers themselves.

2022 Supplier Audit Program

Following the years 2020 and 2021, where 100% of our total tier 1 food product suppliers underwent our audit program, we re-audited 45% of our product suppliers. Of all of the suppliers audited in 2022, 55% have social ethical third party accreditation, such as SEDEX, and all responses were reviewed in light of previous responses to identify how, if any, a supplier's operations or response to modern slavery has altered over time.

We have noticed an increase in the number of overseas suppliers who have sought third party certification (such as SEDEX) in that time. During this period, we commenced looking deeper into our supply chain to tier 2 suppliers and will aim to include some of the tier 2 suppliers in our audit program in future years.

SUPPLIER RELATIONSHIPS

We acknowledge that Conga Foods cannot directly control the human rights (including modern slavery) risks throughout our supply chain. It is imperative to us, therefore, to only maintain relationships with reputable suppliers who we believe conduct their businesses responsibly and who agree to be bound by the terms of our Ethical Trading Standards and Anti-Slavery Policy.

We maintain close and long-standing relationships with our suppliers, choosing to collaborate over lengthy periods of time, rather than engage in short-term, ad-hoc or 'one-off' sourcing contracts. This allows us to develop a deep level of trust and understanding of our suppliers' businesses, their owners and key management and allows us to have confidence in the efficacy of their programs and policies and in their accuracy of any self-assessments we may require them to complete.

Conga Foods does not set unrealistic cost targets and/or delivery time frames that could only be achieved through worker exploitation. Where possible, we conduct on-site visits of our suppliers' offices and factories, often having the chance to connect with various levels of employees, beyond the supplier's Executive team.

SEAFOOD IN THAILAND

We have identified our canned seafood products from Thailand as having a high risk of modern slavery as described in Section 4 of this Statement. To mitigate those risks, Conga Foods strictly prohibits sourcing seafood from trans-shipment at sea and ensures 100% of our canned seafood product from Thailand is sourced from suppliers who are members of the Supplier Ethical Data Exchange (SEDEX), a world leading not for profit organization dedicated to drive improvements in working conditions and responsible, sustainable ethical business practices in global supply chains.

Each can of tuna is printed with the specific fishing zone and our auditing system allows us to track any can of tuna down to the individual fishing vessel, fishing zone and period of catch.

Further, Conga Foods undertakes an annual audit of Thai suppliers of seafood via completion of a self-assessed questionnaire together with the provision of supporting documentation (such as valid, up-to-date policies and third-party audits) and in-person, on-site visits.

In 2022, we began investigating various NGOs and associations who have direct access to the seafarers and other migrant workers within the Thai seafood industry, who are amongst the most exploited population in Thailand, filling most of the low-wage, low-skill jobs with no ability to form labour unions. We recognize that being connected, involved and supporting such organisations will allow us to contribute to a direct positive impact on this segment and we look to future periods to progress our work in this area.

SUPPORTING LOCAL COMMUNITIES

Conga Foods acknowledges that there remains an unacceptably high level of hunger among many vulnerable Australians. Any person of vulnerable background is more susceptible to being (or becoming) a victim of human rights abuses.

In 2022, Conga Foods continued to support a number of food charities via much needed product donations, particularly after the sharp increase in demand for food relief across the country after the devastation caused by a number of natural disasters and the continued impact of the COVID19 pandemic. Via Squeaky Gate, our Australian olive oil brand, Conga Foods continued its multi-year commitment to Feed Appeal as the Principal Partner of their Rural Grants Series. The Rural Grants Series has delivered an additional 1 million meals to vulnerable communities. We also had a staff team participate in FareShare's Footsteps Challenge, raising money to help address food insecurity across Australia.



DC Coffee

OUR SUPPLY CHAIN

Through our ongoing scoping analysis and review, we identify that we carry a high risk of inadvertently contributing to modern slavery via our green coffee bean suppliers who operate in both a high risk sector as well as a high risk geographical location.

To some extent, our modern slavery risk is mitigated where we are able to purchase beans from existing, recognised certifications (Fair Trade), however we are aware of reported incidences of coffee being produced by forced labour that has been stamped slavery-free by top certification schemes, so we are conscious that it is insufficient to rely on such certifications alone. Regardless of the certification status, we recognise more work needs to be undertaken in our supply of green beans and that we need to continue to delve deeper and carry out more detailed investigations within our secondary tier suppliers.

We prioritise working with suppliers who consider social responsibility and sustainability as fundamental aspects their coffee business and where they implement their own ethical sourcing programs. We place reliance and trust in our green bean wholesalers (effectively our Tier 1 suppliers) who have direct relationships and frequent communications with the coffee farmers themselves. These wholesalers also conduct regular physical visits to the coffee farms and a number of our wholesalers have implemented models to assess the risks of human rights abuses in their own supply chains and have developed policies, processes and training to address accordingly. The majority of our wholesalers are committed to improving the sustainability of the industry, the individual farms, the environment and the people and communities from where they purchase coffee beans and are involved with various initiatives to that end.

We also continue to build direct relationships with a number of the coffee farmers from where our beans are sourced including periodic travel to their coffee farms (notwithstanding the purchase is ultimately made through local brokers). Previously, all of our green bean wholesalers took part in our audit program, along with a significant portion of our other suppliers (including other consumable products (such as tea and milk), packaging and ancillary products (such as takeaway cups and crockery) as well as services such as coffee equipment servicing and transport & logistics. During this period, we began the process of working with our Tier 1 suppliers to further audit and gain greater transparency and confidence in the subsequent levels of the supply chain.

SUPPORTING COFFEE FARM COMMUNITIES

While producing trusted premium coffee for Australian consumers is our specialty, helping communities in coffee bean-growing regions in order to create a reliable, sustainable industry is at the core of our business.

Striving for Equality

In this reporting period, we continued support of Flores em Ação (Flowers in Action), which is a project empowering female farmers, recognizing their work and commitment in producing specialty coffee. This year we were responsible for purchasing 90% of the crop of one of their members. Through our support of such initiatives, we aim to unlock opportunities for women in an otherwise heavily male-dominated industry.

Max Foods



After MaxFoods was acquired by the Corval Group on 1 November 2021, MaxFoods operations were mapped and assessed for any potential modern slavery risk. As part of the transition process 100% of Tier 1 suppliers were subject to the Corval Group's audit program, completing a detailed questionnaire and providing evidence of third party certification where applicable.

As aforementioned, all of the suppliers are based in Europe & Scandinavia, with the exception of one each in Poland and Indonesia. Both of our suppliers in those countries hold third party certification for social, ethical and environmental compliance.

As a key element of our acquisition, our Director and our MaxFoods CEO ensured physical visits to the key supplier factories and offices were undertaken at the earliest possible after the government mandated travel restrictions (due to the COVID pandemic) were lifted. Through our continuation of assessment, actions and audit program in 2022, there was no evidence of modern slavery existing or occurring in our operations and/or supply chain during this period.

Notwithstanding, we acknowledge that the risks are ever-present and that we will continue to build on our actions to mitigate the risk of modern slavery in our operations and supply chain.

Pakval



Corval Group acknowledges that modern slavery is not just a problem unique to product-based industries but rather it is also pervasive in service industries.

During this reporting period, Pakval's operations were mapped and suppliers underwent our audit program. As the only non-food & beverage entity of the Corval Group, Pakval's audit program was focused on suppliers in the transport and logistics industries, many of whom have been providing services to the Corval Group for multiple decades and who were audited within the Corval Group FY2022 audit program.

06 Remediation Processes

In the unfortunate event Corval Group suspects the occurrence of modern slavery within our supply chain, we are prepared to work with urgency and immediately carry out or enforce corrective measures.

We acknowledge that there is no 'one size fits all' when it comes to remediation of labour rights abuses however wherever we suspect an incident, we will engage collaboratively with the affected supplier and seek constructive dialogue and remediation of the incident and set clear KPIs to monitor the effectiveness of the steps taken to ensure that no further modern slavery incidences occur. We will seek to exert our leverage as much as possible to achieve improvements and mitigate labour rights abuses with that supplier moving forwards.

Where any gross violation of human rights is identified, including modern slavery incidences, Corval Group may immediately initiate action to remove the supplier from the supply chain temporarily and/or cease business dealings entirely. Where a suspected incident has occurred within our own direct operations, any employee involved may face disciplinary action and/or dismissal. In all instances, Corval Group may also report the incident and the offending party to the relevant authorities as well as, working with the supplier where relevant, seeking to provide satisfactory compensation for the harm suffered by the identified victim of the human rights abuse.

07 Evaluating the Efficacy of our Actions

During the reporting period, we did not identify any incidences of modern slavery nor any risks requiring additional remediation steps beyond the risk assessment and audit program described in Sections 4 & 5 of this Statement.

However, our conversations continue with select suppliers who we believe can further their policies and processes to specifically address modern slavery concerns. Although many of our larger suppliers already report on human right matters, a minor number of our smaller suppliers do not necessarily appreciate the prevalence of modern slavery incidences in supply chains – even more so where the supplier is located in a highly developed country. Despite the growing awareness and the regulatory focus on human rights worldwide, some suppliers still do not believe the issues to be pertinent to them and we believe that via the implementation of our audit program, we continuously raise their awareness and understanding.

By encouraging our suppliers to offer greater education and training for their staff, or implement policies specific to modern slavery where required within their operations, or indeed implement audit requirements upon their own respective suppliers, we believe that there stems a follow-on effect throughout the supply chain from our direct actions.

During this reporting period, numerous suppliers confirmed with us that based on our requests and expectations, they will be introducing more formalized human rights policies in their businesses and corresponding education and training for their workers.

We continuously work to deepen our understanding and assessment of our own supply chain and our suppliers, however we acknowledge that measuring efficacy of our own actions is not necessarily a straightforward task and we are still developing the means by which we assess our effectiveness. In the meantime, we continue to encourage our suppliers to increase their focus on their own respective human rights due diligence programs and to further develop the analysis and identification of risks (including modern slavery) in their broader supply chain.

08 Other Relevant Information

IMPACT OF COVID-19

Like many other businesses, whilst the initial impact of COVID19 felt in FY2020 subsided, a number of ongoing challenges identified in FY2021 continued to impact our business operations in FY2022.

Such impacts of the pandemic include, but were not limited to, workforce challenges, supply chain pressures, the unpredictable and sudden fluctuations in demand for certain products (and the pre-emptive need for our entities to hold higher level of stocks) and the continued toll the extended lockdowns had on Victorian businesses, particularly hospitality venues. A number of our DC foodservice customers have closed their venues permanently and others are being supported by us with extended payment terms and discounted invoices. This has been devastating for those customers and their staff, however has also meant that our own DC staff have been unable to pursue as much activity in their Supplier Audit program as had been planned in FY2022 due to stretched resources and the urgent need to address customer support and day to day business.

We are particularly conscious of the wellbeing of our staff as many have experienced above-normal levels of fatigue, poorer mental health and we are aware of high levels of 'burnout' common across industries. Our staff's safety and wellbeing remain one of our priorities. Corval Group has continued to issue frequent communications and education notices, together with details of available programs and support to staff in order to improve their well-being. Corval Group continues to undertake anonymously conducted employee pulse-checks, to ensure employees are feeling connected and supported by Corval Group during these challenging times.

Restrictions on travel set by relevant governments limited our usual on-site visits of suppliers, however we were glad to resume these in FY2022 for some of Conga Foods and MaxFoods suppliers and look forward to continued visits in FY2023. Notwithstanding, we enjoy regular communications via phone, email and video conferencing with all of our product suppliers.

IMPACT OF WORLDWIDE EVENTS

The second half of FY2022 saw the invasion of Ukraine by Russia. The impact of this ongoing war is well documented and is affecting everything from supply chain logistics & product procurement timelines, to global famine and food prices. Many of our commodity products and specialty seafood items have been impacted in price and there are many 'pressure' points on our suppliers. We continue to work very closely with them, ensuring best efforts to satisfy our customer demands for minimal price rises whilst balancing the need to acknowledge our suppliers inevitable position.

We choose to view the above circumstances as abnormal challenges that will ultimately subside. We are conscious to ensure our expectations are adjusted accordingly and no undue pressure is placed on our suppliers, which could inadvertently increase pressure on their staff and their supply chains, thereby increase the risk of unsafe work practices or incidences of labour rights abuse.

IMPACT OF MAXFOODS ACQUISITION

Although the addition of the MaxFoods business in FY2022 was an exciting opportunity, our immediate focus after taking over the business in November 2021 was to ensure the smooth transition of supplier relationships, customer supply and successful integration of the business into our existing platforms, processes and people.

Naturally this diverted many Corval Group resources (including quality, compliance, brand managers and procurement teams) that would otherwise have been directed to progressing other initiatives and programs, including our Supplier Audit program, during the period.

09 Future Developments

We will continue to drive improvements to our analysis, processes and actions via regular meetings of our cross-functional Ethical Trade Working Group.

AUDITS

We are cognisant of the fact that modern slavery is a complex area with problems often hidden from our view in secondary tier supply levels. We will continue to work closely with our suppliers to delve deeper into areas of any concern and/or where the supply chain is multi-tiered and we do not have immediate view of secondary tier suppliers, to ensure we achieve continuous improvement in our approach, transparency and influence on our supply chain and that we can better identify and understand modern slavery risks throughout our supply chain.

In future reporting periods, we will continue to expand our auditing program to non-food product procurement (such as packaging materials, marketing merchandise, office furniture and hardware (including electronic devices) and warehouse equipment and service suppliers (such as logistic providers, office contract cleaning, and ancillary support services such as legal, finance and IT), so as to ensure that all suppliers and service providers uphold our same ethical standards, values and product quality.

Where we have identified in our current and previous audit programs potential gaps in understanding of modern slavery by some of our smaller suppliers, we will continue to support them and work collaboratively to further raise awareness and educate them. We recognise that modern slavery incidences are often hidden and accordingly, we will look to offer further training for our procurement teams.

TRAINING

All new and existing employees receive information and training in relation to our Grievance and Whistleblower Policy and available reporting mechanisms, together with physical display of notices and anonymous reporting methods within common meeting areas in the workplace. However our recent SEDEX audit identified a lack of efficacy in this training for labour hire workers.

We recognize that effective grievance mechanisms are vital to protecting worker rights in our own operations and those of our suppliers. Accordingly, in the forthcoming period, we will consider alternate ways promote our policies & methods of reporting a grievance (anonymously or otherwise) for all current and new employees, suppliers, contractors and associates in order to more effectively encourage understanding and reporting of modern slavery risks.

Entity Specific



SEAFOOD IN THAILAND

We will continue the mapping of our supply chain to the secondary levels of supply, particularly in relation to seafood sourced from Thailand. We will continue to investigate opportunities for support, collaboration and involvement with relevant NGO or independent observer programs in order to increase transparency and improvement in working conditions on the fishing vessels and around the use of migrant labour.

AUSTRALIAN OLIVE OIL

We understand that exploitation of workers in the horticultural industry in Australia (particularly temporary migrant workers) still exists, notwithstanding improvements in recent times. The COVID-19 pandemic has significantly impacted the availability of labour typically involved in the harvest of Australian horticultural crops, such as people who are on working holiday visas and overseas workers. In light of the reduced availability of such labour sources, we are aware there is an increase in potential undocumented labour and/or the potential for excessive work hours by existing workers. In future periods, we will expand our audit program to the multiple layers of supply chain for our Australian Extra Virgin Olive Oil product, Squeaky Gate.



GREEN COFFEE BEANS

We will continue work with our Tier 1 suppliers to develop processes that will allow greater visibility of modern slavery risks at the point of coffee bean harvest.



SEAFOOD IN INDONESIA

Given the risks identified with procuring seafood from Indonesia, we intend to review our Indonesian supplier in greater detail, including conducting in person visits, to determine the need for any additional audit requirements and to gain greater knowledge of detail and transparency of our secondary tier suppliers.

10 Approval

PRINCIPAL GOVERNING BODY APPROVAL

This statement has been made on behalf of Corval Group Pty Ltd, as trustee for the Corval No.2 Trust, the Modern Slavery Statement reporting entity, and several other entities that it owns and controls.

All entities adhere to the common set of governance policies and programs. A process of consultation across Corval Group and its reporting entities helped to guide the drafting of this statement. This included engagement with the Executive leadership team, the Senior Managers of each of the reporting entities and the People and Culture team.

This Modern Slavery Statement was approved by the Board of Directors of Corval Group in their capacity as principal governing body of Corval Group Pty Ltd, ATF Corval No.2 Trust, as defined by the Act on 15 September 2022.

SIGNATURE OF RESPONSIBLE MEMBER

This Modern Slavery Statement was signed by a responsible member of the Board of the Directors of the Corval Group Pty Ltd, ATF Corval No.2 Trust, as defined by the Section 4 of the Act.



David Valmorbida
Executive Chairman

Corval Group Pty Ltd, ATF Corval No.2 Trust

11 Meeting Requirements of the Act

Below table outlines how Corval Group has met the requirements of the section 13 of the Act.

Modern Slavery Act mandatory reporting criteria	Covered in	Page
Identify the reporting entity.	Section 2	1
Describe the reporting entity's structure, operations and supply chains.	Section 3	2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Section 4	5
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks.	Section 5	15
Describe the reporting entity's remediation processes and how the reporting entity assesses the effectiveness of these actions.	Section 6 & Section 7	24, 25
Any other information that the reporting entity, or the entity giving the statement, considers relevant	Section 8	26
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	Section 5 & Section 10	15, 29

