



# MODERN SLAVERY STATEMENT

2024



FOR THE GREATER GOODNESS



At Harris Farm Markets, we acknowledge the Traditional Custodians of the lands on which we grow, gather, and trade. We pay our respects to Elders past and present recognising their deep connection to this land and its bounty.

As we bring fresh, local produce to our communities, we honour the enduring knowledge and care that Aboriginal and Torres Strait Islander peoples have shared with this country for thousands of years. We are committed to walking together, respecting and protecting this shared heritage that sustains us all.

ABOUT THIS STATEMENT

This is a Modern Slavery Statement for the financial year ended 30 June 2024 (“Statement”). This statement is prepared for A.C.N 003 933 300 Pty Ltd herein references to “Harris Farm Markets”, “Harris Farm”, “Group”, “us”, “we”, or “our” in this Statement are references to A.C.N 003 933 300 Pty Ltd and each of our associated business units unless specified otherwise.

Harris Farm Markets registered office is located at Sydney Markets, Warehouse W Parramatta Rd, Homebush NSW 2140.

CONSULTATION

In preparing this Statement, the Group Head of Sustainability for Harris Farm and the Group Head of Risk actively engaged and consulted with the relevant business units which form part of the Group. This was undertaken by (i) collaborating with the relevant business units and board to provide an overview of the Modern Slavery Act 2018’s reporting requirements, (ii) providing information regarding the actions we intend to take to address these requirements including relevant updates, and (iii) seeking feedback from relevant business units and the board with respect to modern slavery matters. This report is the consolidation of the outputs from those efforts.

HARRIS FARM MARKETS WHISTLEBLOWER HOTLINE

Harris Farm Markets upholds high standards of conduct and welcomes feedback from affected parties to improve our due diligence practices within our operations and supply chains. If you have concerns about modern slavery, potential human rights issues, or unethical behaviour in our operations or supply chain, we strongly encourage you to contact us. Your input is valued, and your right to anonymity protected. Any person may make a disclosure on any Improper Conduct that concerns the Group using the link below or by phone to lodge your report with our third-party provider.

[www.harrisfarmwhistleblower.deloitte.com.au](http://www.harrisfarmwhistleblower.deloitte.com.au)

Call: 1800 954 524 (toll free)

TABLE OF CONTENTS



<b>INTRODUCTION</b> CO-CEO Message Our Highlights for FY24	<b>04</b>
<b>1. ABOUT HARRIS FARM MARKETS</b> Our Story & Values	<b>06</b>
<b>2. OUR SUPPLY CHAIN</b> Our Trade Supply Chain Non-Trade Our Concession Partners	<b>10</b>
<b>3. UNDERSTANDING &amp; ADDRESSING OUR RISKS</b> Assessing our Risk Our Priority Risk Areas Strategy & Governance Our Policies Building our Capability & Awareness Our Partnerships	<b>13</b>
<b>4. MEASURING EFFECTIVENESS</b> Measuring Effectiveness	<b>19</b>
<b>5. NEXT STEPS</b> Our Future Roadmap	<b>20</b>





# INTRODUCTION

## CO-CEO MESSAGE

“

At Harris Farm Markets (Harris Farm), we believe that nature’s abundance is both a gift and a responsibility. As a family-owned business, our commitment goes beyond simply offering fresh food; it’s about enriching lives, supporting communities, and ensuring that the people who bring food to our table are treated with fairness and respect at every stage in the supply chain.

For the greater goodness is more than our motto—it’s our guiding principle, inspiring us to be accountable in every aspect of our operations. Our community is bigger than it was in 1971! The way we give back has grown with it, from ensuring we are giving a fair go to those who grow through initiatives like Imperfect Picks and Farmer Friendly Milk to our Neighbourhood Goodness program, supporting local communities and giving back to the areas we serve, we’re dedicated to making a positive impact right across our supply chain. Just as we follow nature’s rhythms to bring our customers the best quality produce, we are equally committed to protecting the rights and dignity of everyone who plays a part in bringing this produce to life.

This year, Harris Farm advanced on its commitment to addressing modern slavery risks through key initiatives and strategic updates. The board reviewed our controls and identified steps to strengthen anti-modern slavery practices. A new online training module educated 94% of our workforce on modern slavery indicators and reporting channels, while a refreshed sustainability strategy for 2025–2028 prioritised Human Rights and Ethical Supply Chain as a material theme. Collaborations with buying teams, external consultants, and key concession holders have further enhanced our risk management framework and responsible sourcing efforts.

Our journey to address and prevent modern slavery reflects our dedication to doing good by people. We believe in building trust and transparency and are continuously taking steps to ensure that freedom and fairness are at the heart of everything we do. This statement marks an important step on that journey, and we are committed to creating positive, lasting change for all.

Together, we can honour both nature’s generosity and the humanity that sustains it.



*Angus Harris*

Angus Harris  
Co-CEO

*Luke Harris*

Luke Harris  
Co-CEO

## HIGHLIGHTS FOR 2024

### CONTINUOUS IMPROVEMENT

Following a review of current controls and insights gathered during the drafting of this statement, the board was updated on Harris Farm’s potential to reduce exposure to modern slavery risks in the supply chain. This informed the necessary steps to improve processes and procedures for promoting anti-modern slavery practices.

### EMPLOYEE TRAINING AND AWARENESS

Harris Farm introduced an online training module to educate our workforce on modern slavery, our commitment to eliminating it from the supply chain, and the available channels for raising concerns. This year, 94% of employees completed the training.

### SUSTAINABILITY STRATEGY UPDATE

With the appointment of a new Head of Sustainability, Harris Farm reviewed and updated our sustainability strategy through benchmarking and materiality assessments, forming a new strategic plan for 2025–2028. The “Good for Our Family” pillar now highlights Human Rights & Ethical Supply Chain as a key focus for the next three years.

### ENGAGEMENT WITH BUYING TEAMS

During the review of our sustainability strategy, our buying teams worked together to identify high-risk commodities and assess current risk controls. These discussions affirmed the focus on critical commodities and highlighted the need for enhanced controls to strengthen our responsible sourcing strategy.

### INITIAL SUPPLIER ENGAGEMENT

Conducted an initial supplier survey to understand where suppliers are at on their ESG journey. This included specific questions dedicated to human rights & modern slavery.

### ENHANCED RISK MANAGEMENT FRAMEWORK

This year, Harris Farm partnered with external consultant, Victual, to strengthen our Risk Management Framework, including a renewed focus on human rights and modern slavery risks. Through this collaboration, we’ve implemented initiatives to enhance our governance and risk controls to be proactive in preventing potential risks.

### CONVERSATIONS WITH KEY CONCESSION HOLDERS

We engaged key concession store holders (Fish in the Family) on modern slavery in global seafood supply chains, identifying high-risk regions as per the Global Slavery Index and planning to align our due diligence approach moving forward.



## CASE STUDY

### NEIGHBOURHOOD GOODNESS

This year Harris Farm has redefined what community impact means to us by launching our new **Neighbourhood Goodness** strategy. Neighbourhood Goodness takes a more equitable approach to giving across our store communities within key impact pillars that matter most to us.

Rooted in Harris Farm’s long-standing history of generosity, Neighbourhood Goodness is designed to uplift, empower, and bring people together through targeted, grassroots funding.

We support four key pillars through this programme:

**HEALTHY & ACTIVE LIFESTYLES** Encouraging well-being through sports events and local activities that promote health and active participation across all ages.

**COMMUNITY UPLIFT** Supporting those in need and contributing to initiatives that foster inclusivity and empowerment for disadvantaged groups within our communities.

**FOOD SECURITY** Partnering with organisations to address hunger and ensure everyone has access to nutritious food through local food support programmes.

**CELEBRATING CULTURE** Bringing communities together by funding events that celebrate diversity, culture, and heritage, fostering a sense of pride and understanding.





# 1. ABOUT HARRIS FARM MARKETS

## OUR STORY

Since David and Cathy opened their first fruit stall in 1971, Harris Farm Markets has been driven by a commitment to something greater than just selling fresh food: we're inspired by nature itself and the remarkable impact it has on our families, communities, and customers.

We are 100% family-owned and founded on the belief that nature brings people together, nourishes our bodies, and supports local farmers—a philosophy that has led us to grow to 30 stores across NSW, QLD and ACT, with over 3,000 dedicated employees.

In this spirit, we're committed to operating for the greater goodness, ensuring we extend this ethos of responsibility to the people impacted by our business. At the heart of our modern slavery statement is a dedication to Good for Our Family—the social pillar of our sustainability strategy—which means treating every individual with respect and upholding fair and ethical practices across our supply chain.

By committing to doing good by people, we aim to foster an environment where our employees, suppliers, customers, growers and communities thrive, free from exploitation, and uplifted by our shared values.

## FOR THE GREATER GOODNESS

**OUR PRINCIPLES:** The four things we believe in, that guide us everyday



## MANTRA

### FOR THE GREATER GOODNESS

Celebrating good food & all the good things it does for people. Sharing nature's goodness and always acting with goodness.

## OUR PURPOSE

### TO RECONNECT US ALL TO THE NATURAL JOY OF FOOD

To bring us all closer to the natural joy of food.  
To have us shop with heads up not heads down.  
To throw away the list and shop with your eyes.  
To truly appreciate nature's seasons and creations.  
And to collectively get behind the positive impact that good food can make to us all.

FOR THE GREATER GOODNESS

## OUR WAY

### BEING MORE MARKET THAN SUPERMARKET

To always act more market than supermarket.  
A pleasure not a chore. An experience of positivity, not just one of necessity. Fresh food direct from the source in hours not weeks.





OUR STRUCTURE

Founded in 1971, Harris Farm Markets is one of Australia’s most loved fresh food retailers. Still 100% family owned, Harris Farm Markets comprises of Retail, Ecommerce and B2B entities, that helps us deliver goodness to our communities everyday.

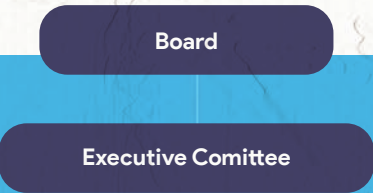


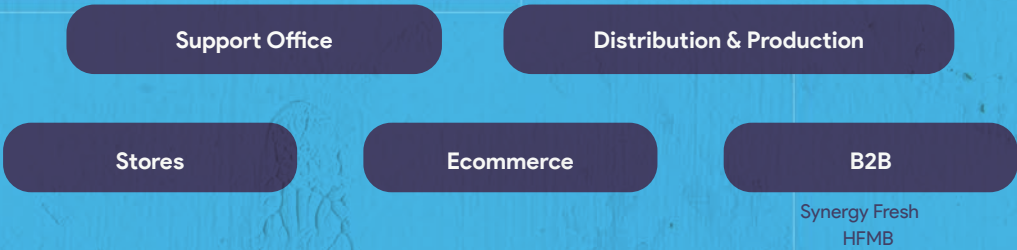
Figure 1: Our Structure

OUR BOARD & EXECUTIVE COMMITTEE

Our board supported by our executive committee oversee the running of all Harris Farm subsidiaries.

SUPPORT OFFICE

Our business is supported by team members working in support functions out of our offices in NSW, QLD and a small remote function in the Philippines.



DISTRIBUTION & PRODUCTION

We operate three distribution centres that supply our store network each day; two in NSW, and one in QLD. We also operate small in-house production facilities within our NSW distribution centres to provide products such as fresh juice, cut fruit & vegetables, cheese and flavoured yoghurt to our stores.

OUR STORES

More than just a grocery store, we operate 30 sites across Sydney, Brisbane, Canberra and in key regional areas like Newcastle, Orange, Bathurst, and Albury. Our presence makes us an integral part of the communities we serve as we reconnect Aussies with the natural joy of food.

Many of our stores are also home to our concession partners such as Fish in the Family, and a number of other small, local businesses that we’ve partnered with to help us bring the best that nature has to offer to our customers each day.

ECOMMERCE

Our stores are responsible for picking and packing any online orders, which are delivered by our delivery partner, Uber.

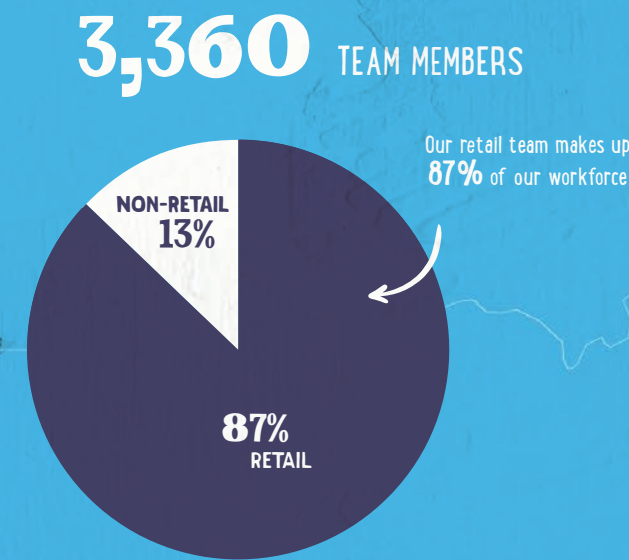
BUSINESS TO BUSINESSES

Harris Farm also provides wholesale fruit and vegetable produce to several small, independent food retailers. These are located largely in NSW. Harris Farm also operates a stall within the Sydney markets selling fresh produce to market customers.



OUR TEAM

Our team is the backbone of our success. Harris Farm is home to a diverse and dynamic workforce of over 3000 team members across our head office, stores, warehouses, and a small team based in the Philippines, committed to fostering an inclusive environment where everyone has a role to play. Our employment structure is a blend of permanent full-time, part-time, casual, and fixed-term positions, ensuring flexibility and growth for all our team members. Our day-to-day operations are also supported by 34 contractors supplying services such as cleaning, trolley collection and security services. We believe that our strength lies in our differences, and our diversity is what enables us to continue providing exceptional service to our customers.



OUR OPERATIONS



Figure 2: Our Operational Activity





## 2. OUR SUPPLY CHAIN

Harris Farm operates a complex global supply chain with over 1000 suppliers across both trade and non-trade supply chains. The core of our business is fresh fruits and vegetables, which we source from over 200 Aussie farmers and wholesalers. We source our grocery, protein, and dairy products locally and globally, from a wide range of direct suppliers and distributors.

Beyond our store supply chains, we rely on over 1000 suppliers for critical operational services including delivery and transport, maintenance and repairs, construction, office supplies, marketing and signage, utilities, cleaning, security, and uniforms.

### PRODUCTS WE SELL

Harris Farm sells a range of product categories including fruit and vegetables, grocery, perishables, fresh flowers, proteins, bakery goods and liquor. The biggest category of goods we sell is fruit and vegetables. We are proud that 87% of our products are sourced from within Australia with 13% being imported ensuring we provide a wide selection of premium gourmet products.



TOTAL SPEND  
COUNTRY OF ORIGIN

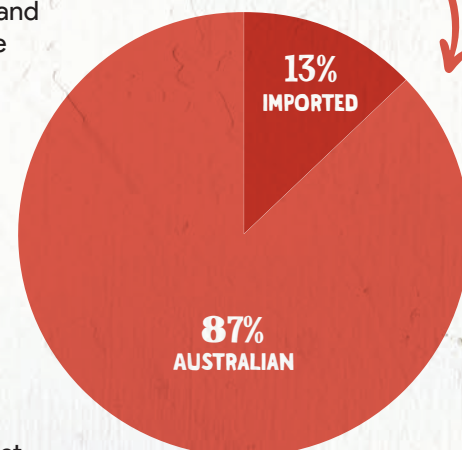


Figure 3: Country of Origin for the Products we Sell

### FRUIT, VEG & FLOWERS

Harris Farm is committed to transparency and integrity in our fresh produce supply chain. Around 97% of our fruit and vegetables are Australian-grown, with imports limited to seasonal or supply gaps. By prioritising local sourcing, we build strong, enduring relationships with aussie growers, cooperatives, and wholesalers nationwide.

Our Fresh Team handpicks produce daily at markets to ensure consistent quality and freshness. We champion fair practices with growers, embracing a total-crop solution to minimise waste and maximise returns for farmers. Regular farm visits deepen our understanding of operations and strengthen partnerships with producers who share our values.

Through ethical and transparent practices, Harris Farm upholds the highest standards of social responsibility in fresh produce.



### OUR FRESH SUPPLY CHAIN



Figure 4: Our Fresh Supply Chain

### GROCERY PRODUCTS

Harris Farm currently has over 8000 products across our grocery, liquor, and household goods categories, and 1000+ direct suppliers and distributors. We prioritise locally sourced groceries from Australia and other non-food items sold in our stores focused on supporting social enterprises and small-medium businesses wherever possible. In these cases, we have a direct relationship with the suppliers who produce these products. Many of our non-perishable groceries and non-food products are imported and purchased through distributors to ensure we have a wide range of premium products. We recognise the inherent complexity of these supply chains, and the challenge of not having direct relationships with producers and manufacturers.

### HARRIS FARM BRAND PRODUCTS

Harris Farm engages a number of third-party vendors to manufacture and supply Harris Farm-branded private label products for purchase in our bricks-and-mortar and online stores. Harris Farm juice, yoghurt and cut vegetables are manufactured in-house from over 90% Australian ingredients. For Harris Farm-branded products that are not produced in-house, we partner with trusted manufacturers who source the majority of their ingredients locally.

### PERISHABLES

Our perishables category includes dairy, dips & antipasto and ready to eat. For this category we prioritise working closely with Aussie producers, including small artisan producers. The majority of dairy products including milk, yoghurt, butter, and ice cream sold in our stores are produced in Australia, with a small amount sourced globally to provide a premium selection for our customers.

### PROTEINS

All Harris Farm fresh meat is produced in Australia, and we have close relationships with our producers and processing facilities. A small percentage of pre-packed meats including smallgoods and fish products sourced globally.

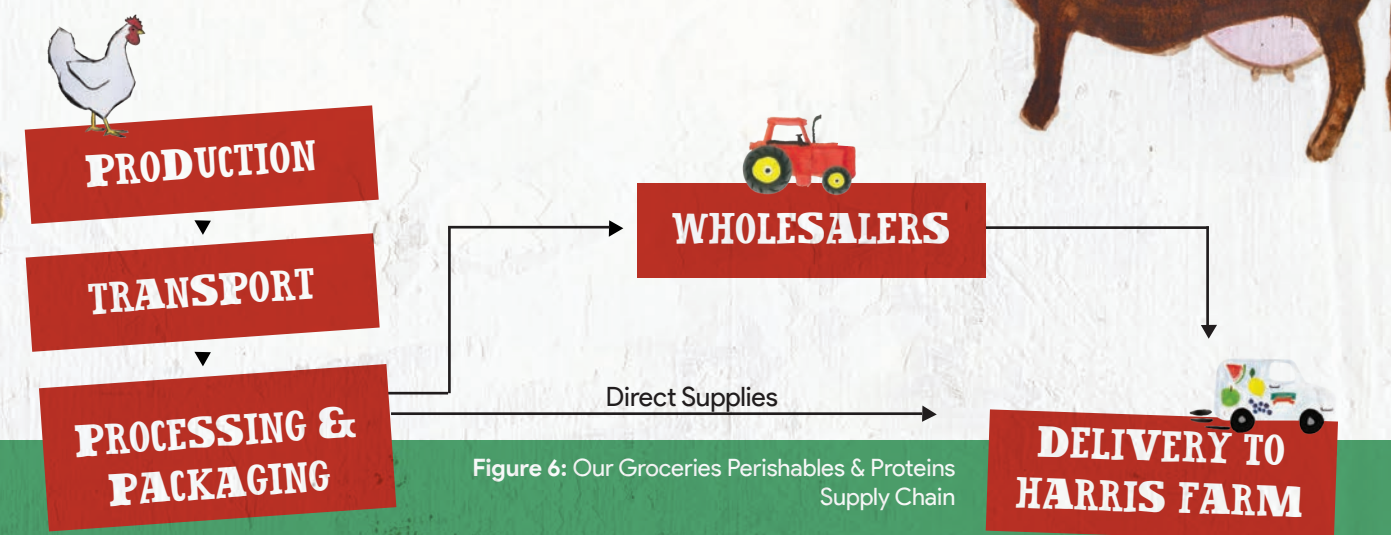


Figure 6: Our Groceries Perishables & Proteins Supply Chain

### NON-TRADE

Non-trade and goods not for resale products and services are critical to our daily operations and store support functions. Harris Farm has over 1000 non-trade vendors who supply resources, goods and services that support our remaining operations including: IT software and hardware, building materials and construction services, transport and storage services, packaging and Personal, Protective Equipment consumables, cleaning services and supplies and marketing materials.

This supply chain is very long, opaque, and complex, and Harris Farm has limited visibility of the supply chain beyond the direct suppliers we work closely with.



CONCESSION STORES

At Harris Farm we proudly partner with concession businesses that reflect our values, like Infinity Bakery, Fish in the Family, and Salumi Australia. These partners share our commitment to providing high-quality, responsibly sourced products.

Each concession store is responsible for its own sourcing and supply chains.

As part of our approach to addressing modern slavery, we are actively engaging in conversations with our concession partners to raise awareness of modern slavery risks and encourage alignment with our standards. By fostering these discussions, we aim to build greater transparency and accountability across our broader network, ensuring that together we contribute to ethical and sustainable practices.

OUR CONCESSION PARTNERS

PARTNERING FOR RESPONSIBLE SOURCING

CASE STUDY



At Harris Farm, we prioritise partnerships with concession stores that reflect our values and offer high-quality, responsibly sourced products. Since welcoming **Fish in the Family** to our Potts Point store in 2008, we've cultivated a strong relationship built on trust, shared dedication to quality, and a commitment to best practices. Over the past 16 years, this partnership has flourished, with Fish in the Family now proudly present in many of our stores.

Understanding that fish is a high-risk commodity for modern slavery, we have started to take steps this year to address these challenges in collaboration with Fish in the Family. Together, we are identifying high-risk regions for fisheries and assessing our supply chains to mitigate any exposure to modern slavery.

By adopting a collaborative approach, we not only address risks but also empower our concession partners to strengthen their own capabilities in identifying and managing these critical issues. This shared commitment ensures we uphold ethical standards across every aspect of our business.



3. UNDERSTANDING & ADDRESSING OUR RISKS

ASSESSING OUR BUSINESS RISKS

Harris Farm considers the risk of modern slavery within its direct workforce to be low.

As part of our commitment to identifying and mitigating modern slavery risks, we conducted an Operations Risk Assessment across our operations. This assessment, performed as a desktop review, was informed by publicly available resources, including the Global Slavery Index.

Our diverse direct workforce comprises permanent full-time, part-time, casual, and fixed-term positions across head office, stores, and warehouses. All employees are covered by comprehensive entitlements, including above-award wages, superannuation, leave benefits, and access to formal grievance mechanisms. Staff are explained their entitlements and details of our employee assistance program during employee onboarding.

While the overall risk of modern slavery in our workforce is minimal, we recognise that low risk does not mean no risk. Specific risk factors include employees on temporary entrant and student visas and those in roles that may not require proficiency in English, such as trolley collection and certain warehouse positions. To address these vulnerabilities, we proactively ensure that these employees understand their rights and have access to our employee assistance programs through targeted support from our store teams.

Based on this assessment, we conclude that the risk of modern slavery within our direct workforce is minimal. Subcontracted roles, such as cleaning and security services, are included within the scope of our broader supply chain risk assessment detailed below.

THE UNITED NATIONS 'GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS SET OUT A THREE-PART CONTINUUM OF INVOLVEMENT THAT OUTLINES HOW BUSINESSES CAN BE INVOLVED IN ADVERSE HUMAN RIGHTS IMPACTS, INCLUDING MODERN SLAVERY.

CAUSE

A business may cause modern slavery or other human rights harm where its actions directly result in modern slavery occurring.

CONTRIBUTE

A business may contribute to modern slavery or other human rights harm where its actions or omissions facilitate or incentivise modern slavery.

DIRECTLY LINKED

A business may be directly linked to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in businesses' extended supply chain.

ASSESSING OUR SUPPLY CHAIN RISKS

In FY20, Harris Farm undertook an assessment of modern slavery risks within our direct operations and supply chains, focusing on spend-based risk using a life cycle assessment (LCA) methodology. This assessment utilised internationally recognised sources, specifically the Social Hotspot Database and an extensive literature library, to examine potential human rights risks across various stages of our supply chain.

The assessment reviewed risk factors across critical lifecycle stages of our procurement, including:

- Raw material extraction
- Processing
- Manufacturing
- Transportation
- Packaging
- Product or service delivery
- Disposal

This analysis helped us to identify areas within our operations and supply chains that may present a high inherent risk of modern slavery or other human rights issues, with attention to industry and geographical contexts. Each category was evaluated for risk impact and likelihood within our supply chain. This approach was in alignment with the Australian Government's recommended framework, adhering to the United Nations Guiding Principles on Business and Human Rights (UNGPs) to evaluate our modern slavery risk. We used this methodology to understand and prioritise potential risks and to define a structured response for any identified harms.

Our risk assessment highlighted key areas in our supply chain with significant human rights implications, while also identifying opportunities to address risks across lower-risk areas. We conducted an opportunity workshop that helped us explore our leverage across different supply chains and identify those with the most potential for impact.

We prioritised opportunities based on factors such as:

- High-spend categories and suppliers directly associated with risk
- Suppliers closer to us within our supply chain

Acknowledging our limited influence on larger and more distant suppliers, we reflected on the feasibility and impact of potential interventions. This prioritisation process enabled us to focus on the most critical risk areas.



OUR PRIORITY RISK AREAS

	RISK LIKELIHOOD	RELATIONSHIP TO RISK	KEY RISK FACTORS
FRUIT & VEG	Very High	<b>Contribute:</b> Through sourcing practices. Harris Farm may rely on suppliers who use subcontracted or unregulated labour. <b>Directly linked:</b> To labour exploitation in farms or packing facilities.	<ul style="list-style-type: none"><li>- High reliance on seasonal and migrant labour in Australia</li><li>- Payment below minimum wage, debt bondage through Recruitment fees.</li><li>- Poor working conditions, excessive hours.</li></ul>
RICE	Very High	<b>Directly linked:</b> To forced labour in cultivation or milling stages.	<ul style="list-style-type: none"><li>- Cultivation often relies on smallholder farmers in high-risk regions (e.g., Southeast Asia).</li><li>- Use of child labour, debt bondage, or forced labour.</li><li>- Lack of worker protections in informal economies.</li></ul>
NUTS	Very High	<b>Directly Linked:</b> Harris Farm is linked through third-party suppliers to risks in processing, manufacturing, or raw material sourcing.	<ul style="list-style-type: none"><li>- Harvesting processes, especially in regions like West Africa and South Asia, linked to child labour and trafficking.</li><li>- Lack of traceability in the supply chain.</li><li>- High manual labour demands during harvest.</li></ul>
OTHER GROCERIES	Very High	<b>Contribute:</b> Through reliance on suppliers without robust labour controls. <b>Directly Linked:</b> To labour exploitation in processing facilities or farms.	<ul style="list-style-type: none"><li>- Risks include forced labour in production of sugar, cocoa, and processed goods.</li><li>- Exploitation in Tier 2/3 suppliers due to poor oversight.</li><li>- High-risk sourcing regions like West Africa and Southeast Asia.</li></ul>
BEEF	High	<b>Contribute:</b> Through reliance on suppliers without robust labour controls. <b>Directly Linked:</b> To labour exploitation in processing facilities or farms.	<ul style="list-style-type: none"><li>- Risks in meatpacking plants (e.g., underpayment, excessive working hours).</li><li>- Migrant labour exploitation in cattle production (e.g., Australia).</li><li>- Limited visibility into Tier 2 suppliers for feed or farming inputs.</li></ul>

Table 1: Our Priority Risk Areas

ORGANISATIONAL STRATEGY

Our approach to human rights in our operations and supply chain is informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs), our sustainability manifesto and risk management framework. Our governance structures, including the Board and executive leadership, continue to play a crucial role in overseeing and implementing our Human Rights Policy.

The Head of Sustainability role, formed in recent years, has been key in integrating our human rights agenda into our broader sustainability goals. Our refreshed 2025-2028 Sustainability Strategy now includes Modern Slavery as part of the overall sustainability framework, with a key theme as a part of this strategy now including “human rights & ethical value chain”. Within this, a core element of our approach to managing modern slavery risk, is ensuring our team have a clear understanding of the role they play in our modern slavery risk management systems. Every Harris Farm team member has a role in managing modern slavery risks, though their responsibilities may differ depending on their position. Ultimately, accountability for modern slavery risk management begins at the Board level.

CASE STUDY

UPDATING OUR SUSTAINABILITY MANIFESTO

In 2024, Harris Farm undertook a comprehensive materiality assessment to update our **Sustainability Manifesto**. The renewed Manifesto reinforces our focus on three core pillars: Good for Our Earth, Good for Our Family, and Good for Our Business, setting ambitious goals and targets for the next three years.

Our social pillar, Good for Our Family, focuses on improving outcomes for employees, customers, growers, and everyone in our supply chain, with a core commitment to upholding human rights. This includes ensuring fair treatment, respect, and meaningful action to eliminate exploitation.

The Manifesto highlights the importance of understanding and addressing the social and environmental impacts of our supply chain. By refining our sourcing policies, Harris Farm strives to achieve better outcomes for people and the planet.

To ensure accountability, we conduct an annual review of our sustainability strategy, allowing us to adapt to emerging challenges and uphold high standards of fairness, human rights, and environmental care. These efforts reinforce Harris Farm’s leadership in sustainable and ethical business practices.



OUR GOVERNANCE

Core to our approach is ensuring our team have a clear understanding of the role they play in our modern slavery risk management systems. All staff have a role to play with respect to modern slavery risk management, but their accountabilities vary by role. Accountability for modern slavery risk management starts with the Board.

OWNERS & BOARD	Board & Shareholders Maintain oversight of human rights (including risks related to modern slavery) across our operations and business processes			
EXECUTIVE & STEERING COMMITTEES	Executive Accountable for the implementation of our human rights programme		Risk & Sustainability Committees Responsible for oversight of Harris Farm's response to human rights and provides guidance to the board	
INDUSTRY EXPERTS	Harris Farm engages third party consultants to advise on modern slavery risk & risk management			
BUSINESS FUNCTIONS	Sustainability Promotes information exchange across the group on implementation of sustainability-linked goals, including modern slavery	Health, Safety & Risk Responsible for ensuring compliance with relevant laws and regulations related to modern slavery; both domestically and internationally	People & Culture Accountable for ensuring employees are subject to relevant awards and industrial instruments	Category Buyers Accountable for the identification and response to modern slavery risks within our trade supply chains
	Finance Accountable for the onboarding of new suppliers, ensuring modern slavery compliance		Line Management Accountable for the identification and response to modern slavery risks within their departments	
OPERATIONAL STAFF	Responsible for the identification of modern slavery risks within our operations and supply chains, consistent with our company values			

Table 2: Our Governance Framework



OUR POLICIES

Maintaining and meaningfully implementing effective policies around issues such as modern slavery is a key part of meeting our commitment to more sustainable and ethical leadership. Our key policies are summarised below.

POLICY	RELEVANCE TO MODERN SLAVERY
HUMAN RIGHTS POLICY	The purpose of this policy is to outline the fundamental elements of Harris Farm’s approach to human rights; and how Harris Farm demonstrates its commitment to respecting human rights in line with the Universal Declaration of Human Rights and other international frameworks.
GRIEVANCE RESOLUTION POLICY	The intent of this policy is to provide a process for the appropriate and effective resolution of grievances. Everyone is entitled to fair treatment under these procedures.
WHISTLEBLOWER POLICY	The Whistleblower Policy ensures employees and other workers can raise concerns about serious wrongdoing, including unethical, illegal, corrupt, or inappropriate conduct, without fear of victimisation, harassment, or discrimination. This Policy applies to: Employees, Directors, Officers (including employees of contractors), Suppliers, Consultants. Family members of all entities within the Harris Farm Markets Group (“Workers”)
CODE OF CONDUCT	This policy provides guidance as to the ways Harris Farm expects all employees and contractors to behave at work and when representing the company.
SUPPLIER AGREEMENT	This Supplier Agreement outlines the key commercial terms under which the supplier will supply the products or goods to Harris Farm. This includes compliance to all relevant laws including Modern Slavery Act.
ANTI-BULLYING, HARASSMENT & DISCRIMINATION POLICY	This policy promotes a workplace that respects individual dignity and safeguards against abuse or mistreatment.
DIVERSITY & INCLUSION POLICY	At Harris Farm we employ a diverse range of people from different backgrounds and with different points of view. We aim to build a culture and environment in which these differences are respected and valued. An inclusive culture which expects and rewards behaviours that support all our people to reach their full potential.
RISK FRAMEWORK	Identifies and manages modern slavery risks across our operations and supply chains to uphold human rights, ensuring appropriate controls and mitigation strategies.
SUPPORT WORKER POLICY	The purpose of this policy is to ensure that support workers are selected, employed, and managed in a manner that aligns with Harris Farm goals, promotes a positive and safe work environment, and maximizes client satisfaction. It aims to provide managers with a framework for consistent and fair practices throughout the employment lifecycle.
WORKPLACE HEALTH & SAFETY PROCEDURES	The aim of this policy is to ensure that employees, contractors, visitors and customers understand what we expect, and what we will do to reduce the risk of an injury occurring; to maintain quality for our customers and to protect the environment.
FINANCIAL HARDSHIP POLICY	Supports fair treatment and access to assistance, reducing the risk of financial exploitation among employees and contractors.

Table 3: Our Policy Framework

BUILDING OUR CAPABILITY & AWARENESS

BASELINE AWARENESS E-LEARNING

This year, Harris Farm introduced a Mandatory Modern Slavery Awareness E-Learning module for all employees as part of our commitment to proactive action and positive change in addressing modern slavery risks.

The module helps employees identify potential modern slavery risk indicators, including how Harris Farm could cause, contribute, or be directly linked to modern slavery through our supply chain relationships.

The training also highlights Harris Farm’s governance framework, including clear escalation and reporting channels for suspected breaches. This ensures any identified concerns are promptly directed to the appropriate team members for investigation and resolution.

By implementing this initiative, we aim to empower our team to recognise and respond to modern slavery risks, reinforcing our commitment to ethical and responsible business practices.

CASE STUDY

94%  
of staff trained in FY24



NEXT STEPS: TARGETED TRAINING PLANS

Going forward, to enhance our team’s ability to identify and respond to modern slavery in critical roles such as our Buying and Property teams, we are planning to develop more comprehensive modern slavery training. The training plans will support buying teams to build on our purchasing practices to improve our risk management practices. We will continuously expand the scope and depth of training to align with the evolving needs of different roles within our governance structure, ensuring we effectively assess and mitigate modern slavery risks.

OUR PARTNERSHIPS

To effectively address and mitigate modern slavery risks, we partner with a number of organisations.

Collectively these efforts increase our capability and enable Harris Farm to contribute to the development of more ethical business practices.

OUR ENGAGEMENT

AUSTRALIAN RETAILERS ASSOCIATION	Harris Farm collaborates with the Australian Retailers Association to share insights, resources, and best practices for addressing modern slavery risks within the retail sector and supply chains.
EDGE IMPACT	Edge Impact provides trusted professional advice to Harris Farm in relation to our modern slavery strategy. Edge Impact performed our original Social Life-Cycle Assessment (S-LCA) risk assessment and has assisted in the drafting of this modern slavery statement.
FAIR WORK	Harris Farm engages with Fair Work to ensure compliance with workplace regulations, promote fair labour practices, and address potential risks related to modern slavery in employment.
VICTUAL	Engaged to advise on approach to organisational risk management & update risk matrix in FY24 and ongoing. This included a renewed focus on human rights and modern slavery, updating the risk ownership and mitigation controls.

Table 4: Our Partnerships Regarding Modern Slavery





OUR GRIEVANCE & REMEDIATION APPROACH

Harris Farm upholds high standards of ethical conduct and is committed to fostering a culture that encourages feedback from all stakeholders, including team members, suppliers, and affected communities. We understand that raising concerns can be challenging, so we have developed accessible grievance mechanisms that empower individuals to voice concerns about modern slavery, human rights issues, or unethical behaviour confidently and securely.

Harris Farm ensures that grievances are handled with care and provides support to those raising concerns by:

- Protecting anonymity where requested;
- Treating individuals fairly and respectfully throughout the grievance process;
- Ensuring access to remedies when harm is identified; and
- Protecting against retaliation for raising concerns



KEY ELEMENTS OF OUR APPROACH

GRIEVANCE SYSTEM

Purpose, audience, and access: Our internal grievance system enables all Harris Farm employees, contractors, and on-site partners to raise concerns confidentially. Concerns can be reported directly to their immediate supervisor, the HR team, or through a dedicated grievance email channel. This system ensures timely, confidential resolution within the business.

WHISTLEBLOWER SYSTEM

Purpose, audience, and access: Our whistleblower system allows employees, contractors, suppliers, and their workers to report genuine concerns about misconduct, unethical behaviour, or suspected modern slavery without fear of reprisal. This system is available via an anonymous link on our internal portal for employees. External stakeholders, such as suppliers or concession partners, can access the system through a secure contact form on our website or by reaching out to the designated whistleblowing officer.

TRAINING AND AWARENESS

We ensure all employees and relevant stakeholders receive training on our grievance mechanisms and modern slavery policies to foster a culture of transparency and accountability.

CONTINUOUS IMPROVEMENT

Our grievance and remediation processes are reviewed regularly to ensure alignment with best practices and evolving legal standards. This reflects our commitment to identifying and addressing risks of modern slavery effectively and proactively.

By embedding robust grievance and remediation mechanisms into our governance framework, Harris Farm aims to ensure that any concerns are addressed promptly and that we uphold our values of fairness, integrity, and respect for human rights.

4. MEASURING EFFECTIVENESS

Harris Farm evaluates the effectiveness of its actions to address modern slavery risks by setting targeted goals within our sustainability manifesto aligned with its highest-risk areas and regularly monitoring progress against these goals.

COMMITMENT	PROGRESS
COMMIT TO ACHIEVING A 30% INCREASE IN SUPPLIERS AUDITED FOR COMPLIANCE WITH OUR MODERN SLAVERY AND HUMAN RIGHTS POLICIES.	This year, we assessed the effectiveness of our audit process and identified opportunities for improvement. We initiated a supplier survey to gather additional insights, including focused questions on human rights and modern slavery.
AIM TO TRAIN 100% OF OUR WORKFORCE ON MODERN SLAVERY AWARENESS AND RISK FACTORS.	Successfully trained 94.5% of the workforce on modern slavery awareness, aiming to achieve full coverage in the next phase.
PLEDGE TO REDUCE IDENTIFIED RISK FACTORS IN OUR SUPPLY CHAINS BY AN ADDITIONAL 20%.	Conducted a comprehensive review of existing risk factors in FY24 and identified the need for a deeper reassessment of social risks in the future.
REVIEW AND UPDATE OUR HUMAN RIGHTS POLICY TO ENSURE ALIGNMENT WITH CURRENT INTERNATIONAL STANDARDS AND BEST PRACTICES.	Updated the Human Rights Policy in FY24 to align with international best practices, including the United Nations Global Compact (UNGC) principles.
MAINTAIN STRONG BOARD OVERSIGHT AND GOVERNANCE TO ENSURE THE EFFECTIVENESS AND RELEVANCE OF OUR MODERN SLAVERY POLICIES AND STRATEGIES.	Undertook an comprehensive materiality assessment to lift the governance of sustainability related themes. Engaged the board in FY24 with a detailed review of current practices, identified areas for enhancement, and outlined a strategic road-map for FY25.

Table 5: Update on Last Years Commitments





# 5. NEXT STEPS

## OUR FUTURE ROADMAP

At Harris Farm, we know there is still a long road ahead to reduce the potential modern slavery risks within our supply chain. We have identified a broad range of activities that will contribute towards our future Modern Slavery Roadmap.

AREA	FUTURE ACTIONS
RESPONSIBLE SOURCING	<ul style="list-style-type: none"><li>Better understand our supply chains through supplier surveys and engaging our concession partners.</li><li>Conduct an internal responsible sourcing benchmarking.</li><li>Ethical and sustainable sourcing review: develop a responsible sourcing policy and then, develop a due diligence process that can be integrated into the procurement process.</li></ul>
TRAINING & AWARENESS	<ul style="list-style-type: none"><li>Close the gap with non-retail modern slavery awareness training versus retail.</li><li>Conduct buyer-specific training with a refresher workshop on mitigating modern slavery risks through procurement.</li></ul>
COLLABORATION	<ul style="list-style-type: none"><li>Utilise our existing network to identify the effectiveness of the steps we have taken.</li><li>Engage with relevant supply chain to enhance our knowledge and understanding and improve our risk identification.</li></ul>
GOVERNANCE	<ul style="list-style-type: none"><li>Develop a framework for measuring the effectiveness of our actions, including specific metrics and KPIs.</li></ul>

Table 6: Our Future Roadmap



The purpose of this Statement is to provide general information only as required by the Modern Slavery Act and is correct as at the date of publication. Harris Farm Markets are the parent companies of the reporting entities within the Harris Farms Group (including, for the avoidance of doubt, all reporting entities listed in this Statement). This Statement was approved by the Boards of the Harris Farm Markets, being the principal governing bodies of each of the reporting entities respectively.

