



Modern Slavery Statement

14th August 2023

Modern slavery is a crime and a violation of fundamental human rights. It takes many forms including slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Zerella Holdings Pty Ltd (Trust) trades as Zerella Fresh and is the primary entity of the Pye Group of Companies (Non-legal entity). Other entities in the Pye Group are Parilla Premium Potatoes Pty Ltd (private company) and Parilla Transport Pty Ltd (private company).

Zerella Fresh (and the Pye Group as a whole) takes a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships, as well as implementing and enforcing effective systems and controls to ensure modern slavery does not exist anywhere in our own business or in any of our supply chains.

We are also committed to ensuring transparency in our own operations and in our approach to combating modern slavery throughout our supply chains, in accordance with our disclosure obligations under the Modern Slavery Act.

We expect the same high standards from all our contractors, suppliers, and other business partners. We will continue to include specific prohibitions against the use of forced, compulsory, or trafficked labour, as well as anyone held in slavery or servitude, whether adults or children, in our contracting processes, and we expect our suppliers to hold their own suppliers to the same high standards.

This policy applies to all individuals who work for us or on our behalf in any capacity, including directors, managers, employees at all levels, agency workers, agents, contractors, external consultants, third-party representatives, and business partners.

Zerella Fresh is ultimately responsible for ensuring that this policy conforms with our legal and ethical commitments, as well as that all people under our control abide by it.

Zerella Fresh is in charge of implementing this policy on a daily basis, monitoring its usage and effectiveness, dealing with any questions about it, and reviewing internal control systems and processes to ensure they are successful in combating modern slavery.

Management at all levels is responsible for ensuring that people reporting to them understand and comply with this policy, as well as that they get proper and ongoing training on it and the subject of modern slavery in supply chains.

Operations & Supply Chains

Zerella Fresh is a vertically integrated horticulture business focused on the growing and packing of potatoes, carrots & onions.

Despite being heavily vertically integrated, Zerella Fresh is dependent on other companies to supply it with inputs, provide professional advice and services plus assist in getting produce to customers. Zerella Fresh is also a significant employer.



Risks & Controls

Identified Risks	Controls
Internal controls & processes	Maintain independent SEDEX certification against Ethical Trading Initiative (ETI). Maintain PALM scheme accreditation through open participation in audits
Employee recruitment	Employees are to be engaged directly. Exceptions to this (use of labour hire) must be approved in writing by the General Manager
Labour hire	Only accredited /licenced labour hire companies to be used
Child labour	Maintain a policy that prohibits the employment of children under the age of 18
Freedom of association	Maintain a policy that ensures freedom of association. Invite Unions to participate in Collective Bargaining
Freedom of movement	Ensure there are no actual or perceived unlawful restrictions to employees electing to terminate their employment. This includes contracts, the withholding of documents and other imposed financial barriers. No unauthorised payroll deductions. Deduction amounts to be reasonable
Suppliers	An annual letter to be sent to all suppliers (>k\$100 in prior financial year) outlining Zerella Fresh's commitment to the Ethical sourcing and the Modern Slavery Act 2018 and requesting the Suppliers signed commitment to the same
Training	Annual training of all managers in the Pye Group of ETI and the group's Ethical Sourcing Policy and Modern Slavery Statement Annual written communication to all employees of key policies & procedures including Modern Slavery Statement, Ethical sourcing, Child labour and ETI
Identified breaches	Maintain a whistle blower policy & system. Annual communication in writing to all employees detailing the existence and use of this system

This Statement was reviewed and approved in its entirety by all directors in their role as the principal governing body of Zerella Holdings Pty Ltd on 14th August 2023.

Signed



Mark Pye
Managing Director