



2023/24

MODERN SLAVERY STATEMENT



“We pride ourselves on being a business that works closely with our industry network to address the global issue of modern slavery.”

Simplot Australia Pty Ltd , ACN 070 579 609 (“**Simplot Australia**”) is the applicable reporting entity pursuant to the Modern Slavery Act 2018 (Cth). Simplot Australia is a wholly-owned subsidiary of the J.R. Simplot Company, a company registered and headquartered in Boise, Idaho, USA. Simplot’s Australian office registered address is 2 Chifley Drive Mentone, Victoria 3194. As part of its operations, Simplot Australia controls several entities, including Simplot Australia (International) Pty Ltd, a holding company, which in turn owns Simplot New Zealand Limited, a sales and distribution office based in New Zealand.

In this Modern Slavery Statement, the terms “Simplot”, the “Company”, “our business”, “organisation”, “we”, “us”, and “our” refer to Simplot Australia, except where the context otherwise requires.

This Modern Slavery Statement is intended to meet the current and future disclosure requirements of the Modern Slavery Act 2018 (Cth).

This Modern Slavery Statement is made according to the Modern Slavery Act 2018 (Cth) and constitutes the Modern Slavery Statement for Simplot’s Australian business for the foreseeable future, and covers our Financial Year (FY24) the period 1 September 2023 to 31 August 2024 (“**the reporting period**”). Each Simplot entity is covered by Simplot policies, procedures and systems, including those relating to supply chain management, contracting, purchasing and human resources.

Simplot acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures and to Elders, both past, present and emerging.

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A MESSAGE FROM SIMPLOT’S GLOBAL FOOD VICE PRESIDENT APAC

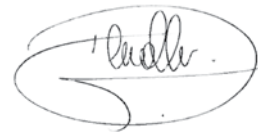
I am pleased to share our fifth Modern Slavery Statement, which outlines the actions and progress throughout the year to address and mitigate modern slavery in our operations and supply chain.

At Simplot, we are committed to conducting business with integrity and ethics, as outlined in our Code of Conduct and guided by our core values. We strive to continually improve our Anti-Modern Slavery Program with a focused effort on the areas that present the greatest risk in our operations and supply chain. The ongoing development and progress of our Anti-Modern Slavery Program continues to be a priority for Simplot Australia. The improvements we have made to our program in the past year include, implementing a pre-screening process for new suppliers and sites, advancing our third-party social compliance audit requests and strengthening our relationships with our industry partners. Building the knowledge of our team members through internal and external industry education sessions has also been a key progress highlight.

Our Program continues to be effective in identifying and addressing Modern Slavery risks. During the reporting period, we took proactive action in response to a supplier-related concern, demonstrating the strength of our approach. As we evolve and refine our Program, we remain focused on aligning with industry best practices and ensuring robust oversight across our operations and supply chain.

We are very proud to work closely with our industry partners and have continued to build our relationships with them, particularly in our seafood sourcing. By sharing knowledge and leveraging their industry expertise, we have implemented new systems to improve the level of due diligence and assurance in our supply chain. We greatly value the experience of our industry network. Collectively we are improving our processes and Program to improve the lives of our global community.

This Statement was approved by the Board of Simplot Australia on 20th March 2025



Darren Tendler
Vice President APAC Global Food

KEY HIGHLIGHTS FOR CURRENT REPORTING PERIOD

Implemented improved due diligence process of pre-screening new sites and suppliers.

Conducted third party SMETA social compliance audits for high-risk seafood suppliers in Asia.

Advanced traceability and assurance capability by working together with our industry partners.

Built internal knowledge of team members in key operational roles through internal and external industry education sessions.



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

In Australia, Simplot is an agricultural and food manufacturing business that creates food Australians and New Zealanders love by maximising value from the best Australian grown produce and global seafood.

We are home to some of Australia's most loved and trusted retail food brands – Birds Eye, Edgell, John West, Leggo's, Raguletto, Five Brothers, I&J, Chicken Tonight, Harvest, Seakist, Ally and Chiko. We are also one of Australia's largest suppliers of foodservice products, and we supply quick service restaurants, cafes, restaurants, stadiums, hospitals, aged care facilities and many other venues. These products range from balanced meals, convenient frozen vegetables, tasty pasta sauces, and nutritious seafood to snack foods.

As a business, we pride ourselves on building long term partnerships with Australian farmers and our supply chain, investing in our people, and building mutually beneficial relationships with our customers.

Simplot's Australian operations are part of the privately-owned J.R. Simplot Company based in Boise, Idaho in the United States. At the end of 2022, Simplot Australia merged its food business with Simplot's international Food Group business to become Simplot Global Food.

We work closely with approximately 2,531 suppliers, of which 2,339 (92%) are based in Australia.

Our Operations

Simplot Australia directly employs around 2,000 people. Many of them working at one of our five manufacturing facilities. Our facilities are located in Echuca in Victoria, Bathurst and Kelso in New South Wales and Devonport and Ulverstone in Tasmania. Additionally, we have two Agricultural Services facilities located to support our New South Wales and Tasmanian vegetable processing operations. We are also proud to work with over 300 Australian growers who supply about 400,000 tonnes of Australian vegetables to our operations each year.

The broader Australian manufacturing and agricultural industry is also supported through our operations, including transportation, distribution, cold store providers, ingredient and packaging suppliers. We work closely with approximately 2,531 suppliers, of which 2,339 (92%) are based in Australia.

Our Supply Chain

Our supply chain is a complex mix of local and overseas suppliers covering numerous product and service categories. In the reporting period, our supplier base consisted of 2,531 suppliers, of which 610 are in scope of our Anti-Modern Slavery Program. Through an evaluation process we determine if suppliers should be assessed under our Program. This evaluation takes into consideration factors such as minimum spend and volume threshold, level of risk, visibility of supply chain, and consistency of supply. Applying these criteria allows us to focus our efforts on where we believe we can make the biggest difference. The categories and numbers of suppliers in scope of the Program are as follows:

Number of Suppliers in Scope of Anti-Modern Slavery Program

DIRECT SUPPLIERS

Direct Suppliers provide us with goods such as ingredients, packaging and raw materials forming a part of our finished product for consumers. For example, the tuna for our John West tuna range.



INDIRECT SUPPLIERS

Indirect Suppliers provide us with goods and services that do not directly form part of our finished goods for consumers. This includes the stationery we use at our offices, or the internet data plans used across our sites.



LOGISTICS SUPPLIERS

Logistics Suppliers provide us with transport modes to move our product around Australia and internationally. This includes trucks, rail and sea freight. For example, sea freight used to transport our products from Tasmania to the Australian mainland.



AGRICULTURAL SUPPLIERS

Agricultural Suppliers provide the agricultural inputs to our manufacturing facilities that become finished goods. For example, the potatoes grown that become our Birds Eye frozen chips.



IDENTIFYING MODERN SLAVERY RISKS

As a large agricultural and food manufacturing business, our operations and supply chain are diverse and complex. We conduct various activities that help us evaluate the areas of greatest risk so we can focus our efforts on identifying and mitigating modern slavery risk. Our risk assessment process includes utilising data from Sedex radar reports, site risk ratings from Sedex, insights from discussions with our industry network, scanning global sources of information such as the US Withhold Release Orders and Findings List and news articles and frequent industry collaboration with our major customers.

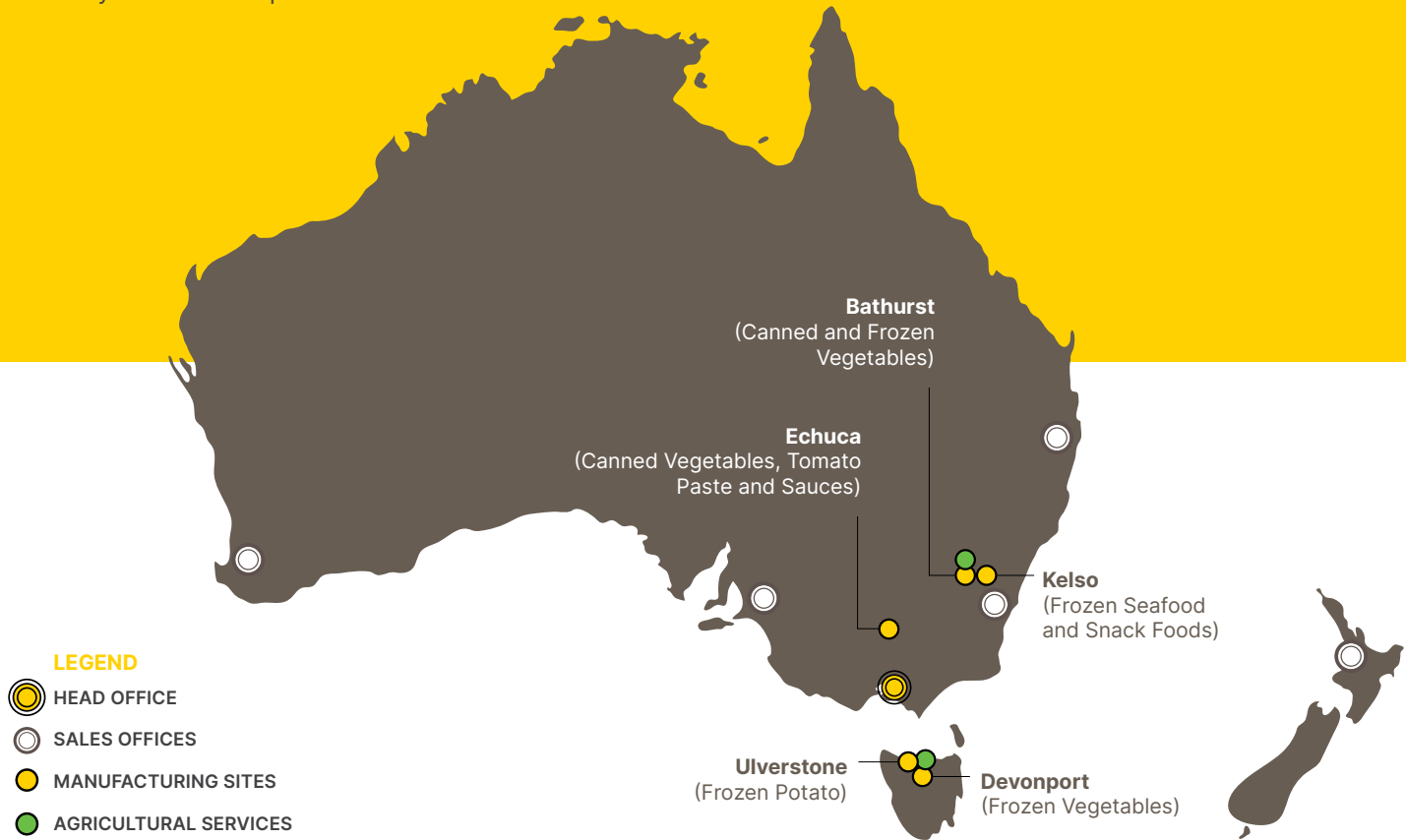
Simplot acknowledges that modern slavery can take many forms including trafficking in persons, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services. The following four types of modern slavery are the most relevant to the categories within the food industry in which we operate:

FORCED LABOUR: Where the victim is either not free to stop working or not free to leave their place of work.

DEBT BONDAGE: Where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.

WORST FORMS OF CHILD LABOUR: Where children are either exploited through slavery or similar practices, including for sexual exploitation, or engaged in hazardous work that may harm their health, safety or morals, or used to produce or traffic drugs.

DECEPTIVE RECRUITING FOR LABOUR OR SERVICES: Situations where the victim is deceived about whether they will be exploited through a type of modern slavery.



OUR ICONIC BRANDS





Identifying Risks within Our Operations

We assess the risk of modern slavery within our own operating locations to be low due to our full operational oversight. This is supported by the majority of our team members being covered by enterprise agreements and employment contracts. The mechanisms for verifying and managing this risk is further detailed on Page 10.

Identifying Risks within Our Supply Chain

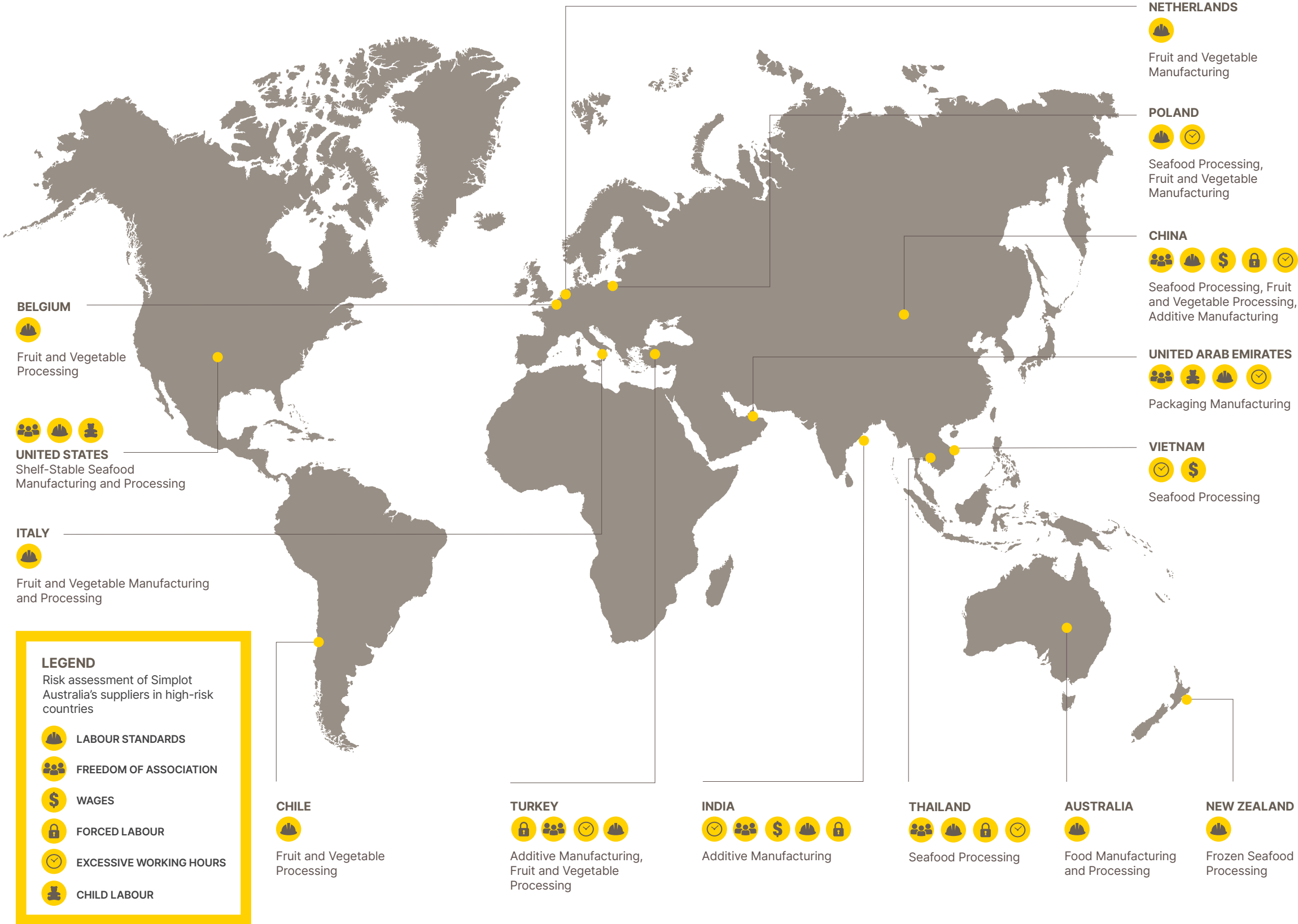
We assess the risk of modern slavery within our supply chain to be higher risk due to less operational oversight. As such, we believe the best process for identifying and mitigating modern slavery risk involves collaboration and partnership with our suppliers, partners, and growers. The mechanisms for verifying and managing this risk is further detailed on Page 10.

AGRICULTURAL SUPPLIERS

We work closely with over 300 Agricultural Suppliers. Our employees collaborate with farmers, frequently visiting farms, and this provides greater visibility of any modern slavery risks that may exist. All of our Agricultural Suppliers have completed the modern slavery risk assessment, using our purpose-built assessment tool. The purpose of the tool is to identify any indicators of modern slavery present in our grower operations and covers areas such as health and safety standards, employment arrangements and methods of pay, and working conditions. To date there have been no instances of modern slavery identified as part of the assessment process. During the reporting period, we engaged with FairTrade Australia New Zealand to explore the concept of collaboratively developing a labour verification standard for our grower operations. The pilot would involve observing operations to establish a framework for identifying potential indicators of modern slavery, with the goal of applying it broadly across our grower network. By leveraging FairTrade's industry expertise we aim to develop a robust indicators that can enhance our existing modern slavery risk assessment tool. We will continue working with FairTrade Australia New Zealand to advance this pilot in the next reporting period.

DIRECT, INDIRECT AND LOGISTICS SUPPLIERS

We continually assess the modern slavery risks within our supply chain by using information from the Sedex platform to identify the countries, sectors and suppliers that represent greater risk. This risk assessment has helped inform our areas of focus to ensure we address the areas where we can have the most impact. During the reporting period, our risk assessments directed our focus to addressing increased risks in seafood sourced from Asia. Our total risk profile is represented in the map:




LEGEND
Risk assessment of Simplot Australia's suppliers in high-risk countries

- LABOUR STANDARDS
- FREEDOM OF ASSOCIATION
- WAGES
- FORCED LABOUR
- EXCESSIVE WORKING HOURS
- CHILD LABOUR

PARTNERSHIPS AND INDUSTRY COLLABORATION

We partner and collaborate throughout our industry with several non-government organisations and our major customers. We contribute to programs that support our local and global communities, which are important to strengthening human rights in the communities in which we operate. These partnerships and industry collaboration groups are important to help us share learnings and communicate ideas to help prevent Modern Slavery.


PARTNERSHIP



PACIFICAL

We have a long-established partnership with Pacifical, who are global leaders in promoting sustainably and socially responsibly caught tuna, including skipjack and yellowfin. Our John West tuna is verified at sea by trained observers working under the Pacific Island Regional Observer Program standard, serving as impartial eyes and ears onboard tuna vessels. These observers are placed in accordance with the Parties to the Nauru Agreement (PNA)/Pacifical Social Accountability Guidelines to monitor compliance, collect data, and report on working and living conditions aboard vessels operating in the waters of the PNA. As part of their commitment to impartiality, the PNA observer agency ensures that observers are from countries other than the nationality of the vessel's flag. This partnership provides us with assurance that the vessels catching John West tuna meet our sustainability and human rights standards. Further details on how we strengthened our traceability and assurance in our tuna supply chain with Pacifical during the reporting period is provided on Page 13.

INDUSTRY COLLABORATION



Member

SEDEX


Sedex is an ethical exchange database, whose mission is to supply data-driven insight through the most accessible tools and services, to support companies to improve their environmental, social and governance outcomes. We maintain an active membership and all five of our Australian manufacturing sites have completed the Self-Assessment Questionnaire, which is continually reviewed throughout the year. We actively participate in Sedex member education sessions and forums to learn and evolve our approach to addressing modern slavery to align with industry standards.



GLOBAL SUSTAINABLE SEAFOOD INITIATIVE


The Global Sustainable Seafood Initiative (GSSI) is a pre-competitive public-private partnership bringing together hundreds of diverse organisations from across the globe, united by a common purpose to drive forward more sustainable seafood for everyone and preserve our aquatic resources for the future.

Simplot has been a member of GSSI since March 2022 when we became the first funding partners in Australia. During the reporting period we worked with GSSI to develop an internal education session on seafood supply chain risks which was delivered to our seafood procurement category managers. While GSSI's primary focus is on the certification of environmental standards within the seafood industry, their collaboration with the Sustainable Supply Chain Initiative (SSCI) works to align social standards and highlights the importance of addressing worker welfare in the seafood industry. The session expanded on that by emphasising species and geographies requiring vigilance and offering practical recommendations for due diligence in sourcing. It was an invaluable opportunity for our team to deepen their understanding of both environmental and human rights risks in our seafood supply chain. We will continue to work with GSSI to develop further educational sessions throughout the year.




CUSTOMER COLLABORATION

We collaborate with key customers to share emerging insights, the areas of focus for our respective businesses and understand what areas we could work on together to mitigate modern slavery in our mutual supply chains. This customer collaboration is invaluable as the benefits of sharing industry developments and knowledge helps to advance our Program.



AUSTRALIAN FOOD AND GROCERY COUNCIL (AFGC)

Simplot is represented on various groups and committees within the AFGC, allowing us to stay abreast of, collaborate on, and contribute to issues facing the food and grocery industry in Australia, including topics such as modern slavery.



INDUSTRY NETWORKING

We play an active role in collaborating with like-minded businesses in our network to learn, develop and understand best practice in the design and implementation of our Program.



ACTIONS TO MITIGATE AND ADDRESS MODERN SLAVERY RISKS

We have a strong governance framework that manages our modern slavery risks across our operations and supply chain. This includes our policies, contracts, monitoring activities, governance structure and engagement with our team members and suppliers.

GOVERNANCE STRUCTURE

We are committed to upholding human rights and taking the necessary steps and actions to ensure that we identify, manage, and mitigate risks of modern slavery. The accountability and ultimate responsibility for managing human rights risks, including modern slavery, reside with our Simplot APAC Leadership Team, who are supported by our Global Sustainability Leadership Team, Global Food Sustainability Leadership Team, Anti-Modern Slavery Governance Group and the operational teams who action the Anti-Modern Slavery Program on a day-to-day basis.

Our Anti-Modern Slavery Governance Group is responsible for identifying and assessing risk and executing actions to advance our Program. Activity throughout the reporting period included communicating with our suppliers on compliance requirements, implementing and undertaking our revised pre-screening process for new suppliers and sites, supporting delivery of training and education material, and determining escalation points for any areas of concern identified. The avenue for escalating concerns related to modern slavery is at our regular Simplot APAC Risk and Governance Enterprise forum. Similarly, if any concerns are raised through our Whistleblower grievance channel the Simplot APAC Leadership Team will be informed.

SIMPLOT AUSTRALIA'S GOVERNANCE STRUCTURE





GOVERNANCE FRAMEWORK

Our policies outline the standards and principles that we expect our customers, contractors, suppliers and their suppliers to adhere to when conducting their business and business with us. As applicable to our suppliers, the standards and principles from the global **J.R. Simplot Code of Conduct** have been incorporated into **Simplot Australia's Partner Code of Conduct**. Similarly, the Partner Code of Conduct is also based on international standards and best practice guidance from the United Nations Guiding Principles on Business and Human Rights, International Labour Organisation and the Ethical Trade Initiative (ETI) Base Code. Simplot will not knowingly conduct business with suppliers who violate laws relating to employment, the environment or safety, or engage in any other unethical employment practice.

Our Program is documented in our Anti-Modern Slavery Governance Framework which outlines our operational team's responsibilities within the Program, how we assess and manage our modern slavery risks, procedures for escalation and emphasises our commitment to continuous improvement

MONITORING IN OUR OPERATIONS

We use a combination of mechanisms to monitor modern slavery risks in our operations. These methods include verification through internal processes, Sedex self-assessment questionnaires and customer-initiated reviews. Our five manufacturing sites are currently all rated as low risk in the Sedex platform.

We employ best practice methods during the recruitment process for prospective candidates to ensure that we hire employees in accordance with applicable laws. These checks include confirmation of a candidate's age to ensure they meet the minimum age requirements and a right to work check, such as a birth certificate, passport or visa, to ensure that they have the right to work in Australia. All team members also receive employee contracts and are covered by either an Enterprise Agreement, National Collective Agreement or the Fair Work modern award depending on their role and place of work. Any overtime hours worked must be voluntary and mutually agreed to by the employee and their manager. Any work outside of usual hours, such as in the evening, overnight or on the weekend, are paid in accordance with the applicable penalty rates. Similarly, all employees are paid their wages via an electronic transaction and receive a payslip. It is through a combination of these methods that we have assessed our operational risk of modern slavery as low.

The following identifies the mechanisms we use to mitigate risks in our supply chain through our Anti-Modern Slavery Program.

POLICIES AND PROCEDURES IN OUR OPERATIONS



J.R. SIMPLOT GLOBAL CODE OF CONDUCT:

Defines the global behavioural expectations for our team members with respect to other Simplot team members, suppliers, customers and members of the community.



WHISTLEBLOWER POLICY:

Provides a framework and encourages the reporting of instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Simplot. We respect the rights of individuals who defend human rights, and do not tolerate threats, intimidation or attacks against any individuals who raise concerns. To date, there have been no concerns raised through our Whistleblower mechanisms regarding modern slavery violations.



PROCUREMENT POLICY:

Outlines the process for procuring goods and services and requires activities to be conducted in an honest, competitive, fair and transparent manner.

POLICIES AND PROCEDURES FOR OUR SUPPLY CHAIN



PARTNER CODE OF CONDUCT:

We expect suppliers to adhere to all applicable laws and regulations and to use their best endeavours to comply with the principles of our Partner Code of Conduct. It includes clauses prohibiting the practice of forced labour, bonded labour, human trafficking, and child labour, as well as ensuring that workers work reasonable hours, receive fair wages, and are provided safe and healthy working conditions and the right to freedom of association and collective bargaining. Our supplier agreements include the Partner Code of Conduct as an appendix to all contracts which are reviewed and signed by the supplier. Currently, there are 225 suppliers who have signed our Partner Code of Conduct.



AGRICULTURAL SUPPLIER CONTRACTS:

Agricultural Supplier contracts include clauses that prohibit all forms of modern slavery and outline the process to be followed if any breaches are identified.



SUPPLIER ONBOARDING PROCESS:

We screen new suppliers during the scoping process to understand if there are any potential modern slavery risks prior to commencing business with them. This involves assessing risk through a pre-screening tool that firstly considers the risk associated with their country and sector of operation. Following that assessment, if they are considered high risk, we will request the supplier connects with us on Sedex prior to business award for further assessment of their Self-Assessment Questionnaires and any recent SMETA audit reports. If any concerns are present, they will be escalated

through our Anti-Modern Slavery Governance Group for recommendation on whether to proceed sourcing with conditions or not source. When a new supplier is then selected and onboarded, they are required to sign up to Sedex and sign our Partner Code of Conduct.



SUPPLIER FOOD SAFETY AND QUALITY AUDIT PROGRAM:

Simplot's Quality team manages a vendor assurance program that includes a supplier audit schedule based on key risk criteria in areas of Food Safety and Quality. Quality audits provide an opportunity to visit a supplier's site and if any concerns regarding worker conditions are witnessed, the Quality Assurance team will raise these with our Anti-Modern Slavery Governance Group.



SEDEX MEMBERSHIP AND AUDITS:

We accept Sedex membership or equivalent risk assessments. At our request, suppliers may be required to undertake a third-party social compliance audit.



PROCUREMENT SITE VISITS

Simplot's Procurement Category Managers visit supplier sites when scoping a new supplier and periodically as part of their ongoing relationship. Site visits provide the Category Managers the opportunity to further strengthen the relationship with the supplier and discuss expectations around modern slavery. The Category Managers actively identify and escalate concerns regarding working conditions if present, and will raise any concerns with our Anti-Modern Slavery Governance Group.

ENGAGING WITH OUR SUPPLIERS

We work closely with our suppliers to develop relationships to strengthen our combined approach to human rights to improve overall outcomes for our industry. During the reporting period our Sustainability team members attended supplier annual business review meetings to further our engagement process. These sessions involved specifically dedicated time to discuss our human rights approach, with key agenda items including actively sharing our Anti-Modern Slavery Program, discussing the mechanisms our suppliers have in place in their own operations to identify and mitigate modern slavery, and identifying any areas we could work on together to improve practices. We believe partnering with our suppliers to address the risks of modern slavery in our mutual supply chains will successfully mitigate any increased risks. Throughout the next reporting period we will review how we expand our engagement to other suppliers in strategic categories.

MONITORING OUR SUPPLY CHAIN

Our due diligence process for suppliers is governed by our Anti-Modern Slavery Program Framework, where we have embedded monitoring supplier compliance into our day-to-day operations. We identify any areas of potential risk through insights from scanning global sources of information such as the US Withhold Release Orders and Findings list, discussions with our major customers, self-assessment questionnaires and third-party social audits accessed through the Sedex platform. This year we have commenced sourcing goods or services with 36 new suppliers who have been onboarded as part of our Anti-Modern Slavery Program. The below outlines the framework for supplier engagement.

1 PRE-ASSESSMENT

- Screening of suppliers during sourcing process

2 ONBOARDING

- Sign Simplot Australia's Partner Code of Conduct
- Sign onto Sedex

3 RISK ASSESSMENT

- Inherent Risks
- Responses to SAQ

4 MONITORING

- Review audit findings
- Request audit (where required)

5 CORRECTIVE ACTION

- Corrective Action Plan

RISK ASSESSMENTS REVIEWED ANNUALLY

SELF-ASSESSMENT QUESTIONNAIRE (SAQ):

Once suppliers are linked with Simplot on Sedex, they are required to complete the SAQ on the platform. The questionnaire covers questions on social compliance management systems, including how they identify and address potential Modern Slavery indicators in their operations. A risk rating is then determined by Sedex and we use this as an indicator for identifying Modern Slavery risks. We request that suppliers review their SAQ every 12 months to ensure any changes to business operations are captured and the risk rating adjusted as required.

CASE STUDY: INVESTIGATION OF SEAFOOD SUPPLIER

During the reporting period, while undertaking a routine global scanning assessment for risks in our supply chain, an article identified that a site that we sourced seafood from in Asia owned and sourced from vessels that had previous allegations of modern slavery against them. Our internal team undertook an investigation into purchase order history and the vessel catch certificates from the site and confirmed that we had never received stock from the vessels identified in the article. We further took precautionary steps to find an alternative site for the products we were being supplied and as a result we moved those products to another supplier. While this investigation did not identify any substantiated instances of modern slavery, it demonstrated the effectiveness of proactive monitoring exercises as part of our Program which enabled our team to take effective action to mitigate risks in our supply chain.

THIRD PARTY SOCIAL COMPLIANCE AUDITS:

We review suppliers' most recent social compliance audits that are visible on the Sedex platform. We use this to identify any areas that indicate human rights violations and may prompt further investigation and escalation within our business. There were 73 audits undertaken by our suppliers during the reporting period in mutually recognised audit formats.

During the reporting period, we implemented the next phase of our third-party social compliance audit requests. The focus was seafood sites in Asia due to the identified risk assessment of this category and region. This involved requesting select suppliers to complete a SMETA audit conducted by approved auditing bodies, which operate globally. Following the completion of the SMETA audits, we requested that all non-conformances be closed out by the site within the recommended timeframe determined by the auditor. Our focus was specifically on any findings that related to Modern Slavery risks, and we were committed to working with the suppliers to remediate any findings. We will continue to evolve our third-party audit request process and, where applicable, use the outcomes of the SMETA audits to further inform our Anti-Modern Slavery Program framework and identify any areas in our Program that require development.

TEAM MEMBER EDUCATION AND LEARNING:

We conducted training with our new Procurement Category Managers who joined in key Operational roles during the reporting period. The purpose was to develop awareness and knowledge for those team members by building their understanding of what constitutes Modern Slavery and any potential risks to consider when choosing a new supplier to source goods or services. Topics covered included:

- Where and why does Modern Slavery occur
- The industries where Modern Slavery is most prevalent
- The different types of Modern Slavery
- Indicators a supplier could be high risk due to the supplier's sector, industry, geography or business structure.

We will continue to evolve our training program by providing refresher training to ensure we build knowledge and capability across our business.

Mitigating Risks in our Seafood Supply Chain

TUNA



Simplot continues to strengthen our partnership with Pacifical, the leading global tuna supply chain traceability and verification company. As detailed in previous Modern Slavery Statements, Pacifical provides assurance and digital evidence that Simplot's John West tuna is sustainably and responsibly caught. Pacifical's traceability system achieved a significant milestone this year with the successful launch of a digital platform. This platform exchanges data using the Global Dialogue on Seafood Traceability (GDST) standard via Pacifical's SmarTuna platform, which integrates directly with Simplot's internal "Trace Our Tuna" site.

The SmarTuna platform transmits major tracking events, ranging from fishing vessels to transshipment, discharge, and processing, providing real-time traceability of our tuna products per production code in seconds. The key element is the verification of raw material compliance before processing; If any allegations or instances of forced labor are identified by the Pacifical multilayer verification system, in which trained observers onboard tuna vessels are only one of the important layers, such raw material would be excluded from our supply chain and not processed into our John West products.

Simplot is proud to partner with Pacifical, who are advancing the industry by ensuring human rights are upheld and reinforcing supply chain integrity with unparalleled transparency and accountability.

SQUID



During the reporting period, Simplot became a member of the Global Squid Supply Chain Roundtable operated by the Sustainable Fisheries Partnership (SFP). The group focuses on engaging supply chains to launch and implement improvement initiatives to address Illegal, Unregulated, and Unreported (IUU) fishing and human rights abuses and support the long-term sustainability in squid fisheries. The Group's strategic goals include (1) Governance and Participation, (2) Transparency and Traceability and (3) Science Based Management and (4) Human Rights Due Diligence. Simplot joined to work within a pre-competitive industry alliance to improve standards. Our Simplot representative on the Roundtable participated in human rights awareness training organised by the SFP which highlighted learnings on modern slavery issues in the squid industry including 1) identifying appropriate tools and schemes to conduct human rights due diligence in their businesses, 2) cooperating with experts to develop human rights assessments in major squid fishing and processing sites, and 3) implementing purchasing procedures based on recommendations issued from the assessments. It is through our commitment and participation in global industry forums that we are working towards improving practices as an industry as well as in our own operations and supply chain.

SALMON



Processing of Alaskan Salmon can pose a risk in our supply chain due to the long working hours of the workers during the short timeframe of the salmon season. The factors that help to mitigate these risks include:

- Simplot has developed excellent, long term-relationships with our suppliers. Each year we have early pre-season discussions to confirm volume sanctions.
- Simplot category managers visit the sites on an annual basis where they have the opportunity to view the worker accommodation and canteen facilities.
- The hours worked by the workers are voluntary, transparent and known to the workers before they start for the season as they are part of their contracts written in their preferred language.
- We monitor the audit reports from the sites when available, and review the worker statements from the interviews confirming that they are satisfied with their pay and working conditions.
- The sites meet the Health and Safety requirements of the British Retail Consortium (BRC) Standards and are Marine Stewardship Council (MSC) Certified



ASSESSING THE EFFECTIVENESS OF OUR ACTIONS



We are continuing to assess the effectiveness of our activities and identify any areas of improvement in our efforts to minimise the risk of modern slavery in our operations and supply chain. Since the beginning of our Anti-Modern Slavery Program, we have improved our understanding of the risks in our supply chain by building our knowledge from our industry network, visibility of our suppliers’ audits and scanning global sources of information. We continually review our Program structure and governance framework to ensure that our efforts and focus to mitigate the risks of modern slavery are aligned with industry best practice.

We will continue to assess the effectiveness of our actions by partnering with our suppliers, recording actions and outcomes and working with external industry groups. As outlined in our previous Modern Slavery Statements, we assessed the risks of modern slavery in our operations to be low based on various internal and external verification methods, such as all our manufacturing sites continuing to maintain a low-risk rating on the Sedex platform. This reinforced that the actions we have taken to raise awareness, educate and make improvements within our business regarding modern slavery have been effective.

“We are committed to continuous improvement of our Program to identify and remedy any modern slavery risks.”

PROCESS OF CONSULTATION WITH RELEVANT ENTITIES

Simplot Australia is licensed by its parent company J.R Simplot Company to manufacture and sell the consumer brands that relate to this Statement. All our brands are overseen by the Simplot APAC Leadership Team and are governed by the same Anti-Modern Slavery Program. Simplot Australia owns Simplot Australia (International) Pty Ltd, a holding company, that in turn owns Simplot New Zealand Limited, a small sales office operating in New Zealand. Simplot New Zealand Limited does not have separate supply chains and operates under Simplot’s broader procurement and compliance framework. Consultation with Simplot New Zealand Limited was undertaken via engagement with Simplot’s leadership team that oversees the operations of Simplot New Zealand Limited and modern slavery risk management are centrally coordinated across both jurisdictions. Information on local New Zealand operations, supply chains and risk practices was reviewed and incorporated into Simplot’s assessment process and not considered to increase the risk of modern slavery to Simplot.

PROGRESS AGAINST OBJECTIVES AND AREAS OF FUTURE FOCUS

We are committed to continuous improvement of our Program to identify and remedy any Modern Slavery risks in our operations and supply chain. We will continue to work closely with our team members, suppliers and customers to further progress our policies, practices and standards across our business. Progress against our commitments in the previous reporting period is outlined below, along with our areas of future focus throughout the next reporting period.

Program Development

COMMITMENT	STATUS	PROGRESS DURING REPORTING PERIOD AND FUTURE FOCUS
Focus on areas of heightened modern slavery risks in our supply chain.	✓	FY24: Implemented next phase of supplier social compliance audit requests with seafood suppliers in Asia. FY24: Implemented improved due diligence process of pre-screening new sites and suppliers. FY24: Supported supplier to finalise recruitment fee remediation to workers at seafood site in Thailand. FY24: Reviewed scope of indirect categories to include selected high-risk suppliers in capital works categories.
	🔄	FY25: Progress third party social compliance audits requests with suppliers where required. FY25: Progress pilot with <i>Fair Trade</i> Australia New Zealand for developing a standard for risk assessment in agricultural grower operations.
Review Anti-Modern Slavery Program framework.	🔄	FY25: Continue to align with industry best practice for identifying and mitigating modern slavery risks. Review and evolve Program framework to meet these standards.
Achieve and maintain Sedex SMETA 4 Pillar accreditation for our manufacturing facilities where risks are identified.	🔄	FY24: Simplot and our customers in Australia continue to assess our operational risks as low. As such, we have not received any requests to complete SMETA 4 pillar audits at our manufacturing facilities. FY25: Continue to monitor and address risks at our manufacturing facilities. FY25: Support Simplot sites in global locations with onboarding to Sedex.

Education and Learning

COMMITMENT	STATUS	PROGRESS DURING REPORTING PERIOD AND FUTURE FOCUS
Maintain team member training on modern slavery awareness.	🔄	FY24: Conducted awareness training with new team members in key operational roles. FY25: Provide refresher training to team members where required and ensure new team members receive the required training.
Progress supplier engagement to address modern slavery risks in our supply chain.	🔄	FY24: Engaged with suppliers at annual business meetings to discuss our approach and expectations to addressing modern slavery risks and areas for collective improvement FY25: Continue to expand supplier engagement to other suppliers in strategic categories where applicable.

Industry Partnerships

COMMITMENT	STATUS	PROGRESS DURING REPORTING PERIOD AND FUTURE FOCUS
Continually identify areas where we can work with our partners to include human rights measures into responsible seafood sourcing across the industry.	✓	FY24: Worked with industry partner Pacifical to advance our systems regarding traceability and monitoring on fishing vessels. FY24: Worked with industry partner GSSI to develop internal education session on seafood supply chain risks. FY24: Joined Global Squid Supply Chain Roundtable to engage in industry action contributing to improving global practices in squid.
	🔄	FY25: Continue to strengthen our partnerships to leverage their industry expertise for development of our knowledge and Program.
Collaborate in industry forums and networking to share learnings.	🔄	FY25: Actively participate in industry forums, discussions and conferences throughout the reporting period.
Work closely with our customers to identify and manage human rights risks and optimise processes to address them.	🔄	FY25: Purposefully collaborate with our key customers on a frequent basis, to share emerging insights, compare program learnings and discuss areas of focus for our respective businesses with a view to working together to address modern slavery risks where possible.

Key: Completed = ✓ Ongoing = 🔄 FY24 = Current Reporting Period FY25 = Next Reporting Period

