



2022/23

**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.

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 the period 1 September 2022 to 31 August 2023 (“**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.

CONTENTS

- 3** A MESSAGE FROM SIMPLOT’S GLOBAL FOOD VICE PRESIDENT ASIA PACIFIC (APAC)
- 4** OUR COMPANY STRUCTURE, OPERATIONS AND SUPPLY CHAIN
- 5** IDENTIFYING MODERN SLAVERY RISKS
- 8** PARTNERSHIPS AND INDUSTRY COLLABORATION
- 9** ACTIONS TO MITIGATE AND ADDRESS MODERN SLAVERY RISKS
- 14** ASSESSING THE EFFECTIVENESS OF OUR ACTIONS
- 15** PROGRESS AGAINST OUR OBJECTIVES & AREAS OF FUTURE FOCUS



A MESSAGE FROM SIMPLOT’S GLOBAL FOOD VICE PRESIDENT APAC

I am pleased to share our fourth 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 our business in accordance with our Core Values. Under the People Pillar of our Sustainability Program, we are committed to taking actions and remediating any instances of modern slavery if discovered in our business.

I am pleased with the development and progress of our Anti-Modern Slavery Program this past year in identifying and addressing our modern slavery risks. For the first time we investigated three instances of modern slavery allegations in our supply chain. Two involved allegations of forced labour at supplier seafood processing sites in China, which were proven to be unsubstantiated. The third was regarding workers employed by one of our seafood suppliers in Thailand who required that their employees pay recruitment fees. This third allegation was substantiated, and we are currently working with our supplier to remediate the workers affected.

We are committed to improving our Program and continually evolving to ensure our efforts are effectively dedicated to the areas that present the greatest modern slavery risks in our operations and supply chain.

We have continued to roll out education sessions with team members in key Program operational roles, improved our due diligence process of pre-screening new sites and suppliers and developed the next phase of our third-party social compliance audit requests.

We pride ourselves on being a business that works closely with our industry network to address the global issue of modern slavery. We have faced challenges this year requiring us to rely on our strong relationships with our suppliers and seek knowledge from our industry partners. It is through these combined efforts and by transparently sharing knowledge across the industry that we will improve the lives of all in our global community.

This Statement was approved by the Board of Simplot Australia on 27 March 2024.



Darren Tendler
Simplot’s Global Food Vice President APAC

KEY HIGHLIGHTS FOR CURRENT REPORTING PERIOD

Improved due diligence by developing a robust pre-screening process for onboarding new suppliers or sites.

Established a new supplier engagement process to address and mitigate modern slavery in our mutual supply chains.

Progressed next phase of third party SMETA social compliance audits for high-risk seafood suppliers in Asia.

Continued to roll out modern slavery awareness sessions with key team members.



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our Company Structure

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, Providore, 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 are also proud to work with over 300 Australian growers who supply about 400,000 tonnes of Australian vegetables to our operations each year.

Our Operations

In Australia, Simplot directly employs about 2,000 people and many of them work 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, and ingredient and packaging suppliers. We work closely with 2,456 suppliers, of which 2,267 (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 2,456 suppliers, of which 590 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 following identifies the categories and numbers of suppliers in scope of the Program:

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 that form 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 refer to suppliers that 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.



- LEGEND
- HEAD OFFICE
- SALES OFFICES
- MANUFACTURING SITES
- AGRICULTURAL SERVICES

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

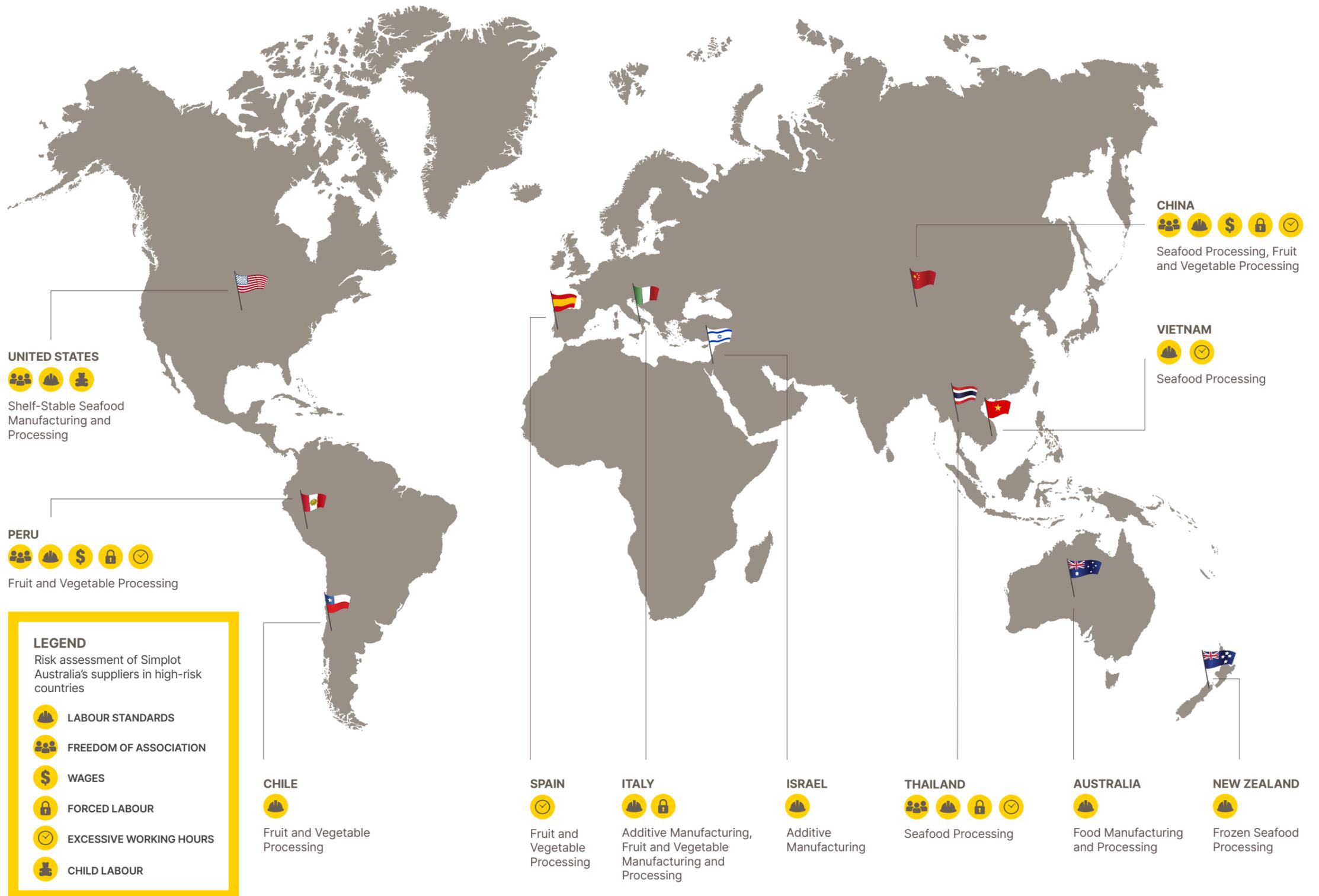
We assess the risk of modern slavery within our supply chain to be higher risk due to less operational oversight. As such, we believe the best process for identifying and mitigating modern slavery risk involves collaboration and partnership with our suppliers, partners, and growers. The mechanisms for verifying and managing this risk is further detailed on Page 12.

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. During the reporting period, 100% of our Agricultural Suppliers 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. The next phase of our risk assessment process with our Agricultural Suppliers will include undertaking further assessments of the small number of growers that occasionally use labour hire agencies in their operations.

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:





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 the Pacific Region leaders in promoting verified sustainably and socially responsibly caught skipjack and yellowfin tuna. Our supply from Pacifical is screened on a trip by trip basis by trained observers to the Pacific Island Regional Observer Program standard to be their eyes and ears at sea. Their role includes monitoring compliance, collecting data and reporting on the working and living conditions onboard tuna vessels fishing within Parties to the Nauru Agreement (PNA) waters using the PNA/Pacifical **Social Accountability Guidelines**. This partnership provides us with assurance that the vessels catching John West tuna meet our sustainability and human rights standards.

INDUSTRY COLLABORATION

SEDEX

Sedex is a supply chain sustainability data platform and solutions provider, supplying data-driven insight through accessible tools and services to support companies improving 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 forums, including providing feedback on proposed position papers by Sedex with the aim to meet our commitment to support streamlining and standardising the overall industry approach to addressing modern slavery to improve industry outcomes.

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.

CUSTOMER COLLABORATION



We frequently 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.

INDUSTRY NETWORKING



We play an active role in collaborating with like-minded businesses in our network to learn, collaborate 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 Board, Simplot Global Food 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 developing communications with our suppliers on compliance requirements, developing and reviewing 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

We have a comprehensive set of policies, standards and practices that outline our values and ways of working. 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. During the reporting period, we reviewed and updated the Framework to reflect the improvements made in our pre-screening process for new suppliers and sites and the preferred auditing bodies we request suppliers use when asked to conduct a SMETA 4 Pillar social compliance audit.

MONITORING 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 using the Sedex self-assessment questionnaire.

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.



SIMPLOT AUSTRALIA'S 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. During the reporting period, we strengthened our supplier contracts by including the Partner Code of Conduct as an appendix to all contracts, these are reviewed and signed by the supplier. Currently, there are 236 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. During the reporting period, we reviewed and strengthened this process, which is described further on Page 12. 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 are trained to identify any 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, we evolved our supplier engagement process with our key strategic suppliers in seafood categories in Asia. The purpose was to refresh communications regarding our expectations and requirements for suppliers to have in place their own mechanisms to identify and mitigate modern slavery in their operations. At the supplier's annual business review meetings, we have begun allocating dedicated agenda time to these collaborative discussions. 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 expand our engagement to other strategic supply categories in our business beyond our seafood 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 16 new suppliers who have been onboarded as part of our Anti-Modern Slavery Program. The below outlines the framework for supplier engagement.



STRENGTHENING SUPPLIER ONBOARDING PROCESS:
During the reporting period, we strengthened our new supplier and site due diligence onboarding process. By working collaboratively with our Vendor Assurance and Procurement teams, the new process involves assessing supplier 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 Questionnaire 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. These additional steps in pre-screening new suppliers and sites add to the strength and rigour of managing the risks in our supply chain.

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.

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 51 audits undertaken by our suppliers during the reporting period in mutually recognised audit formats and a total of 203 audits since our Program monitoring began in 2019.

We have developed and implemented the next phase of our third-party social compliance audit requests. The focus for this phase is seafood in Asia due to the risk assessment of this category and region. This involves requesting select suppliers to complete a SMETA audit using approved auditing bodies that have global operations. Following the completion of the SMETA audits, we request that all non-conformances are closed out by the site within the recommended timeframe determined by the auditor. Our focus is specifically on any findings that relate to modern slavery risks and working with the supplier to remediate any findings. We will 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:
During the reporting period, we progressed our education and awareness training by conducting training with our Procurement Category Managers of Indirect Suppliers and Logistics Suppliers. The purpose was to increase awareness and knowledge for those team members in key Program operational roles by refreshing 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 such as risks due to the supplier's sector, industry, geography, or business structure.

We also ensured that any new team members working in key Program operational roles undertook the relevant training module. We will continue to evolve our training program by providing refresher training to ensure we build knowledge and capability across our business.



ALLEGATIONS INVESTIGATED:

During the reporting period, we investigated three allegations of modern slavery. Details are outlined below:

Location: Seafood Site in China A		
ALLEGATION	INVESTIGATION	ACTIONS TAKEN
Forced labour at supplier's processing site	Our investigation established that we had never sourced from the site that was subject to allegations of forced labour. We had a contract in place with the supplier to source from their processing site since 2019 and were linked on the Sedex platform, but as the site was only a back-up contingency supplier we had never received stock in that time.	<ul style="list-style-type: none"> • Delisted site from our contingency supplier list as a precaution • Unlinked on Sedex • Liaised with direct supplier to understand management of their sites (our second-tier suppliers), including requesting all remaining sites sign our Partner Code of Conduct • Issued questionnaire to remaining second tier sites requiring confirmation that no forced labour is present on site
Location: Seafood Vessel/Site in China B		
ALLEGATION	INVESTIGATION	ACTIONS TAKEN
Forced labour on vessel supplying supplier site	Our investigation established that the vessels with allegations of forced labour had never supplied the site we procure from. We conducted an in-depth review of consignment and traceability reports from vessel to site and confirmed we also do not source the species fished on the vessel.	<ul style="list-style-type: none"> • Supplier signed declaration confirming they had not used the vessel in question and provided traceability records which were independently verified by our internal team • Reviewed site's previous social compliance audit history
Location: Seafood site in Thailand		
ALLEGATION	INVESTIGATION	ACTIONS TAKEN
Recruitment fees charged to workers	Our investigation found that recruitment fees were charged to workers when they were onboarded at one of our supplier's processing sites in Thailand. Whilst the fees charged were in line with ILO guidelines, it was not common practice at other sites supplying Simplot.	<ul style="list-style-type: none"> • Reviewed the supplier's processing site's recruitment policy and received commitment during the reporting period from the site not to charge recruitment fees for future workers (from 2024 charging recruitment fees will no longer be permitted in Thailand). • Developed plan with supplier to remediate current affected workers during the first half of 2024. Simplot financially contributing to these remediation payments. • We will undertake a review of any site's audits that have non-conformances raised regarding recruitment fees and, where required, determine further action.

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 through increased supplier Sedex SAQ completion and visibility of our suppliers' audits. 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 the SMETA 4 Pillar Social Compliance audit conducted at our Ulverstone site in 2021; all our manufacturing sites continue 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 does not own or control any other operating entities, and therefore this criteria is not applicable and consultation with relevant subsidiaries is not required.

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 embed 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.	🔄	<p>F23: Developed next phase of supplier social compliance audit requests with seafood suppliers in Asia.</p> <p>F23: Reviewed and improved due diligence process of pre-screening new sites and suppliers.</p> <p>F24: Review historical audit non-conformance findings regarding recruitment fees.</p> <p>F24: Extend scope of indirect categories to include selected high-risk suppliers in capital works categories.</p>
Ensure an appropriate risk identification and mitigation process is in place for agricultural growers.	🔄	<p>F23: Completed the initial risk assessment process with 100% of our agricultural suppliers.</p> <p>F24: Develop the next phase of our Program to review the few agricultural suppliers that use labour hire agencies as part of their operations.</p>
Ensure supplier contracts address modern slavery compliance.	✅	<p>F23: Updated the current contracts to include our Simplot Australia Partner Code of Conduct as an appendix in all contracts which are reviewed and signed by the supplier.</p>
Achieve and maintain Sedex SMETA 4 Pillar accreditation for our manufacturing facilities where risks are identified.	🔄	<p>F23: Simplot and our customers 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.</p> <p>F24: Continue to monitor and address risks at our manufacturing facilities.</p>

Education and Learning

COMMITMENT	STATUS	PROGRESS DURING REPORTING PERIOD AND FUTURE FOCUS
Maintain team member training on modern slavery awareness.	🔄	<p>F23: Conducted training and education awareness with the remainder of team members in operational roles, including Indirect Procurement and Logistics.</p> <p>F24: Provide refresher training to team members where required and ensure new team members who join the business receive the required training.</p>
Develop and maintain a supplier education program on human rights.	🔄	<p>F23: Developed and implemented supplier engagement process of discussing expectations and areas for collaboration with key strategic suppliers in seafood in Asia.</p> <p>F24: Expand to other strategic suppliers outside of seafood in Asia.</p> <p>F24: Continue to review progress with suppliers selected in first phase of engagement process.</p>

Industry Partnerships

COMMITMENT	STATUS	PROGRESS DURING REPORTING PERIOD AND FUTURE FOCUS
Collaborate in industry forums and networking to share learnings.	🔄	<p>F23: Actively participated in industry forums, discussions and conferences throughout the reporting period.</p>
Work closely with our customers to identify and manage human rights risks and optimise processes to address them.	🔄	<p>F23: Purposefully collaborated 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.</p>
Work together with the industry to streamline and standardise the overall industry approach to improve compliance with the Modern Slavery Act.	✅	<p>F23: Actively participated in industry forums, including Sedex member forums and provided feedback on proposed position papers by Sedex.</p>
Continually identify areas where we can work with our partners to include human rights measures into responsible seafood sourcing across the industry.	🔄	<p>F23 & F24: Ongoing discussions with industry partners regarding traceability and monitoring on fishing vessels.</p>

Key: Completed = ✅ Ongoing = 🔄 F23 = Current Reporting Period F24 = Next Reporting Period

