



**Costa Group Consolidated Holdings Pty Ltd**



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### Acknowledgement of Country

In the spirit of reconciliation Costa acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea, and community. We pay our respects where we live work and grow, and across all Costa locations to elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

## Message from the CEO

I am pleased to present our 2024 Modern Slavery Statement which, in line with Australian modern slavery reporting legislation, outlines the ongoing efforts and actions we have taken to address and mitigate the risk of modern slavery during 2024.

As a global business, Costa understands the risks of modern slavery and the impacts it can have on individuals and communities, and we acknowledge the importance of fostering a supply chain that is also free from modern slavery. In our operations, people are central to our success and we continue to build a culture where everyone is treated fairly and with respect.

We are committed to a process of continuous improvement and in 2024 reviewed the recommendations of an external review of our modern slavery responses and actions. This forms the basis for our 2025 Action Plan.

Also in 2024, Costa's People Assurance Team implemented a Complaints Policy and Procedure and new reporting options for workers to raise a concern or report an incident. The People Assurance team has also continued to focus on ensuring Labour Hire Providers meet relevant standards and legislative requirements.

In addition, a new analytics solution was developed in 2024 and implemented at the start of 2025 to provide enhanced monitoring and tracking of vendor ethical compliance. This aims to enhance our compliance oversight, with proactive alerts for potential ethical sourcing compliance issues.

We remain committed to upholding and protecting the rights of workers across all our operations and will continue to identify areas for improvement.



Marc Werner  
Chief Executive Officer



## CRITERIA 1: Reporting Entity

Costa Group Consolidated Holdings Pty Ltd (Costa) is a private company owned by Driscoll's Inc and entities associated with Paine Schwartz Partners and British Columbia Investment Management Corporation.

The head office is located at Level 5, 818 Bourke Street, Docklands, Victoria, 3008, Australia. This Statement has been published in accordance with the Modern Slavery Act 2018 (Cth) (MSA or Act). It covers Costa Group Consolidated Holdings Pty Ltd and its wholly owned subsidiaries.

This Statement also covers African Blue SA, and its subsidiaries, including Sweet Berry SA and African Blue (UK) Pty Ltd (together African Blue), which is a joint venture between Costa and Dole UK Ltd, and the Costa Driscoll's joint venture in China.

A full list of Costa's Australian and international subsidiaries, covered by this Modern Slavery Statement, is included in Appendix A.

T +61 3 8363 9000  
E [info@costagroup.com.au](mailto:info@costagroup.com.au)  
W [costagroup.com.au](http://costagroup.com.au)  
ABN 68 757 363 729

Costa also operates a joint venture with Driscoll's Inc, Driscoll's Australia Pty Ltd, to supply fresh berries to Australia and New Zealand. As Costa has a 50% interest in that joint venture rather than majority ownership, its operations are not included in this Modern Slavery Statement and the joint venture will report separately in its own Modern Slavery Statement.

This Modern Slavery Statement was approved by the Board of Costa Group Consolidated Holdings Pty Ltd on the 20<sup>th</sup> May, 2025.

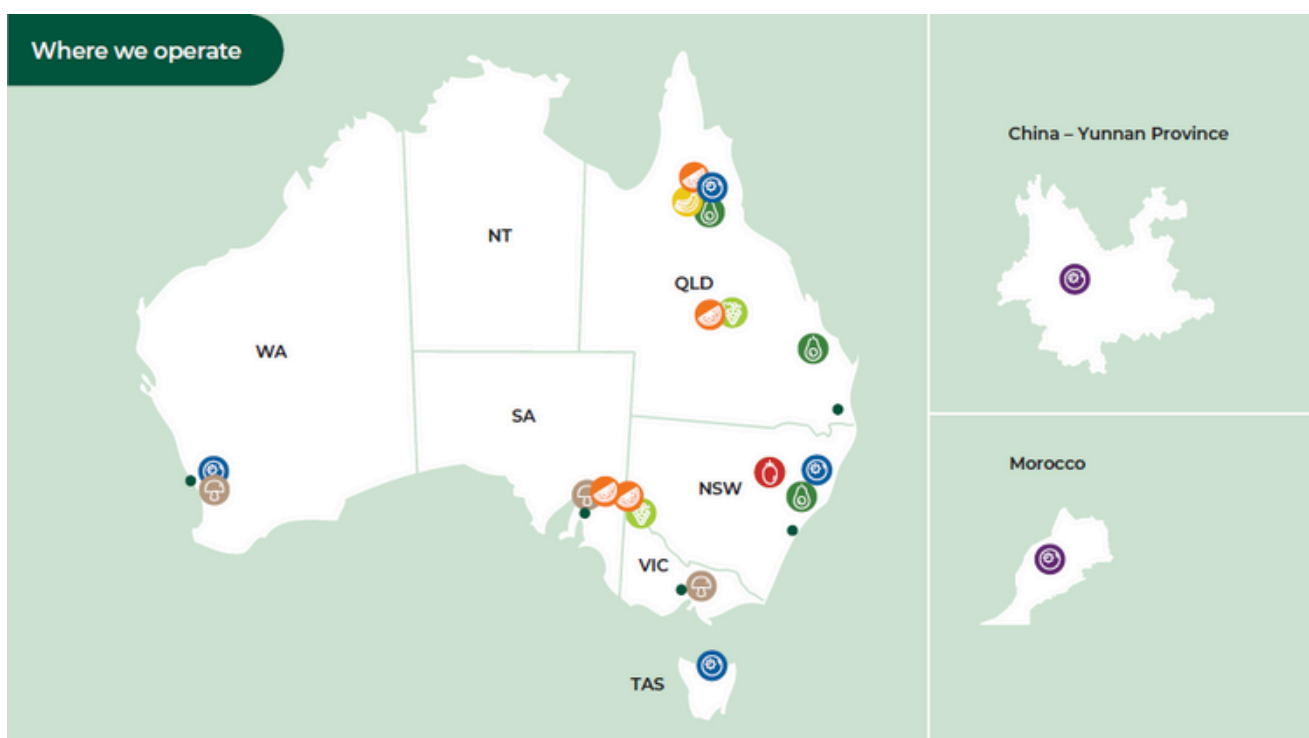
### Key facts 2024

10,578 full time equivalent workers across all our operations.

Costa's workforce is composed of people from 91 different nationalities.

8000+ planted hectares of farmland; 40 hectares of glasshouse facilities; and three main mushroom growing facilities. Six blueberry farms in Morocco and five blueberry farms in China.

Approximately 87% of Costa's direct hire staff in Australia are covered by enterprise (certified) agreements and 13% are on individual contracts or flexibility arrangements.





## CRITERIA 2: Structure, Operations and Supply Chain

### Structure

Costa is a privately owned international farming, marketing and distribution company selling produce globally.

Costa owns and operates farms in Australia, China and Morocco and sources fruit through third-party produce supply partners ("produce supply partners") in Australia, Morocco and elsewhere in Africa and the Americas.

Costa owns a controlling share in African Blue SA and its subsidiaries, including Sweet Berry S.A and African Blue (UK) Ltd (together African Blue). African Blue S.A is a joint venture between Costa and Dole UK Ltd. Costa operates a separate joint venture with Driscoll's Inc in China, growing berries for sale into the local Chinese market. These entities are all covered by this Modern Slavery Statement.

### Operations

Costa is Australia's leading grower and marketer of fresh fruit and vegetables and is the largest fresh produce supplier to the major Australian food retailers.

Operations include more than 8,000 planted hectares of farmland, 40 hectares of glasshouse facilities and three main mushroom growing facilities across Australia. Costa also operates majority owned joint ventures covering six blueberry farms in Morocco and five berry farms in China. In late 2024, Costa began construction of a berry operation in Laos which became operational in 2025.

As at December 31, 2024 the African Blue operation in Morocco covered approximately 351 planted hectares and in China, the joint venture included 400 planted hectares.

The Costa business model is built on the optimisation of a portfolio of integrated farming, packing, and marketing activities. Costa's products are predominantly grown and sourced from the company's footprint of domestic and international farms, supplemented with produce sourced through a network of third-party produce supply partners.

Costa operates across three segments: Produce; International; and Farms and Logistics.

Costa's Produce business operates across: berries, mushrooms, citrus, grapes, glasshouse-grown tomatoes, avocados and bananas.

The International business division comprises licensing of proprietary blueberry varieties and berry farming in international markets including Morocco, China and Laos.

The Farms and Logistics business division incorporates interrelated logistics and wholesale marketing of produce.





## CRITERIA 2: (Cont.)

### Produce

In 2024, produce sold by Costa in Australia was sourced from 215 produce supply partners (see table). The number of supply partners vary through the year depending on the seasonality of the produce. Costa also imported fruit from one agent based in the United States, sourcing from seven growers in the US and one in Mexico.

Growers supplying to Driscoll's Australia are not included in references to Costa's produce supply partner base within this statement and will be reported as part of Driscoll's Australia's Modern Slavery Statement.

In Morocco, African Blue exports berries grown by African Blue, its subsidiaries, and licensed growers of Costa blueberry varieties in Africa. In 2024, there were a total of 11 produce supply partners in Morocco.

African Blue also had four produce supply partners in South Africa and seven in Zimbabwe. The China Joint Venture does not use third-party produce suppliers.

### Labour hire and other services

In 2024, Costa utilised the services of 24 labour hire providers to meet the labour force requirements for harvest in its Australian operations.

African Blue used one labour hire provider in the south of Morocco. In China, all labour is employed directly for our farms. Labour agencies are used to assist in sourcing labour, and are paid a fee for this service, but the employment relationship is directly with Costa. No fees are passed onto workers.

A range of other services are used by Costa including: transport services such as road freight (domestic fresh produce transport), sea freight (export of fresh produce), warehousing, cleaning, and security.

Product	No. of produce supply partners
Avocado	60 at peak of season
Tomato	5
Grape	69 at peak
Citrus	8 at peak
Banana	14
Other (various fruit and vegetables)	59

Table 1: Produce supply partners in Australia.





## CRITERIA 2: (Cont.)

### Supply Chain

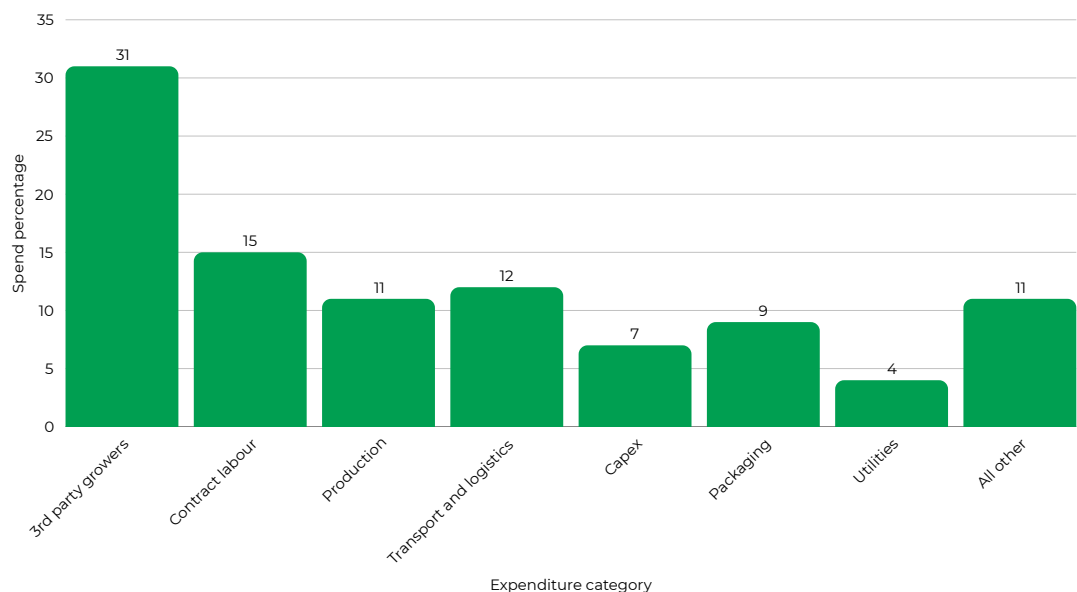
Costa's operations span multiple continents, and we source products from Australian and international supply chains. Our supply chains also include labour hire and procurement of other services and goods not for resale.

### Goods

Suppliers provide a range of goods not for resale. The largest categories, excluding contract labour, relate to goods associated with production, transport and logistics, other goods and services, and packaging.

For our domestic operations, these are predominantly sourced from Australian based companies; however, their supply chains may be geographically diverse ranging from small businesses to global companies. In 2024, the top 10 countries outside of Australia for supplier spend for our Australian operations were: Singapore, United States, Netherlands, Laos, China, Spain, Canada, United Kingdom, Hong Kong and New Zealand.

We recognise that in some instances companies we engage with as suppliers in Australia may be sourcing products internationally.



Graph: Supply Chain Expenditure 2024 for Australian operations.





## CRITERIA 3: Risks of modern slavery practices

Costa's operations span multiple continents, and we source products from Australian and international suppliers, who in turn have local and international supply chains. Given the large number and geographic diversity of stakeholders operating across the supply chain, Costa recognises there is potential across this complex and dynamic environment for modern slavery and human trafficking to occur.

While Australia is among the least vulnerable countries to modern slavery in the Asia Pacific region and globally, according to the Global Slavery Index 2023, some industries including agriculture have been identified as high-risk.

In horticulture, the types of modern slavery identified as being most likely are forced labour, debt bondage and deceptive recruiting for labour or services. This is due to the high reliance on migrant workers, many of whom have limited understanding of English and who may be less aware of their legal and human rights.

### Operations

Costa has in place robust systems, policies and procedures aimed at protecting the rights of all our employees, and ensuring adequate checks are carried out to minimise the risk of modern slavery occurring.

In our Australian and international operations, where we directly recruit workers the risk of modern slavery occurring continues to be assessed as being relatively low, despite the risks outlined, as we have in place a number of controls to mitigate these risks (see section on Due Diligence page 13).

This includes a dedicated People Assurance team, Ethical Sourcing Manager, Group Manager

Pacific Labour, and in Australia a centralised payroll system which monitors work hours and deductions for employees. In Australia, 87% of our direct hire staff are covered by awards or enterprise agreements and 13% are on individual contracts or flexibility agreements. In our international operations, all employees are covered by a contract of employment.

Each business unit within Costa, including our international operations, has a dedicated Human Resources team, which is supported by a central HR team.

In our international operations, geographical risk has been identified according to the Global Slavery Index 2023. The Index considers China and Morocco to have higher modern slavery risks. However, controls as outlined in our Due Diligence section, are in place to mitigate this risk.

### Supply Chain

With a diverse supply chain, we understand our risk profile will continue to evolve and we continue to assess our modern slavery risks across our supply chain including due diligence on new suppliers and periodic review of existing suppliers.

The UN Guiding Principles on Business and Human Rights (UNGPS) provides a framework for us to prevent and address human rights abuses including modern slavery. This covers - causing, contributing or being directly linked to harm.

In our supply chain, several key areas have been identified where there is considered to be a heightened risk of modern slavery.





## CRITERIA 3: (Cont.)

### Potential risks caused by Costa

Use of labour hire: Costa engages temporary and seasonal workers through labour hire companies during certain times of the year. Rigorous controls and due diligence processes are in place for the engagement of third party labour hire providers to help mitigate this risk.

Incorrect calculation of piece rates: Costa has in place rigorous payroll processes to mitigate this risk. Costa also has a Piecework Framework in place to ensure the correct calculations are made in relation to piece rates.

### Potential risks contributed to by Costa

Partner growers: Costa sources produce from produce supply partner farms which may present a higher risk of modern slavery. A number of our produce supply partners have been selected to undertake third-party social audits to the Sedex Members Ethical Trade Audits (SMETA) standard. We continue to raise awareness with and provide tools to produce suppliers to assist them to improve in this area, acknowledging that some growers are significantly less resourced. Through our targeted ethical sourcing program Costa aims to monitor, educate and mitigate these risks.

Certain not for resale goods and services: Costa has identified certain not-for-resale goods and services that due to their nature and/or geographical location have an inherently higher risk of modern slavery. These goods and services represent a small percentage of overall spend, and include such items as gloves, solar panels and some chemical inputs or cleaning and security services.

### Potential risks linked to Costa

Produce from outside the Costa/partner grower network: Costa's Farms and Logistics business acquires a very small percentage of fresh produce through intermediaries such as brokers and marketing agents on a market trading basis often in circumstances where it does not have direct grower relationships.





## CRITERIA 4: Addressing modern slavery risks, due diligence and remediation

Costa has in place a Modern Slavery Working Group which continues to review and advise on the strategic direction and performance of Costa's modern slavery response and to support Costa to deliver a meaningful response to modern slavery.

The Working Group is cross-functional and members include ethical sourcing, human resources, legal, communications, procurement and operational experience. The Group periodically reports back to the Executive on Modern Slavery remediation, progress and strategies.

In 2024, Costa continued to work towards meeting the targets outlined in our Action Plan, which help to drive our response to human rights and modern slavery risk in our operations and across our supply chain.

Action	Target	Progress 2024
Review/consider and implement where appropriate recommendations from our external review of our Modern Slavery progress.	Completion by end 2024.	<b>Recommendations for action to be implemented in 2025.</b>
% Australian Growers and Suppliers on Sedex – or equivalent.	100% direct growers. 100% labour hire providers. 100% of all other suppliers identified by Costa as Higher Risk. (Note: Due to change in suppliers and business acquisitions there may be periods this does not hit 100%)	<b>90%</b> <b>96%</b> <b>79%</b> (see section on Due Diligence for detail)
Advanced Awareness training for people in key roles	100% of people currently in key roles* have participated in Advanced Awareness training. Develop process for training harvest supervisors.  Train people newly entering key roles within six months of their commencement in that role. Training to be refreshed on a biennial basis.  Train people newly entering key roles within six months of their commencement in that role.	<b>100% of people in key roles completed the Mandatory Advanced Awareness Training and a training refresher was provided to 311 employees in key roles.</b>  <b>Individuals in key roles were assigned the training module within the first four weeks of their role. Non-completion escalation procedures were implemented resulting in all individuals completing these modules before year end.</b>
General awareness training and communication	Use additional tools or communication as required, including Toolbox Talks.  General awareness communication to be provided to 100% of produce supply partners.	<b>The Modern Slavery Toolbox Talk was refreshed and relaunched in January 2024.</b>  <b>Ongoing.</b>

CRITERIA 4: (Cont.)

Action	Target	Progress 2024
	Whistleblower hotline information available in local languages across 100% of sites.	<b>Whistleblower information in language is provided to each site for display and regular auditing is conducted to encourage compliance.</b>
	Preparation of modern slavery video training.	<b>Video training preparation postponed due to pending new Human Capital Management system implementation.</b>
	Add Modern Slavery identification information to induction pack for every new employee.	<b>Modern Slavery was incorporated into the standardised version of induction materials, with implementation of this across sites in progress.</b>
Audits	10% of Australian grower sites audited within the 2024 reporting period.	<b>20% of Australian grower sites audited in 2024.</b>
All direct suppliers to the Australian business to be provided the Supplier Code of Conduct**.	100%	<b>Issued automatically to all new vendors.</b>

\*Key role groups: Executive, Human Resources, Procurement and Legal and who have significant labour management and/or supervisory responsibilities.

\*\* Excludes one time and irregular suppliers that are not registered as suppliers in SAP.





## CRITERIA 4: (Cont.)

### Policy Framework

Costa has a comprehensive suite of policies that reflect our core values, and which outline our ways of working and expectations for our employees and suppliers. Policies are reviewed and updated on a regular basis. The following policies are most relevant to preventing modern slavery:

<b>Human Rights Policy</b>	Applies across all of our locations and demonstrates our commitment to respecting internationally recognised human rights. It sets out our expectations for the conduct of our employees and suppliers. The Human Rights Policy further aligns our approach to the UN Guiding Principles on Business and Human Rights Framework.
<b>Whistleblower Policy</b>	Provides a mechanism to encourage concerns to be raised about illegal or unethical conduct or behaviour by Costa and its employees and others authorised to represent Costa. An independently operated whistleblower hotline is also available for all workers on our farms (including labour hire workers) and other stakeholders.
<b>Recruitment and Selection Policy</b>	Sets out our recruitment and selection practices to be fair, equitable and free from discrimination. This includes eligibility to work in Australia and compliance with child labour laws.
<b>Code of Conduct</b>	Sets out the values, commitments, ethical standards, and policies of the Company and outlines the standards of conduct expected of our business and people.
<b>Supplier Code of Conduct</b>	Articulates Costa's expectations and requirements for all suppliers. Costa expects suppliers to respect and be accountable for compliance with this Supplier Code and to develop the necessary tools, record-keeping, and management systems to support this compliance.
<b>Complaints Policy and Procedure</b>	Developed to provide guidance on roles, responsibilities, reporting options and the process around reporting and handling of complaints.
<b>Anti-Bribery and Anti-Corruption Policy</b>	Supports and supplements Costa's Code of Conduct and Whistleblower Policy and is designed to promote and reinforce Costa's culture of and commitment to lawful and ethical behaviour.
<b>Costa Labour Standards</b>	This standard sets out the Company's commitment to ensuring the health and wellbeing of its workers, whether sourced directly by Costa or through a Labour Hire Provider.
<b>Sexual Harassment Policy</b>	Sets out standards of behaviour and conduct in relation to sex-based and sexual harassment.

## CRITERIA 4: (Cont.)

### Due Diligence

#### Ethical Sourcing Program

Costa's expectation is that all workers employed within our own business, and that of our produce supply chain, are employed lawfully, fairly, treated with dignity and their human rights are respected.

In addition to ensuring that our direct employees are treated fairly and in accordance with all relevant laws, our challenge has been to better understand the employment practices in our supply partners and to build capacity with our suppliers to identify and reduce the risk of modern slavery in our suppliers' businesses and supply chains.

Our approach to Ethical Sourcing is:

- Clear communication of our expectations in the form of the Supplier Code of Conduct.
- Identifying and assessing risks.
- Providing support and information through the use of the Ethical Sourcing Bulletin and support guides to mitigate risks.
- Providing guidance on forms of remediation.
- Providing remediation support if required.

In Australia, 37 of our own sites have completed self-assessment questionnaires (SAQ) in Sedex and we continued our multi-year rolling program of Sedex Members Ethical Trade Audits (SMETA) on 27 of these sites. The sites selected for audits are a cross section of all Costa categories and site functions including, farms, packhouse and distribution centres. These audits are focused on labour and health and safety.

They are undertaken by an independent third party certification body and strengthen our monitoring and due diligence of modern slavery risks within our own business. These audits are required to be undertaken during peak harvest season and if any issues are identified, remedial actions are agreed, implemented and then verified by the independent certification body.

As part of our rollout of Sedex within our supplier base, Costa is requiring its primary Australian suppliers to register on Sedex and complete the SAQs. These entities include produce supply partners, contract packers, ripening centres, labour hire providers and targeted procurement suppliers.

In Morocco, all of our own sites completed SAQs in Sedex in 2024 and all of these sites have also been audited to SMETA in 2024. In China, the Sedex SAQ is used as a basis for internal assessment and management of risk.

#### Procurement

Our commitment to ensuring human rights are protected extends to our supply chain and our expectations are communicated through our Supplier Code of Conduct. Costa values integrity and honesty in its business and seeks out these qualities in its partners and employees. Costa seeks to engage in business with other likeminded persons and entities that share the same principles and values.

Costa requires all its suppliers to comply with all applicable laws and, in all cases, to meet the standards and principles set out in the Supplier Code of Conduct. Compliance with such laws, standards and principles is a material consideration for us in assessing every aspect of our supplier relationships.

The Supplier Code of Conduct covers areas including: human rights and modern slavery; health and safety, including safe working conditions and fair wages/compensation; and immigration law compliance.

The Supplier Code of Conduct is incorporated in the Supply Agreements within the domestic supply chain, and all Australian suppliers are provided a copy of the Code as part of the procurement onboarding procedure.

Costa has set a target of 100% higher risk suppliers (based on spend and high industry risk classification) to be registered on Sedex or have in place their own Modern Slavery Statements and policies. In 2024, for this group of suppliers, we have identified and registered approximately 79% of total vendor expenditure as being compliant.

Costa has a large supplier base and we continue to see suppliers who are aware of their obligations in relation to modern slavery. We recognise that certain sectors require a more bespoke approach such as the provision of accommodation and our People Assurance team continues to implement procedures to reduce risk in this area. (See page 16).



## CRITERIA 4: (Cont.)

### Produce Supply Partners

Our Ethical Sourcing program is now in its sixth year and we have continued to refine and develop our approach. We use Sedex as a management tool to help the company understand the level and scope of social sustainability practices within our partner grower base. Through the Sedex data platform, we can assess management practices employed by our partner growers and work together with them to identify opportunities for improvement, provide support to mitigate risks and to take action where necessary.

In 2024, 90% of Costa's Australian produce supply partner base was registered on Sedex and shared visibility of their site information with Costa during their supply season. We continue to use this information to risk assess employment management practices and identify the salient human rights issues in our produce supply chain.

In 2024 we temporarily excluded the Costa Farms and Logistics business from the Sedex targets. This resulted in the overall reduction of compliance down to 90% for our ethical sourcing program requirement for Sedex Membership.

We recognise that many of the small growers who supply the Costa Farms and Logistics business division may have challenges such as limited administrative and material resource to maintain our compliance criteria and require a higher level of support to attain our standards. Whilst Sedex targets were paused, we developed and implemented a more targeted supportive approach coaching growers to understand expectations on labour standards. We allocated resources to assist growers through the registration process on Sedex with the aim to have all growers registered by the end of 2025.

As identified in our previous statements, the use of third-party labour (labour hire) continues to be a key risk area. Through the Core SAQ hosted on the Sedex website we have visibility of all declared labour hire use in the produce supply partner base. Periodic compliance checks of SAQs completed by our suppliers, conducted in line with seasonality, confirmed that all recruitment is via formal recruitment methods. Where labour hire is used for recruitment, checks on SAQ data confirmed our suppliers have contract terms in place to comply with labour law and suppliers have checks in place to ensure labour providers are fulfilling contractual terms.

Costa has again revised and communicated support material for produce supply partners on labour hire monitoring. This guidance includes information, tools and templates. We continue to evolve and build on our approach based on the identified risks.

We continue to increase the use of third-party verification within our produce supply partner base using SMETA. In 2024, 44 audits were conducted on partner growers and where compliance issues have been identified, remediation activities have been implemented.

Over 90% of audit issue findings are represented across the areas of:

- Workplace, Health and Safety
- Regular Employment
- Wages
- Working Hours
- Responsible recruitment

Labour hire management will continue to be a focus of remediation and guidance in 2025.



## CRITERIA 4: (Cont.)



### Labour standards and labour hire providers

Costa's Labour Standards Policy covers the engagement and oversight of labour, along with the commitment to oversight of regulation and licensing of labour hire providers and government approved labour programs.

All Australian labour hire providers working with Costa must be registered on Sedex, linked to Costa and comply with Costa's Supplier Code of Conduct. In 2024, 95.8% of labour hire providers were registered on Sedex. They are also required to participate in regular SMETA audits (Sedex Members Ethical Trade Audit) and in SMETA audits of Costa sites to which the labour hire provider has provided workers. They must be compliant with any relevant state government labour hire registration schemes.

It is a Costa requirement that all new labour hire providers complete the self-assessment questionnaire (SAQ). In 2024, Sedex launched the Service Provider SAQ which empowers service providers to understand the importance of ethical practices and navigate the assessment process with confidence, streamlines the assessment process and focuses on specific risks across labour standards, health and business ethics and environment.

New labour hire providers are also required to complete a prequalification application form and provide all supporting documents for assessment before they are engaged. The pre-qualification

### Case study

A new analytics solution has been launched to monitor, track, and provide insights for Costa's vendor ethical compliance.

This solution, which was developed throughout 2024, went live in early 2025. It aligns live data on purchasing practices with ethical sourcing compliance.

Aligning multiple systems data enhances compliance oversight, reports compliance metrics, and proactively alerts users about approaching Ethical Sourcing Compliance issues.

includes questions relating to modern slavery awareness and risk, management practices, employment conditions, training provided to employees and accommodation and transport if provided by the provider.

### People Assurance Team

Costa's People Assurance Team collaborates with site teams to develop, review, improve and monitor Costa's labour standards, processes and associated HR policies. They also support teams in preparing for ethical sourcing audits and are responsible for undertaking audits of direct hire and labour hire engagement processes.



## CRITERIA 4: (Cont.)

The People Assurance team undertakes comprehensive desktop audits of labour hire providers to ensure ongoing compliance with Workplace, Employment and Immigration laws and Costa's Labour Standards. In 2024, 197 labour hire workers were captured in the desktop audits, identifying 51 non-conformances including worker contracts and payslips.

These were relatively minor issues and none constitute Modern Slavery. Non-conformances are communicated to the labour hire providers through a formal Corrective Action Plan Report (CAPR) which includes a deadline for taking corrective action or providing a justification to close the non-conformance.

Additionally, any observations made during the desktop audit are shared with the labour hire providers as opportunities for future improvement and guidance in preparation for upcoming SMETA audits. Internally, 99 direct Costa employees were captured in payroll audits across various business units. Where compliance issues were identified, remediation activities have been implemented and verified. These were also relatively minor issues.

Building on the progress made in 2023, there is continued focus on further improving the quality of accommodation provided by labour hire providers to their workers. This involves random inspections to ensure compliance with Costa's Accommodation and Services Policy. Where improvements are needed, a corrective action report is issued to ensure timely follow-up and continued adherence to both internal and external standards.

In 2024, Costa implemented its Complaints Policy and Procedure and communicated a range of reporting options available to workers to raise a concern or report an incident including 'Report

Concern' – Costa's confidential online reporting system, where reports can be made by scanning the QR code on the posters displayed across our sites. To support the Complaints Policy and Procedure, Toolbox Talks were held across Costa and a Contact Officer network, made up of trained Contact Officers, was established. The Contact Officers can be an impartial first point of contact for someone who is considering raising a concern.

Throughout the year there were regular support sessions available for the 52 appointed Contact Officers to attend, to build on their previous learnings and further provide them with the resources to feel confident in the role, provide practical advice and networking opportunities with fellow Contact Officers across Costa.

### **Payroll processes**

Costa undertakes regular review and audits of payroll processes as part of our ongoing commitment to best practice. Costa also has in place a Piecework Framework which articulates the process for setting piece rates, meal and rest breaks and record keeping systems. Produce supply partners' payroll processes are assessed through the Sedex SAQs and this is verified via third-party audit for selected sites.

### **Intermediaries**

Costa's wholesale business Costa Farms and Logistics acquires some fresh produce through intermediaries such as brokers and marketing agents in circumstances where it does not have direct grower relationships. Due to the transient nature of this trading activity and the inability to require Sedex registration, compliance with Costa's Supplier Code of Conduct has been incorporated into our Terms of Trade.



## CRITERIA 4: (Cont.)

### **Pacific Island workforce**

Costa's diverse workforce includes a significant number of people who are sourced through the Australian Government's Pacific Australia Labour Mobility scheme (PALM). This cohort is critical to support Costa's harvest periods, during which time significant numbers of farm workers are required and there is limited capacity to meet this need from within Australia alone.

Over a number of years Costa has been moving to a centralised direct employment model for the majority of our Pacific Island workforce. This long-term strategy aims to reduce the reliance on third party labour hire providers and therefore further risk of unethical sourcing and modern slavery issues, which is already in part mitigated through extensive accreditations and audits. It also helps to ensure the implementation of consistent high standards for welfare and wellbeing across our entire workforce and our community.

In 2024, Costa extended its program to include eight sending countries with the addition of Vanuatu. It also expanded its services to the Costa avocado category and welcomed the first long term stream of PALM workers (previously known as the PLS), with workers taking on more skilled roles for up to four years full time. This will continue across other farms in 2025.

In late 2024, the Pacific Labour Team also commenced a project to develop and translate an Offer of Employment Guide. The purpose of this Guide is to assist workers to better understand the details of their employment offer. The roll out commenced with over 100 Solomon Island workers in November 2024 and will be rolled out to all workers from seven out of eight source countries from the start of 2025.

### **Grievance mechanisms**

We believe that if we have caused or contributed to an adverse impact to internationally recognised human rights in our own business or that of our supply chain, a fair and just remedy should be implemented.

This is based on the Access to Remedy Principles of the UN Guiding Principles on Business and Human Rights. A worker's rights should not be impacted for raising concern or being involved in an investigation.

Within our own business, Costa has grievance mechanisms in place to identify and escalate issues relating to modern slavery. Costa has 11 category specific Whistleblower Officers across its businesses,

including the Moroccan and Chinese operations. These staff are provided with training as to how to receive and handle reports made under the Whistleblower Policy and afford whistleblowers adequate protection and support.

A whistleblower hotline service independently operated by Deloitte Halo, is available for all workers on our farms (including labour hire workers) and other stakeholders. The reporting service allows whistleblowers to make disclosures via phone, email or through the website [www.costawhistleblower.deloitte.com.au](http://www.costawhistleblower.deloitte.com.au): the service is provided in English, French, Arabic and Mandarin.

Details of the whistleblower hotline are communicated via posters, email messaging, toolbox talks and sit prominently on the landing page of the Costa Intranet. Costa's Whistleblower Policy contains a clear reporting procedure to help direct and resolve grievances.

In 2024, five contacts were made through the hotline, none of which related to modern slavery. Any material allegations that were substantiated were reported to relevant members of Costa's Executive team (with the complainant's details remaining undisclosed) to ensure that comprehensive and relevant actions could be put in place.

As outlined previously, Costa also launched a Contact Officer network and an online 'Report a Concern' option, in addition to existing reporting mechanisms. Contact Officers, who are situated at all our sites, are a vital first point of contact. They are trained employees who confidentially listen to concerns and provide support and advice on complaint options available.

In addition, the African Blue team in Morocco has a dedicated phone line for reporting unethical behavior, and complaint boxes have been installed at every farm.

### **Remediation framework**

Costa's expectation is that suppliers must provide an avenue for worker grievances to be heard, fairly investigated and where required appropriate remedial action taken. This is outlined in the Supplier Code of Conduct. Our suppliers are responsible for compliance with the Supplier Code of Conduct throughout their business and their supply chain. Costa has in place a Remediation Framework which provides guidance to suppliers for remediation activity.



## CRITERIA 4: (cont)

The document emphasises the responsibility of suppliers to have a timely, effective remedy, and mechanisms to prevent a reoccurrence, in the event of a non-compliance in respect to human rights. The framework also incorporates the Access to Remedy Principles of the UN Guiding Principles on Business and Human Rights. It includes guidance on responsibility, non compliance, documentation and record keeping, ongoing support and monitoring.

### Training and communication

Training and communication play a key role in educating and building capacity within our workforce in understanding modern slavery.

#### Advanced Awareness training

Costa delivers advanced awareness training through an online course titled Tackling Modern Slavery in Businesses - Australia. Made up of two modules, Stronger Together's Tackling Modern Slavery Australia and Costa's Response to Modern Slavery, the course is mandatory for people in 'key' roles, such as our Executive Team, People and Culture representatives, those working in Procurement or Legal and individuals who have significant labour management and/or supervisory responsibilities.

This course explains what modern slavery is, and the industries it most commonly affects. It describes signs of potential labour exploitation and explains what employees should do if they believe someone may be being exploited. The objective of the course is to ensure employees understand what modern slavery is and how hidden labour exploitation can occur in businesses; how to spot the signs of hidden labour exploitation and how to respond; and know what they can do to help.

In 2024, this training was reviewed, updated with some minor changes, and relaunched to the workforce as noted above, ensuring a refreshed level of awareness for these 311 employees. In addition, this audience was then utilised in cascading the concepts and learning through the implementation of toolbox talk sessions, which build awareness about this pivotal topic across the broader workforce.

Preparations have also commenced for an expansion of the target audience of the advanced online training module. The target audience will be increased to 542 individuals and leaders across Costa - those with significant responsibilities in the hiring, management and sourcing of people or

services. In addition, Costa is committed to building an additional avenue to bring essential training and knowledge to our workforce. Costa's implementation of a Human Capital Management system over 2025-2026 will allow for increased levels of provision and monitoring of training completion.

In Morocco, every worker receives training upon recruitment on topics such as discrimination, the ETI Base Code, which is an internationally recognised code of good labour practice, and how to raise concerns without fear of retaliation.

#### Online learning management system

A suite of other relevant courses is included in the online learning management system including Conflict of interest, Global Anti-bribery and Anti Corruption and Information Security Management, Discrimination and Equal Employment Opportunity (EEO). Safety at Costa, and Sexual Harassment Prevention.

#### Modern Slavery intranet page

A dedicated Modern Slavery intranet page with links to it features prominently on the Costa Intranet landing page. The site contains a range of information including training, definitions and explanations, working group members and links to relevant policies and documents. This site continues to be reviewed and updated to provide practical information and resources.

The People Assurance team has also developed an intranet site with a range of resources relating to audits.

#### Toolbox talks

Toolbox talks continue to be used widely across the business in Australia and our international operations to provide specific information to targeted groups of employees. They are generally delivered on site by the group's supervisor or leader, and a record kept of who has participated. They are used regularly for providing health and safety information as well as key information relating to modern slavery and associated human rights topics.

This enables us to extend our reach to employees who do not have access to our Online Learning Management System or direct Costa emails.

## CRITERIA 4: (cont)

The following toolbox talks are available to all sites to roll out to ensure our employees are aware of our policies and processes in relation to:

- Modern Slavery
- Forced Labour
- Bribery and Corruption
- Complaints and Grievances
- Whistleblower hotline
- Equal Opportunities, bullying and harassment

The Modern Slavery Toolbox Talk was refreshed and relaunched in January 2024.

### **In person training for first line managers and labour supervisors**

Following an earlier trial that was held in Tasmania with farm manager and labour leaders from the Costa Berry category, the Modern Slavery Working Group continues to explore other opportunities to increase access to training across the business.

Further development of virtual and/or face-to-face formats and delivery will be explored in 2025.

### **Whistleblower information**

All Costa sites, including in China and Morocco, display whistleblower posters. Whistleblower toolbox talks are available to all sites to ensure everyone is aware of the Costa Whistleblower Policy and Procedure and know when to raise concerns of suspected or actual misconduct.

### **Additional communication tools**

In addition to the communication outlined previously, Costa delivers a weekly news update to all Australian based employees once a week. This includes information and links relating to modern slavery and whistleblower information at selected points throughout the year.

## CRITERIA 5: Assessing the effectiveness of our actions

Costa continues to monitor the effectiveness of our actions, as outlined in this statement, and the broader activities across the business which impact human rights. The key mechanisms for this in 2024 were:

1. Governance
  - The Modern Slavery Working Group tracked progress against KPIs outlined in our 2024 Action Plan.
  - Costa policies are periodically reviewed and updated.
  - The Costa Executive receives periodic updates from the Modern Slavery Working Group and regular reports on matters including Ethical Sourcing, Workplace Health and Safety, People Assurance and the Pacific Australia Labor Mobility Scheme.
2. Risk Management

The Board has responsibility for oversight of the company's risk management. Costa also has a range of monitoring programs in place including supplier self-assessment questionnaires; supplier audits; site visits; accommodation audits; training participation; and work entitlements.
3. Grievance Mechanisms
  - Whistleblower Hotline
  - Contact Officer Network
  - Complaints Procedure





## CRITERIA 6: Consultation with subsidiary entities

Costa has developed a company wide approach to managing and mitigating the risks of modern slavery.

Our actions and this statement were developed in conjunction with the Modern Slavery Working Group with representatives from our Australian and international operations across the areas of procurement, human resources, legal, ethical sourcing and operations.

Representatives across the company have met during the reporting period as part of the development of our activities and this statement and discussed reporting requirements of the Modern Slavery Statement.

Through our Ethical Sourcing Program, members of the Modern Slavery Working Group worked closely with the different operational categories to help understand and ameliorate the specific labour risks that faced each category.

## CRITERIA 7: Additional information

Costa recognises that modern slavery in horticulture cannot be resolved in isolation. Collaboration and shared learning with like-minded businesses and organisations forms part of our approach.

Organisations which Costa has collaborated with include:

### **Be Slavery Free**

Be Slavery Free is an independent consultancy commissioned to complete a review of Costa's approach to modern slavery.

### **Stronger Together**

Stronger Together, founded in 2013, is a not-for-profit business led, multi stakeholder collaborative initiative whose vision is a world where all workers are recruited responsibly and have decent work free from exploitation.

### **Australian Fresh Produce Alliance**

Costa is a founding member of the Australian Fresh Produce Alliance, which continues to advocate for enhanced workforce policies including visa arrangements and incentives. AFPA supports the implementation of national labour hire licensing.

### **Citrus Australia and Berries Australia**

Costa is a member of Citrus Australia and Berries Australia, both of which have consistently supported the implementation of a national labour hire licensing scheme.

### **Fair Work Ombudsman's Horticulture Reference Group**

Costa is a member of this Reference Group, which includes representatives of horticulture industry associations, unions, retailers and employers.



## LOOKING AHEAD

We remain committed to a process of continuous improvement in response to modern slavery risks, across our Australian and international operations. In 2024, the Modern Slavery Working Group prepared recommendations following the external review of our Modern Slavery response, and these will be implemented in 2025. Our targets for 2025, which build on our existing Action Plan, are outlined here. This will enable us to continue to track and assess the effectiveness of our actions against modern slavery and maintain momentum in our efforts to ensure the rights of all our workers, and those within our supply chain, are protected.

Action	Target
Explore the use of an external provider to integrate worker voice survey mechanism into existing systems	Completion by end of 2025.
Embed KPIs for Senior Leadership roles aligned to Costa's Modern Slavery commitments	Implementation 2026.
% Australian Growers/ Suppliers on Sedex – or equivalent	100% direct growers 100% labour hire providers 100% of all other suppliers identified by Costa as higher risk <i>(Note: Due to change in suppliers and business acquisitions there may be periods this does not hit 100%)</i>
Advanced Awareness training for people in key roles	100% of people currently in key roles* have participated in Advanced Awareness training. Develop process for training harvest supervisors. Role specific training for individuals such as HR managers and rollout current training to first line leaders for all operational sites. Training to be refreshed on a biennial basis.
General awareness training and communication	Use additional tools or communication as required, including Toolbox Talks. General awareness communication to be provided to 100% of produce supply partners. Whistleblower hotline information available in local languages across 100% of sites. Explore use of video tools for modern slavery training.
Audits	10% of Australian grower sites audited within the 2025 reporting period.
All suppliers to the Australian business to be provided the Supplier Code of Conduct**	100%

\*Key role groups: Executive, Human Resources, Procurement and Legal and who have significant labour management and/or supervisory responsibilities. \*\* Excludes one time and irregular suppliers that are not registered as suppliers in SAP.



## STATEMENT APPROVAL

This Statement was approved by the Board of Costa Group Consolidated Holdings Pty Ltd on May 20, 2025.



Marc Werner  
CEO/Director



## APPENDIX A: List of subsidiaries of Costa Group Consolidated Holdings Pty Ltd

ACN 151 702 251 Pty Ltd  
 AgriExchange Pty Ltd  
 AgriExchange Farm Management Pty Ltd  
 AgriExchange Murtho Pty Ltd  
 BananaExchange Pty Ltd  
 Blueberry Investments Africa Pty Ltd  
 Blueberry Investments Morocco Pty Ltd  
 CBSP PtyLtd  
 Costa Group Consolidated Finance Pty Ltd  
 Costa Group Consolidated Pty Ltd  
 Costa Group Finance Pty Ltd  
 Costa Group Holdings Pty Ltd  
 Costa Group Holdings (Finance) Pty Ltd  
 Costa's Pty Ltd  
 Costa Asia Pty Ltd  
 Costa Berry Pty Ltd  
 Costa Berry Holdings Pty Ltd  
 Costa Berry International Pty Ltd  
 CostaExchange Pty Ltd  
 Costa Exchange Holdings Pty Ltd  
 Costa Farms Pty Ltd  
 Costa Fresh Logistics Pty Ltd  
 Costa Laos Pty Ltd  
 Costa Logistics Pty Ltd  
 East African Coffee Plantations Pty Ltd  
 Exchange Brisbane Pty Ltd  
 Exchange Innisfail Pty Ltd  
 FreshExchange Pty Ltd

FruitExpress Pty Ltd  
 Grape Exchange Pty Ltd  
 Grape Exchange Farming Pty Ltd  
 Grape Exchange Farming Mundubbera Pty Ltd  
 Grape Exchange Management Euston Pty Ltd  
 Hillston Investments Pty Ltd  
 Innisfail Holdings Pty Ltd  
 Mushroom Holdings Exchange Pty Ltd  
 MushroomExchange Pty Ltd  
 North Fresh Pty Ltd  
 Raspberry Fresh Pty Ltd  
 Tomato Exchange Pty Ltd  
 Vine Fresh Pty Ltd  
 Vitor Marketing Pty Ltd  
 Yandilla Park Pty Ltd

### International subsidiaries:

Costa (Dali) Agricultural Development Co Ltd  
 Costa (Mengzi) Agricultural Development Co Ltd  
 Costa Asia Ltd  
 Costa Berry Laos Sole Co Ltd  
 Costa China (Hong Kong) Ltd  
 Costa (Honghe) Fruit Planting Co. Ltd  
 Costa (Yunnan) Agricultural Development Co. Ltd  
 Costa (Baoshan) Agricultural Development Co Ltd  
 African Blue S.A.  
 Sweet Berry S.A.  
 African Blue (UK) PLC

## APPENDIX B: Mandatory Criteria

Mandatory Criteria	Page number
Identify the Reporting Entity	4
Describe the reporting entity's structure, operations and supply chains.	5-7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8-10
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	10-18
Describe how the reporting entity assesses the effectiveness of these actions.	19
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	20
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	20



