

2021/2022 Modern Slavery Statement

Harris Farm Markets (HFM) is committed to respecting human rights. In fact, this aligns to our mantra of being '**For the Greater Goodness**'. Our principles are to do business with integrity and fairness and with sustainability at the core. We aim to foster a culture of responsibility for compliance with human rights throughout our business, the supply chains we operate within and the communities we serve.



As part of our legal responsibilities under the *Modern Slavery Act 2018* (Cth), HFM has prepared the following statement to provide an update on our progress towards eliminating modern slavery in our operations and supply chain.

Summary of Harris Farm Markets' reporting requirements

Identity of reporting entity, entity structure, operations and supply chain: **Page 2-3**

Risks of modern slavery practices in the operations and supply chains of reporting entity and entities it owns or controls: **Appendix 3: Page 16**

Actions taken by reporting entity or controls to assess and address risks, including due diligence and remediation processes: **Page 4-10**

Effectiveness of actions taken: **Page 4-10**

Process of consultation with any entities the reporting entity owns or controls: **Nil required.**

Other relevant information: Future plans: **page 10-12.**

Structure, Operations and Supply Chains

Harris Farm Markets Pty Ltd.

Sydney Markets,

Flemington, NSW 2129

Main Reception: 02 9394 3111

A.C.N. 093 040 754

Registration date: 26/05/2000

Locality of registered office: SYDNEY NSW 2000

Structure:

OUR TEAM

Total Team Members: Approx: 3000

OUR SUPPLIERS

Total Current Suppliers or Vendors (both food and non-food): Approx: 2900

OUR LOCATIONS

Retail operations in New South Wales (NSW) and Queensland (QLD).

Procurement teams for fresh products, grocery and proteins (NSW and QLD)

Logistics and warehouse teams at 2 DC locations (NSW and QLD)

E-commerce teams in NSW and QLD.

Support teams in NSW and QLD.

Operations:

Harris Farm Markets is comprised of entities that undertake the following functions:

- Retail sales and service operations – including stores in NSW and QLD
- E-commerce – with one operational dark-store facility in NSW
- Private label product sourcing and manufacture – including HFM juices, salads and vegetables, cheese cutting and yoghurt
- Digital, IT, data and media – including our online social media, marketing and website presence
- Supply chain distribution and logistics – including our warehouses (in NSW and QLD)
- Property management and development – inclusive of our retail footprint and the identification, design and construction of new stores and support sites (e.g. warehouses and offices)

Supply Chain:

Our supply chain is diverse and complex, it varies across the different products we procure or make. HFM engage with large multinational and national manufacturers down to small, localised family businesses. This includes:

- HFM stores supply fresh, Australian produce wherever possible, importing only specific items not available in Australia due to seasonality or as supplementary stock. Our fresh produce procurement teams still 'walk-the-market' to select the items that go to stores each day.
- All HFM fresh meat is produced in Australia.
- HFM try to source groceries and other non-food items sold in our stores locally, with a focus on supporting social enterprises and small-medium businesses wherever possible.

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- Our supply chain includes more than one thousand vendors across food, liquor and household goods categories, as well as non-food supplies.
- HFM also provides wholesale fruit and vegetable produce to several small, independent food retailers. These are located largely in NSW.
- HFM engages a number of third-party vendors to manufacture and supply HFM-branded private label products for purchase in our bricks-and-mortar and online stores.
- Non-food vendors supply resources, goods and services that support our remaining operations including: IT software and hardware, building materials, transport and storage services, packaging and Personal, Protective Equipment consumables, cleaning services and supplies and marketing materials.
- HFM is responsible for the disposal of any unsold or non-saleable items from its retail and non-retail footprint, either through recycling programs, food waste, rescue and reuse and/or final disposal.

Our approach to human rights

In our 2020 Modern Slavery Statement, we outlined our *Human Rights Policy* and internal *Governance Framework* for identifying, addressing, and monitoring human rights risks and impacts across our value chain. The *Human Rights Policy* and *Governance Framework* can be found in *Appendix 1 and 2*. The *Framework* outlines the overall accountability, responsibility, management and identification of human rights and modern slavery risks. The highest order of responsibility for modern slavery issues vests with the Harris Farm Markets Board. Issues are highlighted to the Board via a regular, annual risk review process which is undertaken business wide (and includes the identification of any human rights or modern slavery related issues). Our business has evolved to include a newly formed role for a full-time Head of Sustainability to cover the management and monitoring of human rights and modern slavery issues.

The *Human Rights Policy* and *Governance Framework*, as well as Harris Farm's supporting Risk Assessment Process and approach to Mitigating and Remediating Risk (*Appendix 3 and 4*) outlined in Harris Farm's 2020 modern slavery statement all remain valid and in force.

Progress since 2020 statement

High-Risk Supplier Self-Assessment

At the end of 2021 Harris Farm requested all suppliers (those who are active vendors as of December 2021), including those within the High-Risk Categories (see *Appendix 3*), to provide evidence of their conformance (if required or in place) with Commonwealth requirements on modern slavery. In addition, suppliers were asked to outline any specific ethical supply chain practices undertaken (e.g., those considered outside of the *Modern Slavery Act* but important to our business, such as registration with SEDEX¹) and any other relevant food sourcing and food safety mechanisms adopted (e.g. support for Fairtrade sourcing, Hazard Analysis and Critical Control Point (HACCP) food safety certification, AUS-QUAL meat certification, etc.).

KEY CALL OUT

In total, Harris Farm requested more than five hundred suppliers² provide an outline and self-assessment on their adopted modern slavery practices. In our top ten suppliers for each of our seven core retail categories (fruit and vegetables, nuts, meat and protein, chilled items, bakery, ambient food, seafood) only 11 vendors were required to write annual modern slavery statements.³

It should be noted that several Harris Farm suppliers do not provide Harris Farm with products year-round or on a consistent or contracted basis. Harris Farm purchases fruit, vegetables and some protein products based on their seasonal availability, sometimes changing supplier

¹ SEDEX is a third-party ethical and responsible supply chain monitoring platform

² Several suppliers questioned in the self-assessment are not legislatively required to submit a formal Modern Slavery Statement since they do not meet the consolidated \$100m revenue threshold. Though, some provided their position on modern slavery or social activities, nonetheless.

³ As per above footnote. i.e., for the 70 top suppliers Harris Farm engages with only 11 were legislatively required to write a modern slavery statement. Demonstrating that less than ~20 per cent of suppliers have legislatively required to comply with the Modern Slavery Act.

or wholesale intermediary regularly. This makes it difficult for Harris Farm to request modern slavery information from some suppliers before time-of-transaction with the business.

ACTION FOR 2022/2023

ACTION 1

In the next 12 months Harris Farm will engage its top 10 long-term suppliers (i.e. they must be a business who has been supplying Harris Farm for more than 2-3 years) across its seven core retail categories (fruit and vegetables, nuts, meat and protein, chilled items, bakery, ambient food, seafood) and indirect procurement (e.g. office and warehouse supplies, cleaning providers, logistics providers etc.) functions to review their conformance with modern slavery requirements (if eligible).

ACTION 2

Select up to five suppliers from ACTION 1 to undertake a detailed desktop, supply chain assessment (including possible telephone or videoconference engagement) and consider the need for onsite audit (if necessary).

ACTION 3

Follow-up any remaining and current suppliers, who are required to comply and who have not yet provided a response to the supplier self-assessment request.

Fair Farms Certification

As a grocery retailer selling a high mix of fruit and vegetable products, Harris Farm works with several horticultural producers who are eligible to register for Fair Farms Certification⁴. Harris Farm suppliers who participate in the Fair Farms program are participating in a scheme with significant, mutual relevance to Harris Farms expectations. Suppliers who are certified Fair Farms did not need to undertake the self-assessment discussed above.

Vendor Voice

Harris Farm runs a 'Vendor Voice' communication and grievance service, for both direct and indirect suppliers to provide confidential, positive or negative feedback.

KEY CALL OUT

Since the inception of the *Vendor Voice*, Harris Farm has not received negative feedback through the service.

ACTION FOR 2022/2023

ACTION 4

Maintain the *Vendor Voice* service for direct and indirect suppliers to use. Add the *Vendor Voice* information to the Harris Farm Markets website for ease of accessibility.

ACTION 5

Re-communicate the *Vendor Voice* program to new suppliers (those on-boarded since December 2021) and still engaged or trading with Harris Farm.

⁴ *Fair Farms Certification supports the delivery of 'fair employment practices in the Australian Horticulture' industry. The Certification is overseen and delivered by Growcom, the Australian horticulture industry advocacy body.*

Vendor Assurance/Supplier On-Boarding

New suppliers are on-boarded to Harris Farm regularly. Suppliers are required to comply with Harris Farm's *Supplier Agreement Terms and Conditions*. Suppliers are also required to comply with Harris Farm's social and human rights expectations, which are outlined in Harris Farm's *New Supplier Form*. The *Form* requests a range of information including Quality Assurance specifications, Labelling and Packaging requirements, Responsibly Sourced Ingredients, Modern Slavery & Ethical Trade (see *Key Call Out* box below) and requires suppliers to include any specific environmental standards they adhere to.

KEY CALL OUT

Suppliers under (1):

By agreeing to become a supplier for Harris Farm Markets, you agree that:

- a) You will ensure safe working conditions for all staff and contractors, including safe working hours, adequate training, physical and mental health support.*
- b) You will ensure equitable working conditions for your staff and contractors, including no forced or illegal labour, no child labour, no inhumane treatment of employees, no discrimination*
- c) You pay a fair wage to your employees, in accordance with national fair work standards*
- d) You will strive to ensure that your ingredients are purchased at a price that supports primary producers, Australian or International*
- e) You will strive to procure ingredients from suppliers who do not condone Modern Slavery, as defined by the Modern Slavery Act 2018 (Cwlth), particularly in high-risk countries such as Asia.⁵*

Suppliers are required to agree to *Harris Farm's Supplier Agreement Terms and Conditions*, which includes

"10.4) ...1) comply with the [Harris Farm Markets] Supplier Code of Conduct, as amended from time to time; 2) comply with applicable Modern Slavery Laws;

10.5) Having made reasonable enquiries, to the best of its knowledge, the Supplier warrants that it, and its employees, have not been or are the subject of any investigation, inquiry or enforcement proceedings regarding any offence or alleged offence of any Modern Slavery Laws..."

Currently, once a supplier has been on-boarded, supplier information is stored in digital format. This includes specific documentation provided by a supplier throughout the on-boarding process (such as their Modern Slavery statement or Food Safety compliance).

Action for 2022/2023

ACTION 6

Review supplier on-boarding process and opportunities to create efficiencies and added due diligence alongside Harris Farm's software upgrades (e.g., ability of supplier to self-upload

⁵ In requesting compliance, Harris Farm does not require (eligible) suppliers to provide their physical Modern Slavery Statement (or similar) it is only requested that they acknowledge their willingness to comply and that, to the best of their knowledge, they are not creating any offences or participating in any proceedings related to Modern Slavery issues.

their modern slavery statement, etc.) and automate requests for updated supplied certifications/statement on expiry.

ACTION 7

As outlined in Action 2, undertake up to five desktop/telephone/in-person spot checks to audit compliance with self-assessment processes required by new suppliers.

Modern Slavery training

Since our previous statement, Harris Farm has conducted Modern Slavery training for those that interact most with high-risk supply chains. Training was conducted by an external facilitator.⁶ Training covered four key areas:

- 1) What is modern slavery and how it differs from other types or forms of exploitation
- 2) Introductions to the *Modern Slavery Act*
- 3) Risks and Indicators
- 4) Responding to Modern Slavery for businesses and how to conduct effective due diligence

Key Call Out

Harris Farm personnel who most interact with high-risk supply chains – such as our fresh fruit and vegetable buying team – were invited to participate in externally facilitated modern slavery training. In total, 24 Harris Farm staff participated in the training.

Action for 2022/2023

ACTION 8

Ensure that all new buying and executive staff undertake modern slavery training to ensure that as staff transition in and out of the business awareness on modern slavery risks and mitigation approaches.

In addition to this, consider how modern slavery training opportunities for all new staff which could be included in our staff on-boarding via our people management system *Dayforce*. This could be developed and facilitated by Harris Farm or via an external third-party.

Harris Farm staff clothing

This year, Harris Farm made the decision to switch clothing suppliers to a more environmentally sustainable and ethically sourced provider. The supplier operates facilities in Australia and undertakes production and manufacturing in China, Vietnam and Bangladesh.

Key Call Out

Harris Farm's new uniform supplier has undertaken the Modern Slavery and Trafficking Supplier Questionnaire⁷ as well as audited against the *Business Social Compliance Initiative*, *SA8000*, *WRAP World Responsible Apparel Production* and the *SEDEX SMETA*⁸. The provider has a zero-tolerance policy against any critical breaches and provides

⁶ The Australian Human Rights Commission was engaged to develop and undertake this training.

⁷ Harris Farm's uniform supplier is not required to report under the *Modern Slavery Act* since they don't meet the income threshold requirements.

⁸ Reference No: ZC412492837

remediation support to those with minor infringements. In addition to this, all the provider’s suppliers are also required to be compliance to SEDEX SMETA and SA8000⁹. The uniform supplier has a publicly available ethical sourcing strategy. The supplier has completed Harris Farm’s *New Supplier Form* outlined earlier in this statement.

The new uniform supplier also offers a Uniform Recycling Service ensuring that old uniforms are not sent to landfill.

The labour challenge in Australia and specifically in agriculture

The labour market in Australia has been stretched and unemployment numbers have dropped significantly. This means that employers are having to pay more for recruitment and retention of staff in their supply chains.

The Australian agricultural industry relies on overseas visa-holding staff to support some harvest and processing activities in the value chain. This reliance is particularly high in fruit picking and abattoirs. However, there was low to no immigration over the COVID-19 period demand for seasonal workers (those previously identified as most often at risk of modern slavery). This means that to ensure the productivity of their enterprises, most agricultural businesses are being compelled to increase pay rates to be able to secure staff. Harris Farm considers that this has been a natural, additional risk mitigant in our supply chain over the past 12-24 months.

B Corp Certification

Harris Farm has commenced work to assess requirements to achieve B Corp Certification. **A range of other activities were committed to in our previous statement. An update on those actions which were not yet ‘Complete’ is provided in Table 1.**

Table 1: remaining 2020 modern slavery statement actions

Focus Area	Actions	Update
Risk Management	Prioritise areas where Harris Farm has suppliers in high-risk areas and document a process to work through risk mitigation with suppliers in these areas using our control and influence where possible	To be actioned continuously as per our <u>Risk Assessment Process</u> and approach to <u>Mitigating and Remediating Risk</u> (see Appendices)
Corporate Policy	Join Fair Farms and encourage eligible suppliers to participate	Harris Farm has not joined Fair Farms, though is opening to re-evaluating participating in Fair Farms in the future.
Due Diligence	High-risk suppliers have additional due diligence undertaken throughout the Vendor Assurance / on-boarding process. This should include on-going monitoring.	Harris Farm has not implemented a specific due diligence check against high-risk industries. This will be addressed in 2022/2023 by ACTION 6 and 7 .
Reporting and Evaluation	Report and review modern slavery activity progress regularly	Harris Farm implement actions & reviewed its modern slavery progress in

⁹ SMETA: social auditing or workers in the supply chain. SA8000: audit for socially acceptable workplace practices.

		the development of this statement.
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Future Plans:

Harris Farm remains committed to delivering a program of continuous improvement when it comes to modern slavery. In addition to the above-mentioned actions, Harris Farm have outlined the following additional actions for consideration and implementation over the next 12 months (Table 2).

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Table 2: Additional actions Harris Farm will consider and implement in the proceeding 12 months.

Focus Area	Actions	Detail
Corporate policy	Update Human Rights Policy (if necessary)	ACTION 9: Review and update with any learnings from previous years.
Corporate Governance	Develop a process map for identify modern slavery risks in Harris Farm supply chain	ACTION 10: Develop a process and responsibilities map across the Harris Farm Markets value chain to identify where modern slavery risks lie across the different business areas of Harris Farm that will support the annual Risk Review undertaken by the HFM. ACTION 11: Use this to engage and communicate responsibilities to different business areas and create accountability. ACTION 12: Document these in Harris Farm document management system (WorkPlace)
Corporate policy	Food and Grocery Code of Conduct	ACTION 13: Investigate becoming a signatory to the Food and Grocery Code of Conduct.
Corporate Governance	Ensure modern slavery is embedded into regular senior leadership dialogues.	ACTION 14: Ensure modern slavery risks are monitored by Harris Farm Markets sustainability representatives and any changes to significant risks are escalated to the leadership team.
Communications and Education	Create Guidance Document for Staff	ACTION 15: Create an internal 'nutshell' guideline (and upload to WorkPlace) which includes criteria and processes for assessing modern slavery risks, including what should be asked of potential or current suppliers/vendors and expected responses. This should include guidance for staff and include definitions, examples and explanations on risks and can be linked to or integrated with existing supplier vetting processes regarding additives. This will include practical advice on where to go if issues are spotted or raised by our staff at all points across our business.
Corporate policy – internal procurement	Develop and adopt a Sustainable Procurement Policy	ACTION 16: Develop an overarching Procurement Policy for all indirect, internal procurement. This policy should outline appropriate procurement practices to ensure the Harris Farm is minimising its risk and exposure to modern slavery (amongst other sustainability or ESG criteria). ACTION 17: Establish Go/No Go's for evaluating potential new suppliers/vendors within the Procurement Policy (action 17).

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Remediation	Promote Remediation	ACTION 18: If any modern slavery remediation is undertaken throughout the reporting year, develop communications to share case studies of the successful remediation response from either a supplier that has been identified or has self-identified as having high exposure to or connection to modern slavery risk or outcomes.
Corporate process	Review Modern Slavery practices adopted	ACTION 19: Consider the need to review Harris Farm <u>Risk Assessment Process</u> and approach to <u>Mitigating and Remediating Risk</u> (<i>see appendices</i>)
Corporate process	Consider engaging with global monitoring platforms	ACTION 20: Consider engaging with a global supply chain monitoring platform such as SEDEX to better manage and understand modern slavery risks for global vendors plus have access to their global auditing capabilities.



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Board Approval

The Harris Farm Markets Modern Slavery Statement for 2021/22 has been approved on 13/12/2022.

Signed:

A handwritten signature in black ink, appearing to read "Tristan Harris", written over a horizontal line.

Date:

13-12-22

Name: Tristan Harris

Position: CEO and Director

Appendices

Appendix 1: Harris Farm Markets: Human Rights Policy

POL039 – Summary

Our Human Rights Policy is guided by the International Bill of Human Rights and the principles set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. This describes the human rights most relevant to Harris Farm operations and is a foundation Policy that underpins Harris Farm’s sustainable business.

Harris Farm has a zero-tolerance approach to all forms of human rights violations in its business, supply chain and local areas of operation. We are committed to supporting and respecting the protection of human rights and acknowledge that there is a risk of negative impacts on human rights through both our own business activities and businesses in our supply chains. We seek to prevent and mitigate adverse human rights impacts and will act with due diligence to ensure the rights of others are protected. We expect our suppliers and service providers to do the same.

We are committed to continuous improvement of our risk management processes, to deliver improved human rights to all participants in our business, be they customers, supplier workers, employees, contractors or local communities. Only by striving to improve will we break down the barriers to a better, more sustainable life for all.

Appendix 2: Harris Farm Modern Slavery Risk Governance Framework

Accountability

Harris Farm Board

Responsible for approving the annual Modern Slavery Statement
Responsible for monitoring and providing oversight for Human Rights due diligence

CEOs & Senior Leadership Team

Accountable for managing Human Rights risks & compliance with the HFM Modern Slavery statement across its business.

Sustainability

Assesses relevant ESG related supply chain risks - including modern slavery
Ensure Harris Farm Markets has effective mitigation strategies (such as due diligence and auditing monitoring programs) to address these supply chain risks

Finance & Quality Team Members

Manage Vendor Assurance activities, including vendor auditing, modern slavery statement use/compliance, etc.

Figure 1: Harris Farm Governance Mechanisms for Human Rights Related Risk Management

Appendix 3: 2020/2021 Modern Slavery Risk Identification

In our 2020 Modern Slavery Statement, we highlighted that we had identified 10 high risk categories across our business where suppliers or vendors may be exposing their employees to conditions of modern slavery. These were:

- Fruit and vegetables – with a focus on those grown in Australia, the USA, Mexico and New Zealand
- Groceries – with a focus on tinned tomatoes, wheat, eggs, coffee, cocoa and tea
- Rice – with a focus on rice produced in India
- Sugar – with a focus on sugar produced in Columbia
- Nuts – with a focus on nuts grown in Vietnam, Turkey, Bolivia and the Philippines
- Working uniforms – with a focus on those sourced from Australia and overseas
- Beef – with a focus on beef produced in Australia
- Poultry – with a focus on poultry produced in Australia
- Fish – with a focus on fish sourced from the USA, the UK and Indonesia

Risk Identification and Management Approach

At Harris Farm Markets we approach risk by leaning upon the principles of HACCP. These are:

1. Conduct risk analysis:
 - a. Identify the hazards
 - b. Decide who might be harmed and how
 - c. Evaluate the risks
2. Determine points of risk control – including mitigating processes: individual controls and control limits (what does good look like, how is it measured and reported upon)
3. Establish limits (what good looks like) including (procedures and 'nutshells' (HFM information guides for staff) in online/cloud-based document management system)
4. Establish monitoring/control systems
5. Establish corrective action – remediation activities including root cause analysis to determine why mitigation failed
6. Establish verification procedures
7. Establish documentation

Appendix 4: Harris Farm Markets – overall risk management indicators, mitigation, control examples etc.

Table 3: Types of risk and risk indicators

Type of risk	Indicators
<p><u>Indicators of modern slavery</u> A combination of these signs may indicate a person is in a situation of modern slavery and that further investigation and assessment is required.</p> <p>You should also consider that some groups may be at higher risk of being impacted by modern slavery, such as women and migrant workers.</p> <p>For example, women can be disproportionately impacted by modern slavery due to structural disadvantages, including lack of access to education.</p>	<p>The suspected victim or victims are:</p> <ul style="list-style-type: none"> • living at the workplace, or another place owned/controlled by their employer • underpaid or not paid at all • required to work excessive hours • confined or isolated in the workplace or only leave at odd times • guarded at work or in their accommodation • isolated in remote locations that are difficult to access and/or restricted from contacting or interacting with people outside the workplace (for example, their phones are confiscated, or they are supervised when in public) • managed by an intermediary/third party who ‘holds’ or ‘invests’ money for them • subject to different or less favourable working conditions than other workers because of their country of origin, gender or other factors • unable to terminate their employment at any time • appear to be servicing a debt to an employer or third party (e.g., recruitment agent) • appear to be subjected to, or threatened with, violence, emotional, sexual, verbal or physical abuse and/or degrading treatment in connection with their employment • appear to be subjected to intimidation, such as threats to their family or close relations in connection with their employment • appear to have false travel or personal documents and/or are not allowed access to these documents because they are being held by an employer or third party • appear to have been deceived about the conditions of their employment • are not provided with contracts in language/format that they can easily understand • are not informed of, or do not appear able to understand the terms and conditions of their employment • are not provided with any protective equipment, training or means to refuse to participate in dangerous work practices, or refuse to handle known toxic materials or hazards • do not have permission to work because they are from another country or appear to be working in breach of visa requirements
<p><u>Industry Risks</u> Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.</p>	<ul style="list-style-type: none"> • Unskilled, temporary or seasonal labour, short-term contracts and outsourcing. • Use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at night-time or in remote locations, such as security or cleaning. • Use of child labour in hazardous conditions, such as underground, with dangerous machinery or tools, in unhealthy environments (including where they are exposed to physical or sexual abuse), or for long hours.

Type of risk	Indicators
	<ul style="list-style-type: none"> Recruitment strategies by suppliers, their agents or labour hire agencies target specific individuals and groups from marginalised or disadvantaged communities.
<p><u>Product & service risks</u> Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.</p>	<ul style="list-style-type: none"> Price vs cost or delivery timeframes require suppliers to engage in excessive working hours, cost savings on labour hire or rapidly increase workforce size. Product/Service development/delivery reported to involve labour exploitation by international organisations or Non-Government Organisations (NGO). Children used in the development of the product or delivery of the service, e.g., carpet weaving. Product/components made in countries where there is a high risk of labour exploitation reported by international organisations or NGOs. Services are provided in countries where there is a high risk of labour exploitation reported by international organisations or NGOs. Product is made from materials or using services reported to involve a high risk of labour exploitation by international organisations or NGOs.
<p><u>Geographic risks</u> Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty. Several organisations issue public reports evaluating governance, corruption and rule of law in countries around the world. You can use these reports to identify higher risk countries for modern slavery.</p>	<ul style="list-style-type: none"> Locale has not ratified international conventions relevant to modern slavery, such as: the International Convention to Suppress the Slave Trade and Slavery (1926); ILO Convention (No. 29) concerning Forced or Compulsory Labour (1930); the Supplementary Convention on the Abolition of Slavery, the Slave Trade and Practices similar to Slavery (1956); the Protocol to Suppress, Prevent and Punish Trafficking in Persons, Especially Women and Children (2000); ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (1999). Country reported to have a high prevalence of modern slavery or labour rights violations, other human rights violations and/or child labour by international organisations or NGOs. Community has inadequate protections for workers, including no or weak capacity to effectively monitor workplace standards and enforce compliance with national standards. Law enforcement agencies are reported to be hostile to workers in at risk industries. The country forces parts of the population to work for development purposes, for example to assist in construction or agriculture. The country is reported to have weak rule of law by international organisations/NGOs, including due to corruption, conflict, political instability. The country has a high prevalence of people who are vulnerable to exploitation because they are impoverished, displaced or subject to severe discrimination
<p><u>Entity risks</u> Some entities may have modern slavery risks because they have poor governance structures, a record of treating workers</p>	<ul style="list-style-type: none"> Entity has previously been reported as noncompliant with human rights or labour standards, including by media or NGO sources. Procurement and sourcing processes are poorly managed or inefficient. Entity has complex or opaque supply chains.

Type of risk	Indicators
poorly or a track record of human rights violations.	<ul style="list-style-type: none"> Workers appear to have little information about workplace entitlements and protections and there is a general lack of information about workplace standards. Audit results for the entity appear unreliable or conflict with other sources of information about the supplier, such as NGO reports. Staff recruitment costs by labour hire companies or recruiters are not covered by the company, meaning that recruitment expenses such as travel may be improperly imposed on workers. Entity provides residential care for children overseas.

Table 4: Risk Assessment - sources of potential risk and examples of mitigating actions

Type of Human Right	Description	Example of Mitigation Action
Modern Slavery	Serious exploitation, where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom.	Assessment of vendors or Fair Farms Certification to check: <i>Use of foreign workers on farms that supply Harris Farm do not allow onerous conditions that restrict workers' ability to leave by holding their visa obligations/ document possession as a negotiating tool to favour the grower's needs.</i>
Child labour / minimum age workers / worst forms of child labour	The internationally recognised minimum age for work is 15 years (13 for light work) and 18 years for hazardous work). In NSW, there is no minimum age. This varies per state in Australia. The worst forms of child labour include exploitation through any form of slavery or practices like slavery, i.e., debt bondage and forced or compulsory labour, sexual exploitation or drug trafficking; and work which is likely to harm the health, safety or morals of children. A child is considered as underage of 18.	Assessment of vendors or Fair Farms Certification to check <i>use of child labour in hazardous conditions, such as dangerous manufacturing or farm machinery, in unhealthy environments or for long hours at produce growers.</i>
Forced / bonded / compulsory labour	Forced labour occurs when the person cannot voluntarily cease working or leave their place of work. Bonded labour occurs when the person's services are provided as security for a debt; where the debt is excessive to the length or nature of work, or the services are not applied to fulfill the debt.	Assessment of vendors or Fair Farms Certification to check: <i>no long hours, onerous or poor working conditions for foreign workers employed as seasonal labour to pick fruit in remote locations supplying Harris Farm. Seasonal workers on a working holiday (subclass 417) visa where they are required to fulfil visa obligations through remote work in Australia.</i>
Indigenous and tribal people	Respect to Indigenous and tribal people for their needs and desires. Access to their fundamental rights relating to their customs and traditions, land rights, the use of natural resources found on traditional lands, employment, vocational training, handicrafts and rural industries, social security and health, education, and cross-border contacts and communication.	Vendor Assurance to check: <i>Harris Farm supply chain producers do not encroach or affect traditional lands with their farming practices, without consultation with the local tribal elders.</i>

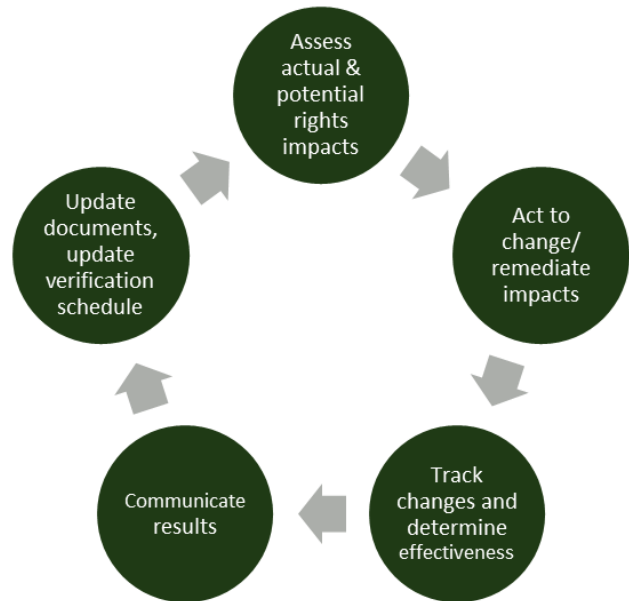
Type of Human Right	Description	Example of Mitigation Action
Non-discrimination	Equal opportunity and treatment relating to employment or occupation regardless of race, skin colour, sex, religion, beliefs, political opinion, ethnicity or social origin.	Recruitment activities by Harris Farm and suppliers/service providers target individuals/groups from disadvantaged communities for manufacturing roles and cleaning services.
No harsh or degrading treatment / harassment / bullying	When a person or group of people repeatedly act unreasonably towards an individual/group of workers, creating a risk to health and safety.	Employee protection via cultural training for all staff, Employee Support programs, Stakeholder Grievance programs, Whistle-blower programs
Health and safety	Employees have the right to be protected from sickness, disease and injury arising from their employment.	Harris Farm provide personal protective equipment and WHS training to minimise the potential impact of injury or disease.
Working conditions - including working hours	Working conditions to be observed include regulated hours of work, weekly rest periods, annual holidays, night work and part-time work.	Creation of extra support processes: in extended & busy holiday periods request employees to work extended hours with reduced break times.
Fair wages / compensation	Workers are entitled to a regular payment of wages, the protection of wages in the event of the insolvency and guaranteed minimum wages.	Assessment of vendors or /Fair Farms Certification to check: rural growers supplying Harris farm: Pay minimum wage for seasonal labour, instead of using piece-meal picking employment conditions.
Freedom of association / collective bargaining / right to strike	The right to organise and form workers' organisations allows for fair collective bargaining. Collective bargaining ensures that both employers and employees have an equal voice and that outcomes are fair and equitable.	Assessment of vendors or /Fair Farms Certification to check: free and fair access to union representation within supplier and service provision stakeholders.
Equality	Equal remuneration regardless of gender identification for work of equal value. Where remuneration includes ordinary or minimum wage or salary & any additional benefits payable to employee resulting from employment.	Harris Farm gap analysis of female worker earnings in comparison with male colleagues performing the same work and action plan to mitigate any gaps discovered.
Accessibility for persons with disabilities	Accessibility is where the needs of people with disabilities are specifically considered. Where products, services, and facilities are built or modified so that they can be used by people of all abilities.	Compliance audits by HR team: <i>Floor spaces and aisles are free of equipment and other barriers.</i> Property Team: <i>Design choices for property include accessible car parks close to shop entrances with sufficient space for mobility devices, compliance with building requirement for accessibility</i>
Maternity protection	Maternity protection includes, but are not limited to: <ul style="list-style-type: none"> • Pregnant women and nursing mothers are not obliged to perform work which may be harmful to their health or their child. • Entitlement to a cash benefit that allows them to maintain themselves and their child to a suitable healthy, living standard. • Protection against discrimination based on maternity, including the prohibition of terminating employment of a woman during pregnancy, maternity leave, or 	Equal Opportunity Policy audit: <i>Comparison of position placements before and after maternity leave for compliance, with retraining and adjustments to meet criteria where nonconformances found.</i>

Type of Human Right	Description	Example of Mitigation Action
	<p>during period following her return to work, except on grounds unrelated to pregnancy, childbirth etc.</p> <ul style="list-style-type: none"> Women returning to work must return to the same or an equivalent position paid at the same rate. 	

Controls to assess and address risks, including due diligence and remediation processes

Remediation

Where a risk of modern slavery is identified, Harris Farm will provide education, resources and support to staff, suppliers, and service providers to address the impacts and determine controls. Support will also be provided to assist local communities and third parties to address negative impacts as appropriate. Remediation activities are determined by the risk outcome and documented as corrective action in the risk assessment. This could include more intense/frequent verification activities or even termination of suppliers, subcontractors, and service providers dependent on significance of findings and capability of effectively managing the risk long term.



Due diligence

Modern slavery risk points are monitored by our Head of Sustainability. The Finance and Quality team schedule and vendor on-boarding. They will work with the Head of Sustainability to mitigate/mediate non-compliance, and report activities to the Senior Leadership team. Non-conformance results are reported immediately to the Senior Leadership Team.