

# 2023 Modern Slavery Statement

RETAIL  
FOOD  
GROUP

# Introduction

This Modern Slavery Statement has been prepared by Retail Food Group Limited ACN 106 840 082 (RFG) and its subsidiaries (together, the Group) in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*

RFG is a global food and beverage company headquartered in Queensland. It is Australia’s largest multi-brand retail food franchise manager and the owner of various and iconic retail food brands. RFG is also a roaster and supplier of high-quality coffee products.

This statement identifies the steps taken by the Group during the financial year ending 30 June 2023 (FY23) to address modern slavery risks within its operations and supply chain. Where relevant, information concerning steps taken since 30 June 2023 is also provided.

Each Group member maintains its registered office at Level 11, 2 Corporate Court, Bundall Qld 4217, and its principal place of business at Level 4, 35 Robina Town Centre Drive, Robina Qld 4226. Further information concerning RFG may be found on our website at [www.rfg.com.au](http://www.rfg.com.au).

We recognize the important role all businesses can play in influencing change within the environments and communities in which they operate.

During FY23 we built upon the foundational platform established in prior periods to create an Environmental, Social and Governance (ESG) framework that provides a clear ‘north star’ to guide the future development of sustainability initiatives within our business. Incorporating a commitment to ‘inspiring towards a healthy and prosperous planet and people’, our framework is underpinned by five key pillars:



Environmental protection and resource conservation



Responsible sourcing and care for our environment



Excellence in well-being across our people



Healthier customers, healthier communities



Ensuring a prosperous RFG

The second and third pillars of our framework are particularly relevant to this statement.

We are aware of the impact our sourcing decisions have on people and planet both within the markets we operate in, and amongst international supply chains, particularly coffee. Additionally, we understand our responsibility to care for our employees, Franchise Partners and their people.

By extension, we support every individual’s right to live and work freely and oppose all forms of modern slavery. We also acknowledge the role we can play in positively contributing to the reduction and ultimate elimination of modern slavery practices. This acknowledgment is built into our broader governance framework which incorporates a commitment to foster a culture of ethical behaviour and social responsibility, and recognizes an opportunity for us to ignite the power of collaboration to influence all around us for a better planet, people and profit.



# Our Structure, Operations & Supply Chain

RFG is listed on the Australian Securities Exchange (ASX) and headquartered in Queensland. We are Australia's largest multi-brand retail food and beverage franchise owner with a portfolio of brands including:



We are also a roaster and supplier of high-quality coffee products under the Di Bella Coffee brand.

As at 30 June 2023:

Our portfolio included

**10**

BRANDS

Which were represented in

**33**

COUNTRIES

Our global network comprised

c. **1300**

TRADING OUTLETS

In Australia, our network generated

**>\$500m**

NETWORK SALES

and included estimated employees of

**6800**



We directly employed 549 team members as at 30 June 2023

**RETAIL  
FOOD  
GROUP**

# Our Domestic Operations

We directly operated 31 corporate outlets as at 30 June 2023, with the vast majority of domestic outlets (both fixed, mobile and virtual units) owned and operated by independent Franchise Partners who are responsible for the day-to-day operation of their business.

Our national support office is based in Robina, Queensland, and our coffee roasting facility is situated in Castle Hill, NSW. We also maintain a dedicated training facility in Mermaid Beach, Qld, and regional offices in Brisbane, Qld, and Chicago, USA.

As at 30 June 2023, we had:

**179**

**SUPPORT  
OFFICE & FIELD  
TEAM MEMBERS**

**359**

**RETAIL TEAM  
MEMBERS**

**11**

**INTERNATIONAL  
TEAM MEMBERS**

Our supply chain currently spans c.750 supply partners. Of these, the core suppliers to our network are within the food and beverages sector or provide distribution services, packaging goods, professional services or, in the case of our wholesale coffee operations, provide green coffee beans and related products.

We co-ordinate the core supply chain for our domestic franchise network, sourcing and specifying key products and ingredients which we approve for use or sale within franchised businesses or corporate stores. This is to ensure the quality and consistency of our core products and suppliers throughout each of our brand networks.

The supply of more generic products to our franchise network is not coordinated through us (noting also that our franchise agreements provide Franchise Partners scope to seek approval of alternative products and suppliers). These indirect supply arrangements are between our Franchise Partners and their own suppliers, or via our nominated distributors, and consequently, we do not have complete visibility in relation to these arrangements.

We also supply coffee and ancillary products to our franchise network via our Di Bella Coffee business. During FY23, Di Bella Coffee also roasted and supplied quality coffee and allied products to independent foodservice and QSR channels.



*Above: Our coffee roasting plant situated in Castle Hill, NSW*

# Our International Operations

Our franchise brand systems are represented in over 30 countries across the globe.

Save for the USA, our international network is operated by Master Franchise Partners who have been granted the right or licence to establish and operate retail outlets, or to grant sub-franchises to subfranchisees to establish and operate retail outlets, identified with brands owned by the Group.

In the USA, we operate (via a subsidiary) as franchisor, and franchised outlets are owned and operated by Franchise Partners, consistent with our domestic operations.

While we do not maintain a physical presence within master franchised territories, we do maintain a regional support office in Chicago, USA, where we employ 10 team members. A further team member was based in New Zealand<sup>(1)</sup>.

While we supply, or arrange for the supply, to our international network of certain key products (principally coffee and ancillary products through our Di Bella Coffee business), our Master Franchise Partners are responsible for:

- Either personally, or through their sub-franchisees, the day-to-day operation of outlets within their licensed territory
- Establishing and maintaining the supply chain which services their licensed territory with goods or services necessary to enable the proper and efficient operation of retail outlets consistent with our brand system standards
- Appointing reputable customs agents, freight forwarders, distributors, suppliers and other service providers necessary to maintain the supply chain within their licensed territory

Whilst our Master Franchise Partners and their sub-franchisees do not form part of the legal entities which comprise the Group, we acknowledge the potential for there to be risks linked to modern slavery within their operations or through their supply chains (to the extent we do not manage them). In recognition of this risk, in 2021 we updated our Master Franchise Agreements to require our Master Franchise Partners to respectively address modern slavery risks, including a commitment to comply with our Policy Regarding Modern Slavery Practices.



# Modern Slavery Risks in Our Operations & Supply Chain

We work with some of Australia's most iconic and recognizable manufacturing brands. Across our domestic footprint, we partner with suppliers that are leaders in their own spaces, chosen for their innovative approach to retail and product design as well as their approach to food safety, risk management and ethical business relationship management.

Having regard to this, we have also reviewed our operations and supply chain, together with the products, services and activities of our supply partners and how they may potentially contribute to modern slavery practices, in order to identify possible modern slavery risks relevant thereto.

We acknowledge that modern slavery risks are more likely to be more pronounced amongst some aspects of the Group's supply chain and operations due to the geographic location of some suppliers, the products in question, or the original upstream source of materials and ingredients supplied to us (or our Franchise Partners or Master Franchise Partners).

We recognize that supply chains within the food, beverages and paper products sectors may generally have inherently higher risks of modern slavery due to the nature of the work necessary in the production, processing, packaging and transport of these products. This is particularly the case where labour is generated overseas and or via seasonal, low-skilled labour. We also recognize it may be difficult to detect the existence of modern slavery practices, particularly in connection with products or services outside of our core product or service requirements.

In particular, we have identified the sourcing of green coffee beans by our coffee business from upstream sources that originate in countries such as Brazil, Colombia, Kenya and Nicaragua, as carrying heightened risk in connection with modern slavery practices having regard to their geographic regions and socio-economic factors, both of which may facilitate or incentivize those practices.

Our food, beverage and packaging suppliers represent the largest category of supplier spend within our franchise network. The indirect supply chain from which these items originate includes the farms or plantations on which raw materials are grown, the factories which process these materials, and the transportation services involved in the supply chain.

Our supply chain sources from a range of locations, however, the majority of 'spend' is sourced from Australian based suppliers or distributors. We do however recognize that our supply partners source goods from overseas.

Whereas we have a more advanced understanding of the potential risk of modern slavery practices within our core supply chain, we acknowledge that, at this stage, our visibility in relation to non-core, or indirect, supply chains can be enhanced for future reporting periods.



# Our Supply Chain

Relevant categories of products or services incorporated within our supply chain include:

## Key Product Categories

- Food and beverage products (including ingredients)
- Packaging and related products
- Distribution services
- Uniform providers
- Equipment and shopfit services

## Other Service/Product Categories

- Suppliers of retail and commercial premises
- Project management services
- Marketing related services
- Information and technology related services
- Professional advisory services

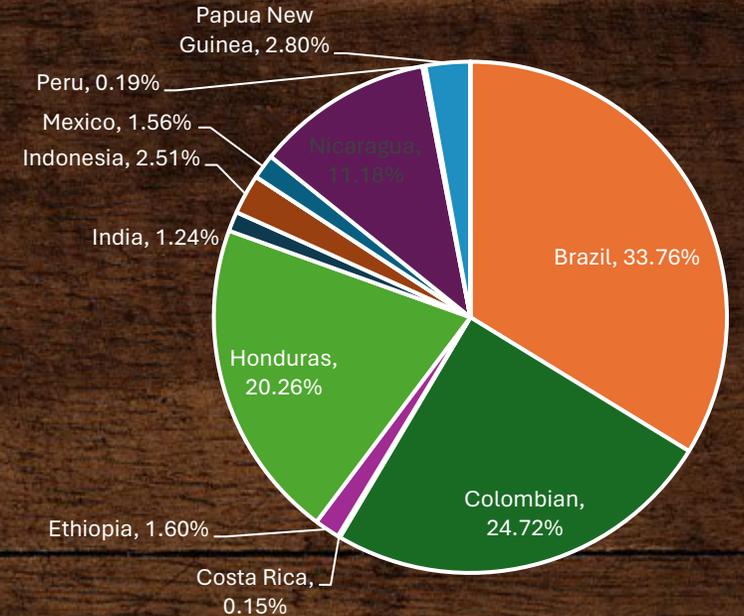
We have identified that the areas with the lowest risk of exposure to modern slavery to be our own operations and support office activities, which are predominantly conducted by staff directly employed by us.

More broadly, in addition to the high-level assessment undertaken amongst our key suppliers in past periods (who represent the overwhelming majority of 'spend' amongst our network), which incorporated the dissemination to, and completion by, these suppliers of a targeted Self-Assessment Questionnaire regarding the risks of modern slavery in their business and supply chain (certified by an authorized representative), during FY23 we procured membership of SEDEX, one of the world's largest online platforms for the collection and sharing of ethical supply chain information.

The information and materials available via the SEDEX platform has assisted to inform assessment of modern slavery risk amongst our supply chain.

The largest risk amongst our supply chain relates to coffee. Di Bella Coffee, whose operations incorporate the importation and transportation of green and roasted coffee and related products such as teas, syrups, brewing equipment and tools, relies upon a supply chain which includes direct suppliers, together with indirect suppliers such as foreign plantations where coffee and tea are produced or processed, and the factories where equipment is manufactured.

The following graph details green coffee bean origins used in our business during FY23 (these regions may fluctuate between reporting periods depending on our stockholdings, the availability of green beans and relevant pricing considerations):



# Green Coffee

Having regard to the graph provided in the preceding page, and informed by information derived from both the SEDEX platform and our Rainforest Alliance certification program, we have assessed modern slavery risks exist in connection with green coffee sourced from the following international regions:

	 FY23 % Share	 Forced Labour	 Child Labour
BRAZIL	33.76%	High Risk	Medium Risk
COLOMBIA	24.72%	Medium Risk	Medium Risk
COSTA RICA	0.15%	Medium Risk	Medium Risk
ETHIOPIA	1.60%	Medium Risk	High Risk
HONDURAS	20.26%	Medium Risk	High Risk
INDIA	1.24%	Medium Risk	Medium Risk
INDONESIA	2.51%	Medium Risk	Medium Risk
KENYA	0.01%	Medium Risk	Medium Risk
MEXICO	1.56%	Medium Risk	Medium Risk
NICARAGUA	11.18%	Medium Risk	Medium Risk
PERU	0.19%	Medium Risk	Medium Risk
PNG	2.80%	No Data	No Data

*These risks have informed & driven our commitment to migrating our green coffee bean requirements to certified coffee*

# Actions Taken to Assess & Address Risk

As part of our broader approach to sustainability, we acknowledge the important role we can play in positively investing in and contributing to the responsible management, measurement and minimization of the environmental and social impact of our business and supply chain. We acknowledge that this role extends to positively contributing to the reduction and ultimate elimination of modern slavery practices.

During prior periods we augmented our governance and resourcing to better drive more sustainable outcomes and strategies for our business and supply chain. This included:

- The establishment of a Sustainability Committee to oversee new systems and controls that will enable us to play a more constructive role in contributing to the development of a more socially responsible business and supply chain
- The appointment of a dedicated Sustainability Manager to implement and champion those systems and controls

Our Sustainability Committee has been provided a mandate, and is motivated, to enhance the Group's broader corporate social responsibility practices and impact on the communities in which it operates.

The Committee has engaged with appropriate organizational representatives within the Group's national support office, coffee roasting business and field team to frame a broad-based approach to identifying scope for change or new initiatives targeting improved sustainability within our business.

This activity has included the conduct of our first materiality assessment in connection with ESG matters in order to identify those topics most important to our business and stakeholders, and to inform development of our ESG framework, which was established during FY23. This assessment identified opportunities for us to enhance our approach to, including among other things:

- Training in connection with modern slavery risks
- Supply partner assessment, selection and onboarding
- Driving enhanced sustainable sourcing and improving green coffee bean traceability standards

These opportunities informed a number of decisions taken in FY22 and implemented during the reporting period (FY23), including the Group's procurement of SEDEX membership as noted previously, redesign of our approach to supply partner management, and proactive steps to improve the certification standards of green coffee beans used in our coffee roasting business.

In 2021 we also adopted our Policy on Modern Slavery Practices, a copy of which is available on our website, which records our opposition to all forms of modern slavery and our commitment to reducing the risk of it occurring within our business and supply chain.

This policy forms part of a broader governance framework which includes our:

- Code of Conduct
- Anti-Bribery & Corruption Policy
- Whistleblower Policy
- Diversity Policy
- Workplace Bullying Policy
- Grievance Policy
- Competition & Consumer Law Policy

We also provided modern slavery related training to relevant members of our internal team during FY23.

# Supply Partner Relationships

We maintain an expectation that our supply partners share our opposition to modern slavery. That expectation has driven a number of initiatives which continue to be observed or enhanced within our business.

This includes the use of supply agreements which require our supply partners to comply with applicable modern slavery laws, our Policy Regarding Modern Slavery Practices, and our Supply Partner Code of Conduct (Code).

Our Code clearly sets our expectations for our supply partners so they can help us source goods and services in a responsible, sustainable and fair way. A non-negotiable element for all new supply arrangements, our Code covers topics including:

- Supply partner governance and risk management
- Labour and human rights (including an expectation that our supply partners share our support for every individual's right to live and work freely, and to strive to reduce or eliminate modern slavery risks within their own supply chains)
- Health and safety
- Environmental sustainability

Our Code also incorporates an expectation that our supply partners strive to continue to improve their business operations and to exceed the minimum requirements outlined in our Code.

During FY23 our Code was updated to include a variety of changes, including provisions to more closely align our relationship with supply partners via the SEDEX platform.



# SEDEX & Supply Partner Onboarding/Management

SEDEX provides ethical trade tools and services to improve responsible sourcing practices within supply chains. It provides risk assessments across the pillars of labour, health and safety, environment, and business ethics, has operated for c.20 years, and has almost 75,000 members across 180 countries<sup>(1)</sup>.

Leveraging our SEDEX membership enables us to gain greater transparency more quickly in connection with our supply chain risks and, moving forward, our focus is on connecting with supply partners we've classified into categories based on inherent risk, or with those that we have significant 'spend' with.

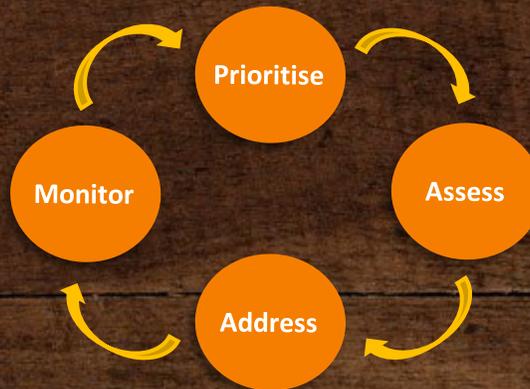
By inviting these supply partners to connect with SEDEX, complete a self-assessment questionnaire (SAQ) as a minimum, and preferably share their full two or four pillar SMETA (SEDEX Members Ethical Trade Audit) results, we can collect relevant insights across four key areas: labour standards, health and safety, business ethics and environment.

By 30 June 2023 we had initiated and linked 16 key suppliers spanning 28 supplier site locations with SEDEX relationships, including visibility to certain auditing and remedial activity.

We expect to finalise a further 41 supplier connections, spanning 67 site locations, by the end of calendar year 2023.

These connections, together with ongoing visibility of SMETA results and corrective action reporting continue to support our strategy of Prioritising, Assessing, Addressing and Monitoring:

This evolving visibility over how our supply partners are managing their ESG responsibilities continues to enhance our modern slavery compliance approach, facilitating data and insight collection. Topics are brought to the fore during supplier business reviews and discussed with our procurement team, allowing us to concentrate on making improvements using our Prioritise, Assess, Address and Monitor principles, further details in respect to which are provided overleaf.



# Prioritise, Assess, Address, Monitor

Our Prioritise, Assess, Address and Monitor principles incorporate the following:

## *Prioritise:*

Prioritisation informs those categories of purchase where risk is highest. Based on SEDEX radar risk ratings and our own assessments, some of these categories include coffee, tea, sugar and cocoa. Whilst indirect supply chain may be at play amongst these categories, and upstream visibility can be poor, especially beyond international borders, these represent products from locations or industries where the risk of modern slavery practices is most prevalent. Ultimately, prioritization will inform the sequence in which supply partners will be engaged consistent with the remaining principles discussed below.

## *Assess:*

This step requires engagement and communication with supply partners to assess and review risk outcomes and develop action and audit plans based on those outcomes.

We are motivated to evolve this element of our process to incorporate more detailed supply partner risk assessment methodologies, including the issue of SAQs (Self Assessment Questionnaires) and modification of our tendering pre-qualification requirements to include initial assessment documentation.

Modern slavery risk assessment will be informed by location and the nature of work (eg manual, transient, low skill, intensity), and at a supplier level, the scope and quality of controls, review and governance established. During FY23 we began leveraging publicly available information on country and industry risks, together with requiring prospective and existing suppliers to engage with us via SEDEX, which allows us to screen category risks, access pre-existing SAQs and supplier information, issue SAQs, and better monitor and manage progress of audit actions and improve reporting.

## *Address:*

Leveraging strategic importance in supplier relationships to determine supplier specific approaches, and apply the controls deemed necessary to mitigate or remove real or perceived risk where identified.

The first lever of risk control and mitigation represents the risk-level discussion raised with relevant suppliers together with an awareness of the expectations we will place on them. In addition, scope exists for implementing proportionate controls to mitigate probability of occurrence and consequential impacts. These might include provision of a supplier's modern slavery statement, active acknowledgement of and commitment to our Code, and embedment of our modern slavery risk expectations in supply agreements.

We are further motivated to evolve our processes:

- For medium to higher risk categories, to procure supplier commitment to self-fund and complete registration and onboarding on SEDEX, to respond to our SAQ requirements, and to complete reasonable potential subsequent actions
- For higher risk categories, to procure supplier commitment to completion of an SAQ and SMETA refresh on a 24 month basis, together with rectification of audit action outcomes.

## *Monitor:*

This principle contemplates ongoing due diligence across our supply chain, motivation to undertake wider SMETA programs with key or high risk suppliers if required, and reinforcing our commitment to SEDEX membership.

As we further develop our Prioritise, Assess, Address and Monitor framework, we will continue to work closely with our stakeholders and partners to build a timeline of activities, reporting formats and action-orientated procurement activities that align with best practice. Whilst we acknowledge work remains to be done, we've an ambition to lead the field in Australian retail and franchise services in terms of a safe, secure and responsible supply chain and related operations.

# Franchise & Master Franchise Partners

We continue to utilize Franchise Agreements and Master Franchise Agreements that expressly require compliance with modern slavery laws, employment laws, and our Policy Regarding Modern Slavery Practices.

We have also implemented a range of measures for our domestic network to assist our Franchise Partners to comply with their obligations as employers. This includes the provision of education and resources, access to third party subject matter experts (membership of the National Retail Association) and a wage compliance audit framework that assesses Franchise Partner compliance with relevant Awards and employment law requirements.

Our audit framework incorporates a requirement that Franchise Partners complete a compliance questionnaire which, among other things, better informs us of the potential for modern slavery risks within their business. Audits are carried out regularly by our auditors, who have been given the necessary authority to inspect Franchise Partner employee records and engage with Franchise Partner team members.

Over 140 wage compliance audits were initiated during FY23, and over 1,100 audits have been initiated since we commenced this process in FY17.



# Green Coffee

Having regard to the environment and social risks associated with the production of green coffee, we have been motivated to evolve our approach to green coffee bean sourcing.

During FY20 we rationalized our green bean coffee suppliers to reputable third parties, and in FY21, we further refined our green coffee bean sourcing principles.

These steps informed a commitment to migrate our green coffee bean requirements to certified coffee, and in FY22, we purchased 75% of our domestic green coffee requirements as certified coffee.

During FY23 we have maintained the trajectory of our green coffee bean sourcing initiative. During this period, we expanded our existing partnership with Rainforest Alliance, which has contributed to 96.1% of our green coffee bean requirements for our domestic business being Rainforest Alliance Certified Coffee. This outcome establishes Di Bella Coffee as one of Australia's largest buyers of certified coffee.

The Rainforest Alliance standard has four key themes which focus on the prevention of deforestation, improving farmer livelihoods, improving climate resilience, and advancing the human rights of rural communities. The Rainforest Alliance standard operates on an 'assess and address' basis, which requires certificate holders to establish internal committees responsible for assessing and mitigating human rights violations. The committee's role includes monitoring the farm or farming group for violations, and it has access to training to remediate issues if identified.



Previously we set a goal to transition the entirety of our global green coffee requirements to certified coffee by the end of FY24. Whilst we remain motivated to achieve this outcome, given the increasing global demand for certified coffee we have modified our expectations. We anticipate our Australian operations' FY24 green coffee bean requirements will continue to be fulfilled by >95% certified coffee.

We also remain committed to further improving our green coffee bean sourcing standards across the entirety of our global operations. In this respect, during FY23 we commenced work with our international roasting partners to transition our international coffee range to Rainforest Alliance certified coffee, however, supply constraints have delayed progress.

During FY24 we will continue to work with our partners to transition green coffee requirements to Rainforest Alliance certified coffee. Where this is not possible, we will look to partner with reputable suppliers and certification bodies to ensure our standards are maintained.

# Assessing the Effectiveness of our Actions

We have assessed the effectiveness of our response to modern slavery risks, and the initiatives implemented in FY23 and prior reporting periods, across three key performance areas:

- Our operations – with a focus on our team members
- Our supply chain – through our procurement team and coffee division personnel
- Our Franchise Partners – via the wage compliance framework referenced above

We also remain committed to the further development of enhanced assessment processes and supply partner selection criteria, facilitated by our internal procurement teams and guided by our governance framework. This includes investment in our procurement function during calendar year 2023 to effectively double our ‘buiside’ team, and transitioning SEDEX conversations and updates with our supply partner complement to a more regimented program. This ongoing evolution of connectivity and visibility drives improved visibility of modern slavery risk within our operations and supply chain, the identification of circumstances which may require more rigorous monitoring, and ongoing activity to audit and verify information.



# Our Operations, Supply Chain & Franchise Partners

## *Our Operations:*

In addition to requiring full compliance with our broader policy framework, we require all new team members to expressly acknowledge our Policy Regarding Modern Slavery Practices prior to commencing employment with the Group. Our policy forms part of our online intranet platform and is a key part of our essential employee policy framework.

As part of the support structure provided to our team, all team members are offered and have available to them a number of programs, including our Employee Assistance Program (provided in partnership with Drake Wellbeing), health and wellbeing programs, education assistance and corporate learning and development programs (including training in connection with modern slavery), and flexible working hours and salary packaging.

## *Our Supply Chain:*

Consistent with the approach detailed in this statement, during the reporting period we continued to raise awareness of modern slavery risks by distributing our Supply Partner Code of Conduct and Policy Regarding Modern Slavery Practices amongst supply partners.

We have also continued to utilize our revised supply agreement templates (updated in 2021) which require suppliers to comply with these documents in addition to modern slavery laws.

During prior reporting periods we identified that key suppliers to our network (in terms of 'spend') fell within the food, beverage and packaging sectors, provide distribution services or are green bean coffee suppliers. We sought further insight into those supply partners' response to modern slavery risks via targeted questionnaires, information provided in response to which indicated that partners had made progress in identifying, assessing and addressing modern slavery risks within their own operations and supply chains.

Contemporaneous with an FY22 restructure of our internal procurement function which has also introduced considerable experience and new expertise to our team, we identified opportunity to enhance our approach to supply partner assessment, selection and onboarding, and by extension, our approach to modern slavery risks within our supply change.

This has led to a redesign of our approach to supply partner management, implementation of the processes detailed in this statement, and the FY23 implementation of our SEDEX membership to leverage that platform to better inform and manage our procurement activities (including our response to modern slavery risk).

## *Our Franchise Partners:*

Since implementation thereof, all franchise agreements issued to our domestic Franchise Partners incorporate express provision on account of modern slavery risks and a requirement to comply with our Policy Regarding Modern Slavery Practices.

We established our wage compliance monitoring framework in FY17, and since that time have conducted over 1,100 outlet wage audits, with more than \$700,000 in lost wages being returned to team members as a consequence.



# Consultation & Conclusion

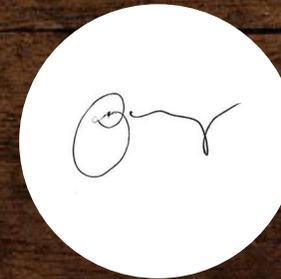
In preparing this statement, we have engaged with our:

- Procurement and coffee supply chain managers
- Our broader coffee business personnel
- Our human resource and internal legal departments
- Our Sustainability Manager
- Various other senior managers within the Group

We reiterate our support for every individual's right to live and work freely, are opposed to all forms of modern slavery, and remain committed to reducing the risk of modern slavery occurring within our operations and supply chain.

We are motivated to further enhance our governance and response in connection with modern slavery risks and to improving the processes, procedures and controls we maintain in relation thereto.

This statement has been approved by the Board of Directors of Retail Food Group Limited



**Peter George**  
Executive Chairman  
Retail Food Group Limited  
December 2023

## **Important Note Regarding Forward Looking Statements:**

*This statement contains forward-looking statements, including statements of current intention, of opinion, and predictions as to possible future events and prospects. Forward-looking statements include those containing words such as 'anticipate', 'believe', 'expect', 'project', 'forecast', 'estimate', 'likely', 'intend', 'should', 'could', 'may', 'target', 'plan', 'consider', 'foresee', 'aim', 'will' and other similar expressions. Such statements are not statements of fact, and there can be no certainty of outcome in relation to the matters to which the statements relate. Forward-looking statements involve known and unknown risks, uncertainties, assumptions and other important factors that could cause actual outcomes to be materially different from the events or results expressed or implied by such statements, and outcomes are not all within the control of RFG. Statements about past performance or activities are not necessarily indicative of future performance. Neither RFG nor any of its subsidiaries, affiliates and associated companies, or any of its or their respective officers, employees or agents (Relevant Persons), makes any representation, assurance or guarantee as to the accuracy or likelihood of fulfillment of any forward-looking statement or any outcomes expressed or implied in any forward-looking statement. The forward-looking statements in this statement reflect views held only as at the date hereof, and except as required by law, the Relevant Persons disclaim any obligation or undertaking to publicly update any forward-looking statements, or discussion of future or other prospects, whether because of new information or future events.*



# Appendix

The following details identify the mandatory reporting criteria outlined in section 16 of the *Modern Slavery Act 2018* and provides page references to where corresponding disclosures have been made in this statement

## Mandatory Reporting Criteria

- |   |               |
|---|---------------|
| (a) Identify the reporting entity   | Page 1        |
| (b) Describe the structure, operations & supply chains of the reporting entity  | Pages 2 - 4   |
| (c) Describe the risks of modern slavery practices in the operations & supply chains of the reporting entity and any entities that the reporting entity owns or controls                              | Pages 5 - 7   |
| (d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence & remediation procedures | Pages 8 - 13  |
| (e) Describe how the reporting entity assesses the effectiveness of such actions  | Pages 14 - 15 |
| (f) Describe the process of consultation with any entities that the reporting entity owns or controls   | Page 16       |
| (g) Include any other information that the reporting entity considers relevant  | Page 16       |

