

Modern Slavery Statement

For Financial Year Ended 30 June 2020





INTRODUCTION

This is the first Modern Slavery Statement for Huon Aquaculture Group Limited (Huon).

The purpose of this statement is to outline Huon's approach to ensure that the business has robust frameworks and processes in place to minimise the risk of Modern Slavery in our operations and supply chain.

At Huon, we recognise that Slavery and Human Trafficking can occur in many forms, as considered in the *Australian Modern Slavery Act 2018* (Modern Slavery Act). This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

Huon is fully committed to operating responsibly and establishing and adhering to the highest ethical standards.

Huon takes its corporate social responsibility and human rights obligations very seriously and has incorporated this risk into its broader risk management due diligence requirements.

CRITERIA 1 & 2: IDENTIFY THE REPORTING ENTITY AND DESCRIBE ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

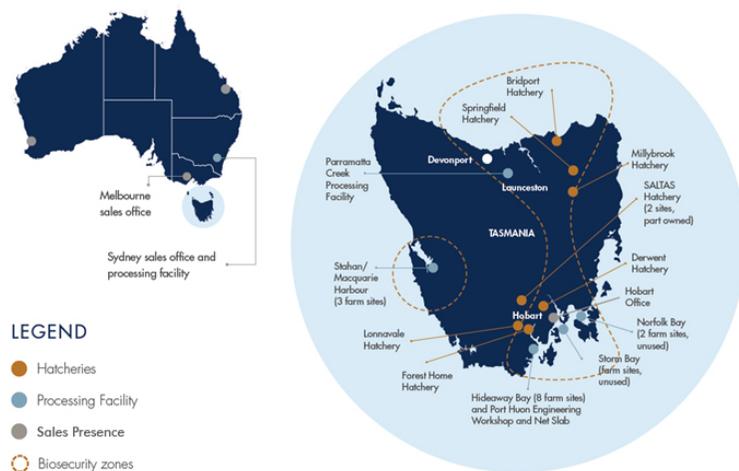
Reporting Entity & Structure

This statement is made by Huon Aquaculture Group Limited and its controlled entities. The following entities are considered reporting entities under the Modern Slavery Act: Huon Aquaculture Company Pty Ltd and Springfield Hatcheries Pty Ltd. A full list of the entities controlled by Huon are published in the 2020 Annual Report.

Huon was founded in 1986 in Southern Tasmania by a local Huon Valley farming family, the Benders. Huon now has operations across Australia, employs over 723* people and is fully vertically-integrated operation incorporating hatching, farming, processing, sales and marketing of Atlantic salmon and ocean trout.

Huon is governed by a Board of five members, three independent directors and two Executive Directors, Peter and Frances Bender. Peter is Huon's CEO and Managing Director.

Huon is listed on the Australian Securities Exchange (ASX) under the code 'HUO'. The majority of Huon's shares are held in Australia. As a listed company, Huon complies with relevant ASX disclosure policies and reporting obligations.



*As at June 30 2020



Operations & Supply chains

Huon's supply chains are both national and international and include those supply chains specific to its farming and processing activities and those of its general business activities.

The vast majority of Huon's supplies of raw materials and operational equipment is procured from within Australia. Supplies and equipment are also sourced internationally, and in our extended supply chains it may be that a modern slavery risk is present. These extended supply chains will be the principal focus area for ongoing analysis in each future reporting period.

CRITERIA 3: DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY AND ANY ENTITIES IT OWNS AND CONTROLS

The business recognises that a Modern Slavery and Human Trafficking risk may be present in our extended supply chain. We know that the level of risk is influenced by factors such as vulnerable populations, product and service category, industry and geographic location.

Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas that present an elevated risk of exposure. All of our sites and operations have comprehensive risk assessments in which the risks of modern slavery are considered.

Steps that we have taken to assess and mitigate risk in our supply chain include: working with Suppliers to strengthen their internal policies and procedures; including, but not limited to, workers' labour and payroll conditions; reworking our Supplier contracts to ensure a Modern Slavery Clause is present.



CRITERIA 4: 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

Huon has a Modern Slavery Policy and an Ethical Sourcing Policy which set out our commitment to limiting the risk of modern slavery occurring within Huon, infiltrating its supply chains, or through any other business relationship.

Huon have a robust Approved Suppliers System and additional Contractor Controls in both of which social responsibility in general and labour relations in particular, including modern slavery, can be considered.

Huon is certified to the Global Gap International Farm Assurance Standard and complies with all the standard's requirements for worker health, safety and welfare. As part of this certification, Huon are assessed against the Global Gap Risk Assessment on Social Practice (GRASP) which specifically considers labour relations and compliance to ILO core labour conditions 29 and 105 on forced labour.

Huon has always achieved a 100% score on this Risk Assessment on Social Practice. In addition, our key suppliers of fish and fish feed are also certified to the Global Gap International Farm Assurance Standard and have completed the GRASP assessment, also achieving 100% scores. Huon's feed supply companies have, and continue to do, a significant amount of work to secure supply chains to eliminate any connection with unethical or illegal conduct.

Huon have established reporting procedures and mechanisms where employees and third parties can report any concerns regarding unethical or illegal conduct; including instances relating to Modern Slavery and Human Trafficking.

Employees can report to their manager, or if they wish to remain anonymous, employees and third parties are able to report through our Whistleblower system and processes, via phone, email or an online portal. Where issues are investigated and substantiated, appropriate action is undertaken.

The Australian Federal Government legislation designed to protect vulnerable workers under the Fair Work Act, the Modern Slavery Act and Whistleblower Protection Act, has been communicated throughout the business. This is further supported by a suite of Policies and associated procedures including:

- Modern Slavery Policy;
- Code of Conduct;
- Whistleblowers policy; and
- Diversity Policy;



CRITERIA 5: DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF THESE ACTIONS

All policies and risk assessments are reviewed annually and updated as required and annual audits of the business to the Global Gap International Farm Assurance Standard and GRASP module ensure the risks of modern slavery in the business and the effectiveness of actions to reduce risk are continually addressed. Through these actions the level of understanding of the nature of and risks pertaining to Modern Slavery has been elevated through the business and have culminated in this Statement.

CRITERIA 6: DESCRIBE THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

The Huon Board has adopted the Modern Slavery Policy and mandated that stakeholders throughout the business understand and maintain awareness of the Policy through the annual training regime implemented by the business' Human Resource and Procurement Teams.

CRITERIA 7: ANY OTHER RELEVANT INFORMATION

N/A

This statement has been approved by the Directors of all reporting entities and by the Board of Huon Aquaculture Group Limited.

A handwritten signature in black ink, appearing to read "Peter Bender", with a long horizontal flourish extending to the right.

Peter Bender

CEO/Managing Director