

# SAFCOL AUSTRALIA PTY LTD



## Modern Slavery Statement 2024

FAIR WORK  
COMPENSATION



RIGHT TO  
AFFILIATION



UNIVERSAL  
HUMAN RIGHTS



FAIR WORK  
CONDITIONS



RIGHT TO  
REPRESENTATION



SAFE WORK  
CONDITIONS





## FOREWORD

Safcol Australia Pty Ltd (Safcol) is committed to ethical and socially responsible business practices. We are a diverse community and we treat each other as equals, regardless of background. Safcol is respectful of the communities in which we work and with whom we work, we remain sensitive to cultural needs and requirements. We expect our suppliers and customers to join us in the commitments to human dignity and respect irrespective of background or culture.

Safcol is serious about detecting, preventing and fighting against modern slavery in our operations and supply chains.

## BUSINESS OVERVIEW

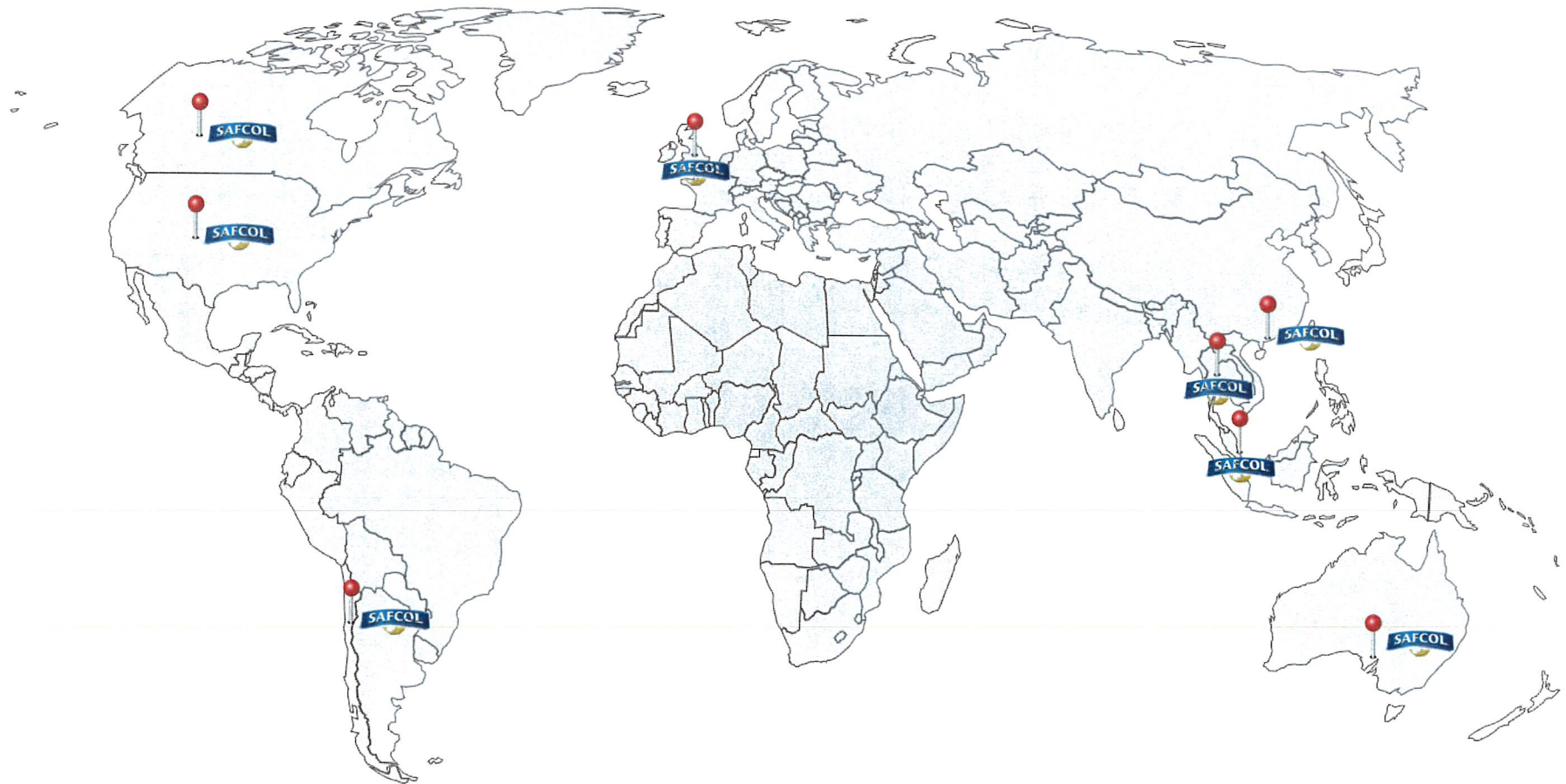
Safcol Australia Pty Ltd was founded in 1945 by a group of South Australian Fishermen to sell their catch; the first of its kind in Australia. This connection with the craft and the catch has been constant throughout our history. Today, Safcol continues to manage the thriving South Australian Fish Market and is a diversified consumer products group, marketing its products across the Australian Retail Market in supermarkets and other specialty stores. Safcol carries the mantle of The Seafood Experts proudly and is the only seafood company in Australia controlling its catch from ship to shelf. Safcol is one of the world's major suppliers of fresh, packaged and frozen seafood. We are respected for our philosophy of sustainability and our guarantee of quality.

We have over 75 years experience, from traditional beginnings to the operation of fleets and plants around the world. We can supply virtually every type of seafood, fresh or frozen. Safcol services a wider market than most other suppliers of quality seafood: Australia, New Zealand, Singapore, Hong Kong, China, Thailand, Malaysia, Greece, the Middle East, Slovenia, Chile, Canada and the USA. Safcol has built a loyal following of discerning customers. We continually develop new products and meet government standards in all markets. Our catch is delivered direct to our canning and processing plants. We do not operate "mother ships" that operate as floating freezers.

Our wild tuna catch is certified "Dolphin Safe" by the Earth Island Institute. We respect marine conservation. We comply with the highest EU and USA standards and have the knowledge to comply with all other standards of the countries we deal with. *Safcol strives to operate free from exploitation, discrimination, bullying and harassment or marginalisation of anyone.*



## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN





## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN





## Safcol Third-Party Suppliers' Geographic Locations (Indicated by Safcol Logos)

### Third-Party Product Supply Partners

China – Instant noodles, Soy Sauce, Fish Sauce, Sesame Oil

Spain – Olive Oil

Poland – Brisling Sardines

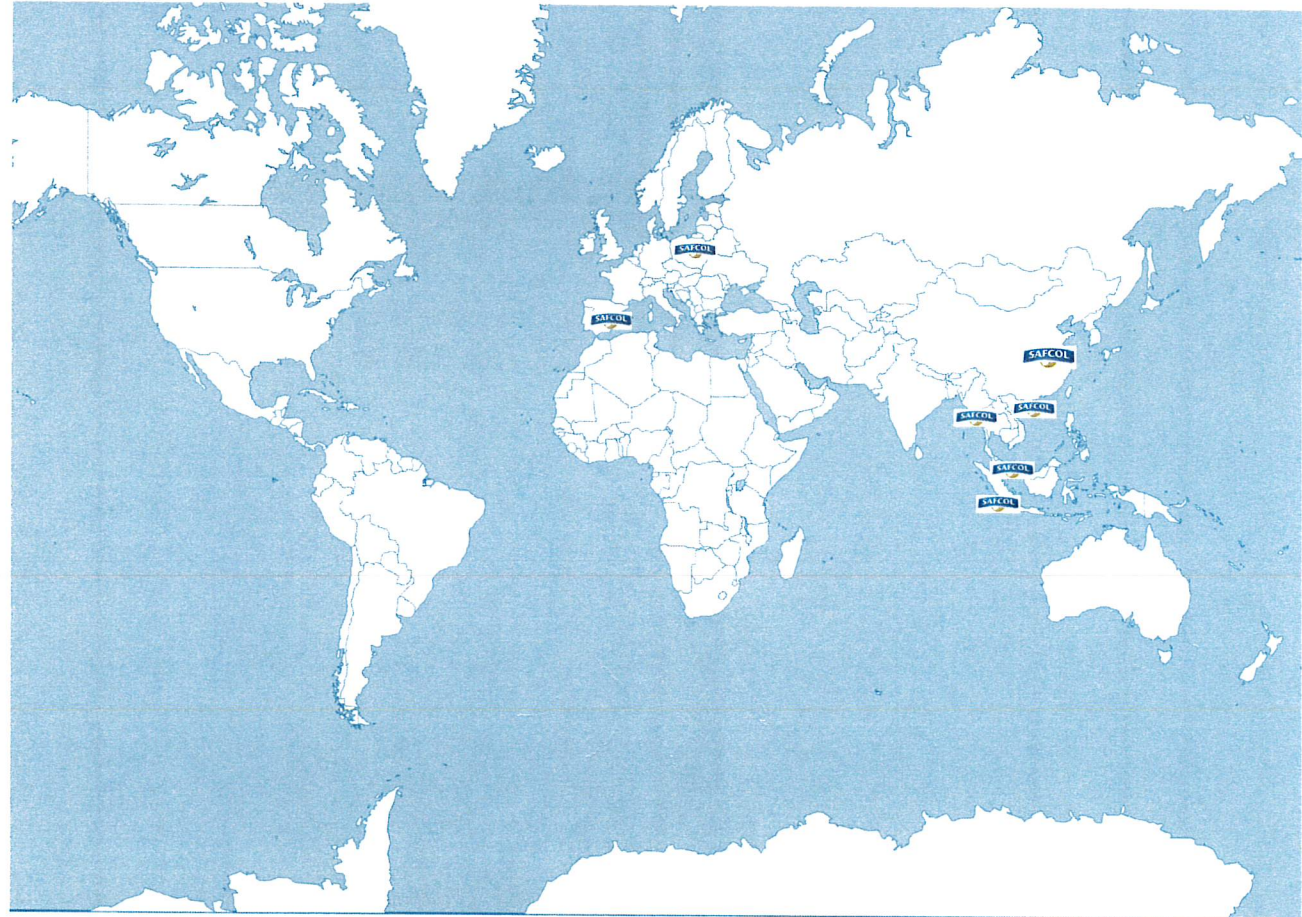
Indonesia – Tuna & Sardines

Singapore – Cooking Oils

Vietnam – Tuna

Thailand – Sardines

Listed suppliers supply slave labour and human rights audits to Safcol as part of Safcol Business protocols.





## OUR PRODUCTS & SERVICES

Safcol is one of the world's major suppliers of fresh, packaged and frozen seafood. We are respected for our philosophy and sustainability and our guarantee of quality.

Our customer base includes food wholesalers, distributors and retailers; major supermarket chains, commercial caterers and the food service industry.

### Our Products

~ Tuna ~ Salmon ~ Sardines ~ Squid ~ Mussels ~ Oysters ~ Pet Food

### SAFCOL South Australian Fish Market

Founded in 1945, our South Australian fish market continues to thrive.



## OUR SUPPLY CHAINS



Safcol's supply chain is a vast network of service providers and suppliers to support its operations. From product ingredients, packaging and labelling to consumables, personal protective equipment (PPE), contract services and maintenance contractors. We also purchase fresh and frozen seafood as required from third parties.

We support Australian suppliers where possible and partner with quality suppliers that share our commitment for ethical and socially responsible business practices.



## RISK OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Whilst we acknowledge that some of the groups within our supply chain may be associated with higher risks of exploitation and slavery due to their geographical location, as part of our contracting processes, we carry out our due diligence to ensure severe modern slavery practises such as forced and bonded labour are not taking place.

Safcol employs the services of global auditing companies to gain visibility into areas of risk within our business and supply chain. Thereby allowing us to prioritise higher levels of risk and take action before they become a problem.

To date, these audits have not detected any modern slavery practises, therefore we report our risk as LOW.



Safcol is dedicated to its commitment to continually assess its operational risk and should any concerns be detected the issue will be escalated to the CEO and Board for consideration and action at the enterprise risk level.

### Low risk is achieved and maintained by:

#### Third Party Audits

Safcol and our holding company supply world renowned grocery retailers like Walmart, Aldi, Woolworths Australia and Coles Australia. We partner with these retailers in audits of our operations conducted by Intertek and Sedex, amongst others. Annual audits take place in all of our factories and operations, both locally and internationally.

#### Adherence to labour & safety laws of the country

Safcol adheres to all labour laws of the country in which they operate in line with UN Universal Declaration of Human Rights.

#### Governance & Control

Safcol is an active participant in third party audits and our management team, led by our CEO is vigilant about protecting the rights of workers, and this sets the culture for the entire organisation. Safcol has a range of policies and procedures which sets the expectation and standard that our factories and supply chain must adhere to.

#### Workforce Management

Safcol in Australia hires workers directly, so we have a 'hands on' approach to dealing directly with our employees.

#### Detection & Mitigation process

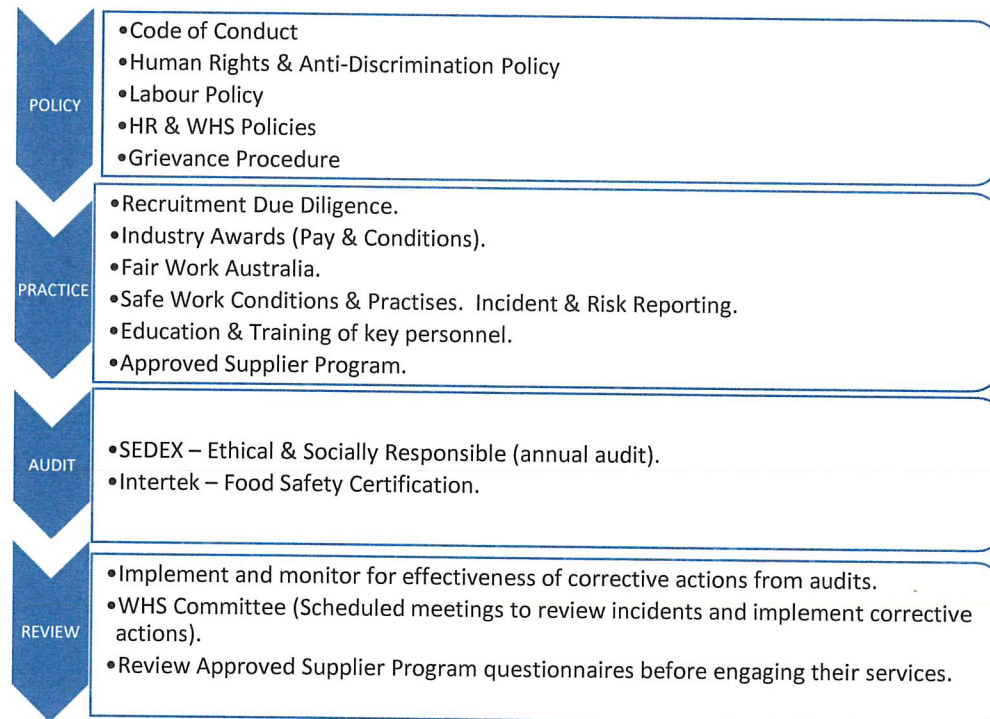
This is a continual 6 step process, return to step one and repeat.





## ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY

Safcol has developed a human rights strategy to assist with identifying, preventing, mitigating and remedying any risks. Our strategy comprises of a comprehensive library of policies and procedures underpinned by our Code of Conduct and is a collaborative, risk-based and quality management approach with a focus on continual improvement.







## HUMAN RIGHTS POLICY

Safcol Australia recognizes that all human beings are valued and equal in dignity and rights.

Safcol Australia, respects human rights as the fundamental virtue for working and living together.

This policy outline underpins our way of doing business, and the respect for employees is based on the principle of reciprocal respect for an employee's honour and dignity.

Safcol Australia upholds and respects human rights as reflected in The United Nations Universal Declaration of Human Right (UNDHR) <https://www.un.org/en/universal-declaration-human-rights/> and The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. <http://www.ilo.org/declaration/lang--en/index.htm>

Safcol Australia commits to:

- Freedom of association and the effective recognition of the right to collective bargaining,
- The elimination of forced or compulsory labour
- The abolition of child labour and the elimination of discrimination in respect of employment and occupation.
- The Company's commitment to respecting human rights is derived from continuous efforts in running the business ethically and responsibly.
- This policy is applied to Safcol Australia and we strongly encourage primary suppliers, to adhere to the aforementioned principles and declarations in our supply chain.

To promote respect for human rights throughout the organization as well as to build confidence that all employees and stakeholders are entitled to fair treatment, protection and respect for fundamental rights equally and fairly, the company commits to the following practices:

Strictly comply with the Company's rules and regulations, including local and international laws.

- Regularly monitor and assess risks and impacts on human rights as well as provide appropriate risk management guidelines or control measures.
- All business units to ensure that risk management is fully implemented in their area(s) of responsibility.
- Foster proactive two-way communication amongst employees to promote greater awareness, knowledge, and understanding of their role in respecting human rights.
- Grievance mechanisms for employees and stakeholders to raise concerns, make complaints or identify adverse human rights impacts in the case of human rights violations.
- Adhere to procedures for investigating allegations of human rights abuses and violations upon receiving grievance reports from employees and/or stakeholders, as well as report to top management to pursue effective solutions to mitigate adverse human rights impacts.
- Communicate and disseminate policy and guiding principles to business partners to serve as guidelines for preventing involvement in human rights violations.
- Insist on ethical business conduct amongst business partners to build a culture of reciprocal respect, in a sustainable manner.
- In this regard, the Company's commitment to respect human rights has been explicitly reflected through the key corporate policies as follows:



## HUMAN RIGHTS POLICY

Human rights outline of procedure:

- We commit to a human rights policy and implement policies and procedures to achieve them.
- Prevention – a commitment to prevent the risks of human rights violations within our business and within the businesses that supply and partner with Safcol Australia.
- Detecting human rights violations – Safcol Australia commits to detection of human rights abuses within our supply chain.
- Monitoring of our own operations and those in our supply chain to ensure that any human rights risks are highlighted.
- Addressing Risks and implementing procedures of dealing with human rights risks, and any human rights abuses both within our company and within our supply chain.

Safcol Australia is open to collaboration with key stakeholders and NGO's and Safcol Australia is willing to implement best practices within the industry, complying at all times with local labour laws.

Safcol Australia allows free association for all employees to trade unions and NGO's that are legal and operate within the laws of Australia.

Safcol Australia respects all individuals and will work hard to:

- Prevent all forms of discrimination in terms of hiring, training or compensation that may arise through an individual's religious beliefs, race, ethnicity and or gender.
- Ensure the workplace is free from intimidation or victimization.
- Strictly prohibit any forms of abuse - physical or mental, verbal or emotional.
- Provide a secure employee and employer relationship particularly where contracts and sub contract hire relationships exist.

Safcol Australia encourages open dialogue with aggrieved workers, and we have a corporate culture that fosters a climate of openness for discussion and collaboration with all workers. Any violations to human rights can be reported through our customer care line 1800 819 785 or mail@safcol.com.au any and all grievances can be reported and confidentiality will be respected at all times.

To properly implement the organization's human rights programme, Safcol Australia has announced the appointment of a Human Rights Policy Committee as follows:

- Chief Executive Officer
- Chief Financial Officer
- General Manager of Operations
- People & Culture Manager



## CONSULTATION PROCESS

Safcol Australia has a range of measures in place to support consultation about modern slavery risks across our business.

We have appointed a Human Rights Committee where concerns in respect of Safcol's obligations under the Modern Slavery Act 2018 and Safcol's practices in its operations and supply chains can be raised and addressed.

Our Committee members consist of management representatives who will assist in providing oversight on our internal processes for modern slavery risk assessment.

Major stakeholders have been consulted in conjunction with the writing of our Modern Slavery Statement to ensure the risk assessment process is an accurate representation of current practices.

Our Approved Supplier Program has been revised to increase its scrutiny around modern slavery.

Safcol is registered with the Modern Slavery Business Engagement Unit to receive updates to any changes in legislation to ensure compliance.

## APPROVAL

This statement has been considered and approved by the Safcol Australia Board of Directors in their capacity as principal governing body of Safcol Australia Pty Ltd on 29<sup>th</sup> September 2024.

A handwritten signature in black ink, appearing to read "A Mitchell".

Andrew Mitchell

Chief Executive Officer and Board Member