

A close-up photograph of a potato plant in a field. The plant has several green, lobed leaves and a small cluster of tiny white flowers. The background is a blurred field of similar plants under bright, natural light, creating a bokeh effect.

**2020/21**  
**Modern Slavery**  
**Statement**



## A Message from Simplot Australia's Managing Director

I am pleased to share Simplot Australia's second Modern Slavery Statement, which outlines the actions that we have taken in the 2020/2021 reporting period to mitigate the risks of Modern Slavery in our supply chain and operations.

Our Statement also details the future activities we are committed to implementing to ensure we uphold human rights and contribute to a better future.

We are a leading agricultural and food manufacturing business, employing almost 2,000 people across Australia and New Zealand. We work closely with Australian growers and a network of local and global suppliers. Simplot Australia operates a complex and extensive supply chain globally and throughout Australia and New Zealand. As such, we understand that identifying issues of modern slavery can be challenging within such a large operation.

As an organisation, we are grounded in an unwavering commitment to transparency, quality, and mutual respect and are steadfast in our ethical approach to business. We are committed to taking actions against and remediating any instances of modern slavery if discovered in our supply chain and operations. Modern slavery practices, including human trafficking, forced labour, debt bondage, forced marriage, and other abuses of fundamental human rights, are unacceptable.

Since the release of our first Modern Slavery Statement in 2021, we have not discovered any instances

of modern slavery and we have continued to make progress in identifying and managing the risks of modern slavery and embedding our Modern Slavery Program into our standard ways of operating. This has seen us invest in additional team resources, systems and processes and strengthen the governance framework of our Modern Slavery Program.

Our Program governs how we identify, classify and manage our modern slavery risks for our suppliers and our own manufacturing sites. We have achieved further progress by conducting SMETA 4 Pillar Social Compliance audits at two of our Australian manufacturing sites and developed and implemented a risk assessment process for our agricultural suppliers. Preventing modern slavery in our supply chain is embedded in our business and is one of the key pillars of our total sustainability strategy.

At Simplot Australia, we believe we can make a significant difference in addressing the global issue of modern slavery through the collective efforts of our team members, suppliers, customers and industry bodies. We have endeavoured to advance our knowledge and our ability to affect positive impact through our partnerships and by participating in industry collaboration. Working together is essential to help improve the lives of all in our global community.

This Statement was approved by the board of Simplot Australia on 28th March 2022.

**Graham Dugdale**  
Managing Director Simplot Australia  
28th March 2022

### KEY HIGHLIGHTS FOR CURRENT REPORTING PERIOD

Active industry collaboration to share learnings and gain knowledge on best practices for addressing modern slavery.

Conducted SMETA 4 Pillar Social Compliance audits at select Simplot Australia manufacturing sites.

Developed and implemented risk assessment process for agricultural suppliers in our supply chain.

Evolved our Modern Slavery Program by onboarding remaining suppliers.

Commenced pilot for Social Compliance audits with key international suppliers.



“Working together is essential to help improve the lives of all in our global community.”

Simplot Australia Pty Ltd, ACN 070 579 609 (“**Simplot Australia**”) is the applicable reporting entity pursuant to the Modern Slavery Act 2018 (Cth). Simplot Australia is a wholly-owned subsidiary of The J.R. Simplot Company, a company registered and headquartered in Boise, Idaho, USA. Simplot Australia has its head office and registered address in Melbourne at 2 Chifley Drive Mentone, Victoria 3194.

In this Modern Slavery Statement, the terms the “Company”, “our business”, “organisation”, “we”, “us”, and “our” refer to Simplot Australia, except where the context otherwise requires.

Simplot Australia's Modern Slavery Statement is intended to meet the current and future disclosure requirements of the Modern Slavery Act 2018 (Cth).

This Modern Slavery Statement is made according to the Modern Slavery Act 2018 (Cth) and constitutes the Modern Slavery Statement for Simplot Australia for the foreseeable future, and covers the period 1 September 2020 to 31 August 2021 (“**Reporting Period**”). Each Simplot entity is covered by The J.R. Simplot Company policies, and there are also specific policies that relate to Simplot Australia's operations, procedures, and systems including those relating to supply chain management, contracting, purchasing and human resources

Simplot Australia acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures and to Elders, both past, present and emerging.

### CONTENTS

- 3 A message from Simplot Australia's Managing Director
- 4 COVID-19 and its Impacts
- 5 Our Company Structure, Operations and Supply Chain
- 7 Identifying Modern Slavery Risks
- 10 Partnerships and Industry Collaboration
- 12 Actions to Mitigate and Address Modern Slavery Risks
- 17 Assessing the Effectiveness of our Actions
- 18 Areas of Future Focus

# COVID-19 and its Impacts

The pandemic has continued to present several human rights challenges, particularly those related to socio-economic and livelihood impacts. Like many companies, Simplot Australia has been cognisant of these impacts on our people, our suppliers, customers, and the profound effect on the broader community. Throughout the pandemic, the decisions and actions we have taken, and continue to take, have been based on the priorities of keeping our people safe and healthy and ensuring operational continuity so that we can provide the essential food products that our communities rely upon.

COVID-19 has continued to impact the timeframes for conducting Social Compliance audits at our own facilities and with our suppliers. This is due to state lockdowns, travel restrictions and limited auditor movement. This has been an issue affecting the industry as a whole and is not unique to Simplot Australia. Despite these ongoing challenges, we were able to conduct a combination of on-site and virtual assessments to complete the required audits at our sites. We were also able to progress our auditing program with key international suppliers despite the disruption caused by COVID-19.

The pandemic has also caused significant challenges in our extended supply chain, one of which includes the disruption to the Observer Program operated by our partner Pacifical, where they report on the living and working conditions of fishers and report on any potential human rights breaches. Due to the density limit restrictions, concerns for crew safety and potential to spread the virus onboard fishing vessels, the Pacifical

Simplot Australia is committed to upholding human rights throughout our operations and supply chain, and we continue to make every effort in the face of COVID-19 to safeguard our team's health, safety and wellbeing.

Observer Program was scaled back. This resulted in some fishing expeditions being without Observers which reduced visibility into the vessel operations. However, no concerns have been raised by Pacifical regarding breaches to human rights and they are working towards scaling up the Observer Program back to pre-pandemic levels.

Simplot Australia is committed to upholding human rights throughout our operations and supply chain, and we continue to make every effort in the face of COVID-19 to safeguard our team's health, safety and wellbeing.



# Our Structure, Operations and Supply Chain

## OUR COMPANY STRUCTURE

Simplot Australia is an agricultural and food manufacturing business that provides quality, sustainable and nourishing food to retail and foodservice customers in Australia, New Zealand and chosen Asia Pacific growth markets.

We are home to some of Australia's most loved and trusted retail food brands – Birds Eye, Edgell, John West, Leggo's, Raguletto, Five Brothers, I&J, Chicken Tonight, Five Tastes, Harvest, Seakist, Ally and Chiko. We are also one of Australia's largest suppliers of foodservice products, and we supply quick service restaurants, cafes, restaurants, stadiums, hospitals, aged care facilities and many other venues. These range from balanced meals, convenient frozen vegetables, tasty pasta sauces, and nutritious seafood to snack foods.

As a business, we pride ourselves on building long-term partnerships with Australian farmers and all that work in our supply chain, investing in our people, and building mutually beneficial relationships with our customers.

Simplot Australia's head office is located in Mentone, Victoria, and it is part of the privately-owned J.R. Simplot Company based in Boise, Idaho in the United States.

## OUR OPERATIONS

Simplot Australia directly employs almost 2,000 people in Australia and New Zealand and many of these work at one of our six manufacturing facilities. Our facilities are located in Flemington and Echuca in Victoria, Bathurst and Kelso in NSW and Devonport and Ulverstone in Tasmania. Additionally, we have two Agricultural Services facilities located to support our NSW and Tasmanian vegetable processing operations. We are also proud to work with over 300 Australian growers who supply 400,000 tonnes of Australian vegetables to our operations each year.

The broader Australian manufacturing and agricultural industry is also supported through our operations, including transportation, distribution, cold store providers, ingredient and packaging suppliers. We work closely with 2,329 suppliers, of which 2,143 (92%) are based in Australia.

## OUR SUPPLY CHAIN

Simplot Australia's supply chain is a complex mix of local and overseas suppliers covering numerous product and service categories. In the reporting period, our supplier base consisted of 2,329 suppliers, of which 822 are in scope of our Modern Slavery Program. Suppliers that are considered in scope of our Program are those evaluated based on meeting the Program's requirements, which includes a minimum spend and volume threshold, level of risk, visibility of supply chain, and consistency of supply. By applying this criteria, we can focus our efforts to mitigate the risks of modern slavery in the areas where we can have the most impact. The following diagram identifies the categories and number of suppliers in scope of the Program at Simplot Australia.

We work closely with 2,329 suppliers, of which 2,143 (92%) are based in Australia.

● Number of Suppliers in scope of Modern Slavery Program

● Percentage of Suppliers in scope of Modern Slavery Program

### DIRECT SUPPLIERS

Direct suppliers provide us with goods such as ingredients, packaging and raw materials that form a part of our finished product for consumers. For example, the tuna for our John West tuna range or the herbs and spices in our Five Tastes range.



212

100%

### INDIRECT SUPPLIERS

Indirect suppliers provide us with goods and services that do not directly form part of our finished goods for consumers. For example, the stationery we use at our offices, or the internet data plans used across our sites.



254

19%

### LOGISTICS SUPPLIERS

Logistics suppliers provide us with transport modes to move our product around Australia and internationally. This includes trucks, rail and sea freight. For example, sea freight used to transport our products from Tasmania to the Australian mainland.



56

62%

### AGRICULTURAL SUPPLIERS

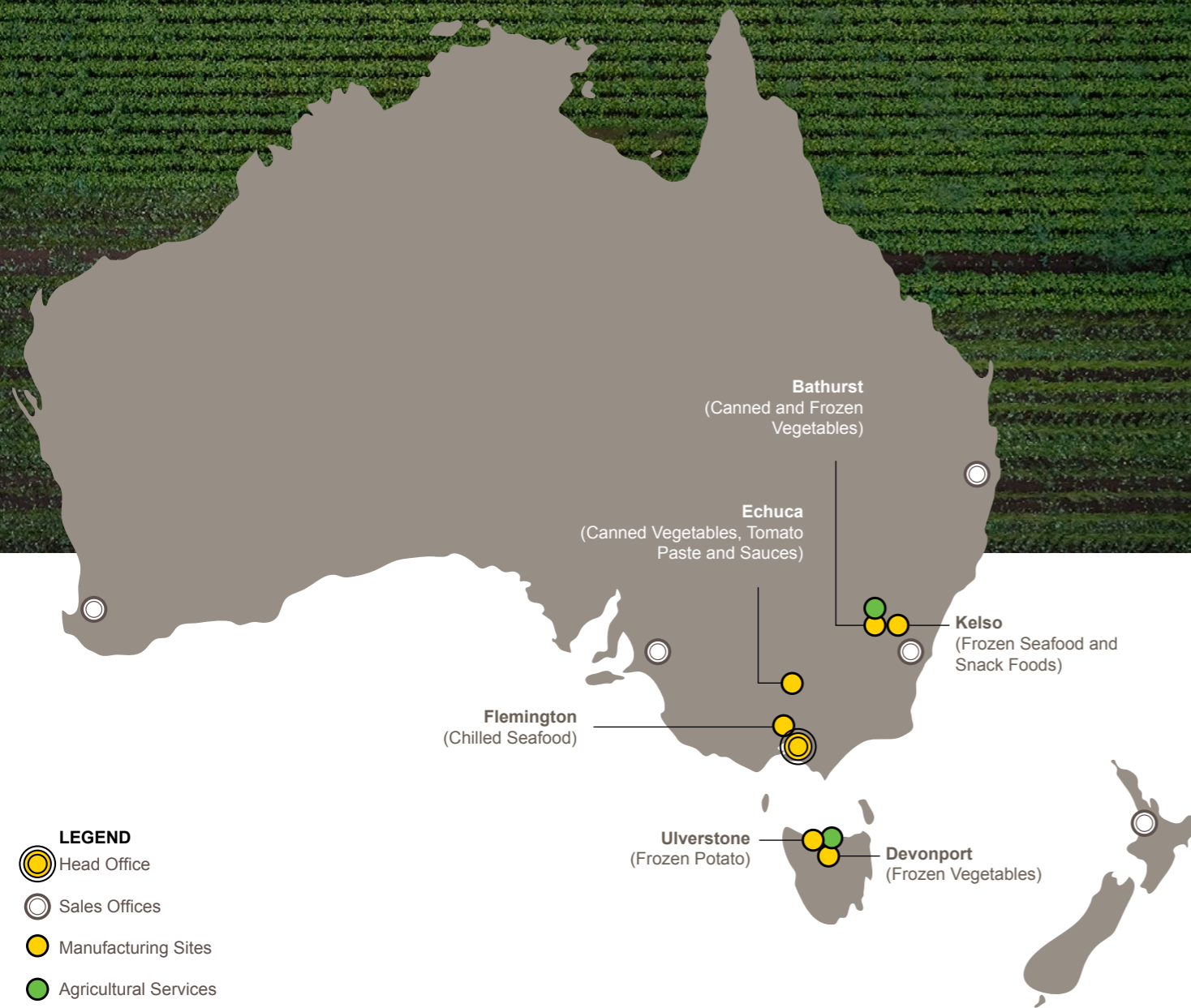
Agricultural suppliers refers to suppliers that provide the agricultural inputs to our manufacturing facilities that become finished goods. For example, the potatoes grown that become our Birds Eye frozen chips.



300

100%

# Identifying Modern Slavery Risks



As a large agricultural and food manufacturing business, Simplot Australia's operations and supply chain are diverse and complex. We are focused on ensuring that human rights are upheld throughout our complex business. We conduct various activities that help us evaluate the areas of greater risk so we can focus our efforts on identifying and mitigating modern slavery risk.

To build upon our initial risk mapping assessment commissioned in 2015 by KPMG, we have evolved our risk assessment process to include insights from our community partnerships, consultation with external advisory groups, industry collaboration and information from Sedex to help us identify modern slavery risks.

Simplot Australia acknowledges that modern slavery can take many forms including trafficking in persons, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

The following four types of modern slavery are the most relevant to the industries in which Simplot Australia operates:

**FORCED LABOUR:** Where the victim is either not free to stop working or not free to leave their place of work.

**DEBT BONDAGE:** Where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.

**WORST FORMS OF CHILD LABOUR:** Where children are either exploited through slavery or similar practices, including for sexual exploitation, or engaged in hazardous work that may harm their health, safety or morals, or used to produce or traffic drugs.

**DECEPTIVE RECRUITING FOR LABOUR OR SERVICES:** Situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

## OUR ICONIC BRANDS



### IDENTIFYING RISKS WITHIN SIMPLOT AUSTRALIA'S OPERATIONS

Within our own operating locations, we assess the risk of modern slavery to be low due to our full operational oversight. This is supported by the majority of our team members at our six manufacturing sites and corporate offices located in Australia and New Zealand being covered by enterprise agreements and employment contracts. The mechanisms for verifying and managing this risk is further detailed on page 14.

### IDENTIFYING RISKS WITHIN SIMPLOT AUSTRALIA'S SUPPLY CHAIN

#### AGRICULTURAL SUPPLIERS

We work closely with our 300+ agricultural suppliers. Our employees collaborate with farmers, frequently visiting farms, and this provides greater visibility of any modern slavery risks that may exist. As part of our risk identification process for our agricultural suppliers, Simplot Australia has developed a modern slavery risk assessment tool to identify any indicators of modern slavery present at the grower sites.

This involved engaging an external consultancy to create a questionnaire that focuses on identifying modern slavery indicators. Questions include, but are not limited to, health and safety standards, employment arrangements and methods of pay, and working conditions. The questionnaire is completed on handheld devices by a Simplot Australia employee in the field and a risk rating is generated based on weighted responses to the questionnaire.

Simplot Australia uses this information to investigate and escalate any areas of concern. We believe the best process for identifying and mitigating modern slavery risk involves collaboration and partnership with our suppliers, partners, and growers. No instances of modern slavery have been identified to date.

#### SUPPLIERS

Simplot Australia acknowledges the potential for modern slavery to occur throughout our supply chain. During the reporting period, we undertook a risk assessment using information from the Sedex platform to identify the countries and sectors that represent a greater risk throughout our supply chain. This risk assessment has helped inform our areas of focus and development of our Modern Slavery Program to ensure we address the areas where we can have the most impact. These areas are represented in the map.



#### LEGEND

Risk assessment of Simplot Australia's suppliers in high-risk countries

- Labour Standards
- Freedom of Association
- Wages
- Forced Labour
- Excessive Working Hours
- Child Labour

# Partnerships and Industry Collaboration

## CASE STUDY: Partnership with Pacifical to help prevent modern slavery in our supply chain



Simplot Australia has partnerships with several non-government organisations. We contribute to programs that support our local and global communities, which are important to strengthening human rights in the communities in which we operate. These collaborations are important to enable us to share knowledge and communicate ideas to help prevent modern slavery in our industry.

### PARTNERSHIP



#### PACIFICAL

We have a long-established partnership with Pacifical, who are the Pacific Region leaders in promoting sustainably and socially responsibly caught skipjack and yellowfin tuna. Our partnership provides us with assurance that the vessels catching John West tuna meet our sustainability and human rights standards. To learn more about our partnership with Pacifical, please read the case study on page 11.

### INDUSTRY COLLABORATION

Proud to be a



#### SEDEX ANZ AGRICULTURAL WORKING GROUP

Simplot Australia is pleased to participate in the Agricultural Working Group as part of the Sedex ANZ Advisory Group, which brings together suppliers and major retailers to discuss their Modern Slavery Program experiences, particularly in the agricultural sector. It is an opportunity to learn and collaborate with other peer companies to understand best practices and help reduce the risks of modern slavery as an industry.



#### AUSTRALIAN FOOD AND GROCERY COUNCIL (AFGC)

Simplot Australia is represented on various groups and committees within the AFGC, allowing us to stay abreast of, collaborate on, and contribute to issues facing the food and grocery industry in Australia. This includes topics such as modern slavery.

#### INDUSTRY NETWORKING

We play an active role in collaborating with like-minded businesses in our network to discuss shared challenges and solutions in the design and implementation of our Modern Slavery Program.

Simplot Australia has a long-established partnership with Pacifical, who promote sustainable fisheries management initiatives and increase the socio-economic benefits from tuna fisheries within the waters of nine Pacific Ocean nations (PNA).

We acknowledge the potential for workers in the fishing industry to be exposed to exploitation due to the challenging environment of working at sea. Pacifical relies on trained Observers to the Pacific Island Regional Observer Program standard to be the eyes and ears at sea. Their role includes monitoring compliance, collecting data and reporting on the working and living conditions aboard vessels fishing within PNA waters. The Observers use the PNA/Pacifical Social Accountability Guidelines which outlines the human rights standards that fishing companies catching tuna for Pacifical must enforce. The Guidelines include clauses to ensure that no forced, bonded or child labour is used onboard, no harsh or inhumane treatment is used as a disciplinary measure, acceptable living and working conditions and decent employment with fair remuneration is provided

If an Observer identifies any instance that may breach the Social Accountability Guidelines, they will include their observations in the Trip Compliance Record

and electronically report it to PNA. The report is later reviewed by their supervisor on land. Where a serious incident is reported, it will be investigated and if substantiated, action is taken to remediate the issue which may include prosecution under national laws. Additionally, a Marine Stewardship Council (MSC) Certificate will not be issued on the fish caught from that trip and the vessel may face penalties including potential suspension from the PNA MSC scheme. To date, there have been no reported instances of human rights violations through our partnership with Pacifical.

Simplot Australia is committed to increasing our visibility of human rights issues and remediating any issues when they are found throughout our operations and supply chain. We are proud to partner with Pacifical to help us achieve this goal of upholding human rights and continuing to improve practices.

Additionally, Simplot Australia actively supports the communities of the PNA through this partnership. Pacifical have valued the economic benefit to the PNA communities at approximately AU\$0.15 per can of John West tuna product sold. These funds empower the nations to support and develop their communities by building schools, hospitals, roads, infrastructure and ensuring social security.

Simplot Australia is committed to increasing our visibility of human rights issues and remediating any issues when they are found throughout our operations and supply chain.

# Actions to Mitigate and Address Modern Slavery Risks

At Simplot Australia, we have established strong governance frameworks that manage our modern slavery risks across our operations and supply chain. This includes our policies, contracts, monitoring activities and engagement with our team members and suppliers.

## GOVERNANCE STRUCTURE

We are committed to upholding human rights and taking the necessary steps and actions to ensure that we identify, manage, and mitigate risks of modern slavery. To this end, the accountability and ultimate responsibility for managing human rights risks, including modern slavery, reside with Simplot Australia's Managing Director and Executive Leadership Team, who are supported by our Sustainability Steering Committee, Sustainability Working Group and the operational teams who action the Modern Slavery Program on a day-to-day basis.

Any concerns are discussed at the Program governance level where the need for escalation is determined. The avenue for escalating concerns related to modern slavery is at our regular Executive Leadership Team Risk and Governance forum. Similarly, if any concerns are raised through our Whistleblower grievance channel the Executive Leadership Team will be informed.

## SIMPLOT AUSTRALIA'S GOVERNANCE STRUCTURE



## GOVERNANCE FRAMEWORK

We have a comprehensive set of policies, standards and practices that outline our values and ways of working. Our policies outline the standards and principles that we expect our customers, contractors, suppliers and their sub-tier suppliers to adhere to when conducting their business with us.

As applicable to our suppliers, the standards and principles from The J.R Simplot Company Code of Conduct have been incorporated into [Simplot Australia's Partner Code of Conduct](#). [The Simplot Australia Partner](#)

[Code of Conduct](#) is also based on international standards and best practice guidance from the United Nations Guiding Principles on Business and Human Rights, International Labour Organisation and the Ethical Trade Initiative (ETI) Base Code.

The J.R Simplot Company and Simplot Australia will not knowingly conduct business with suppliers who violate laws relating to employment, the environment or safety, or engage in any other unethical employment practice.



## POLICIES AND PROCEDURES IN OUR OPERATIONS



**SIMPLOT AUSTRALIA'S WHISTLEBLOWER POLICY:** Provides a framework and encourages the reporting of instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Simplot Australia. We respect the rights of individuals who defend human rights, and do not tolerate threats, intimidation or attacks against any individuals who raise concerns.

Whistleblowers can raise issues confidentially and anonymously through internal channels, which may include calling The J.R Simplot Company Employee Reporting Hotline or in writing to a Whistleblower Protection Officer.

For external suppliers or partners wishing to raise a concern, they can make a report by emailing [PartnerReporting@simplot.com.au](mailto:PartnerReporting@simplot.com.au) or verbally to Simplot Australia's General Counsel. All concerns raised will be investigated and acted upon by the Whistleblower Protections Officer, which is then reported to the Executive Leadership Team where required.

To date, there have been no concerns raised through our Whistleblower mechanisms regarding modern slavery violations.



**THE J.R SIMPLOT COMPANY GLOBAL CODE OF CONDUCT:** Defines the global behavioural expectations we have of our team members with respect to colleagues, suppliers, customers and members of the community.



**SIMPLOT AUSTRALIA'S PROCUREMENT POLICY:** Outlines the process for procuring goods and services and requires activities to be conducted in an honest, competitive, fair and transparent manner.



**THE J.R SIMPLOT COMPANY EMPLOYEE REPORTING HOTLINE:** An independent service that provides employees with a confidential place to voice concerns or raise issues.



### MONITORING OUR OPERATIONS

We use a combination of mechanisms to monitor modern slavery risks across Simplot Australia's operations. These methods include verification through internally initiated reviews in accordance with our Program, bespoke or cyclical customer audit requests and industry recognised audits. Through these various tools, we have assessed our operational risk of modern slavery as low.

Throughout the reporting period, we conducted two SMETA 4 Pillar Social Compliance audits at our manufacturing sites – Ulverstone and Flemington. This was the first time these sites have undergone an audit to this social compliance standard. Previous to this in 2019, a SMETA 2 Pillar audit was conducted at our Echuca site. These audits were a significant milestone for Simplot Australia as they independently confirmed our assessment of our operational risks as low. The audits identified no areas of concern regarding the risks of human rights breaches at our sites. The audits highlighted some ongoing opportunities for improvement relating to broader topics such as providing employees with greater clarity on voluntary overtime, refining our fatigue management program and improving training on The J.R Simplot Company Code of Conduct.

We have implemented changes to improve these areas and applied these learnings across our other sites. The audits were an important exercise for us to learn from the auditor's experience and to understand industry best practices, this not only assists us in understanding our own operations through a social compliance lens but helps us to implement an effective verification program for our suppliers. We will continue to work with our customers and within our own framework to conduct monitoring of modern slavery risks within our own operations.

### POLICIES AND PROCEDURES FOR OUR SUPPLY CHAIN

**SIMPLOT AUSTRALIA'S PARTNER CODE OF CONDUCT:** We expect suppliers to adhere to all applicable laws and regulations and to use their best endeavours to comply with the principles of Simplot Australia's Partner Code of Conduct. It includes clauses prohibiting the practice of forced labour, bonded labour, human trafficking, and child labour, as well as ensuring that workers work reasonable hours, receive fair wages, and are provided safe and healthy working conditions and the right to freedom of association and collective bargaining. Currently, there are 839 suppliers who have signed the Simplot Australia Partner Code of Conduct. That is an increase of 129 suppliers since our last reporting period. We currently have 28 suppliers outstanding which we will address on an ongoing basis.

**GROWER CONTRACTS:** Agricultural supplier contracts include clauses that prohibit the use of forced or bonded labour and outline the process to be followed if any breaches are identified

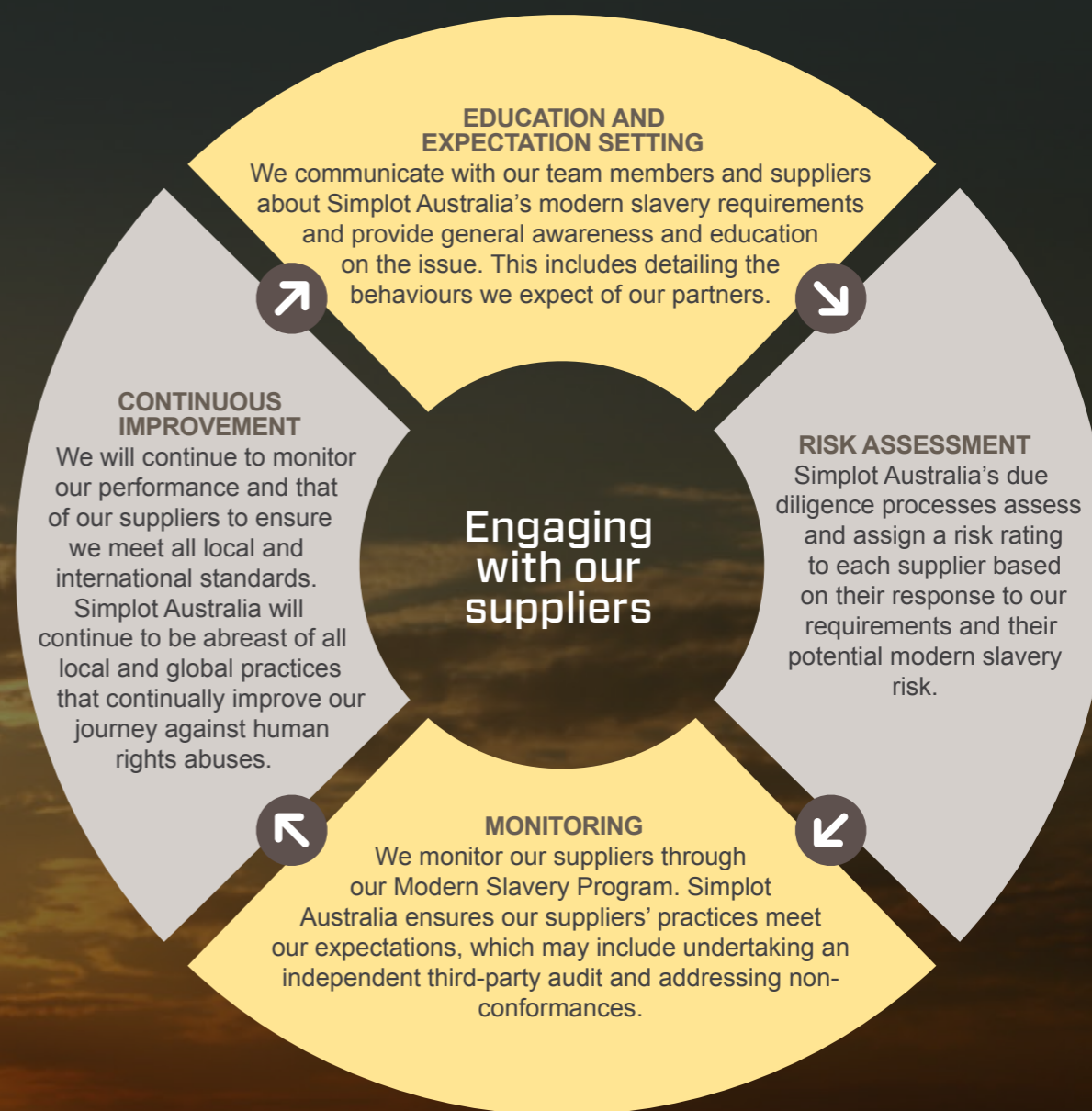
**SUPPLIER ONBOARDING PROCESS:** Simplot Australia requires suppliers to meet a set of predetermined standards in order to do business with us.

**SEDEX MEMBERSHIP AND AUDITS:** Simplot Australia accepts Sedex membership or equivalent risk assessments. Suppliers deemed medium or high-risk may be required to undertake a third-party ethical audit.

**SUPPLIER FOOD SAFETY AND QUALITY AUDIT PROGRAM:** Simplot Australia's Quality team manages a vendor assurance program that includes a supplier audit schedule based on key risk criteria in areas of Food Safety and Quality. While these audits are not specifically designed to identify modern slavery risks, this provides our team the opportunity to observe and report on working conditions.

### ENGAGING WITH OUR SUPPLIERS

Simplot Australia works closely with our suppliers to develop relationships that support mutually beneficial outcomes and strengthen our combined approach to human rights. These relationships are fundamental to addressing and mitigating modern slavery risks and Simplot Australia's approach is underpinned by the following elements:

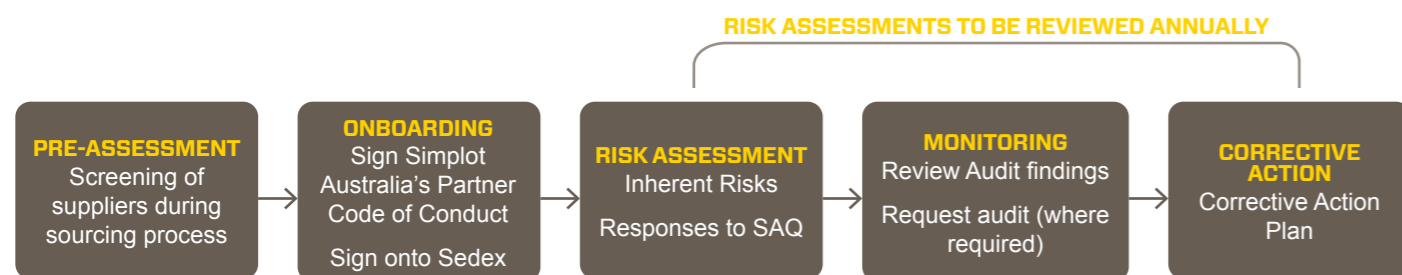




# Assessing the Effectiveness of our Actions

## MONITORING OUR SUPPLY CHAIN

Simplot Australia's due diligence process for suppliers is governed by our Modern Slavery Program framework. Following the Stage One onboarding process of suppliers in the previous reporting period, we have now embedded monitoring supplier compliance into our Program. We identify any areas of potential risk through a Self-Assessment Questionnaire (SAQ) and third-party social audits accessed through the Sedex platform. The diagram below outlines the framework for supplier engagement:



**SAQ:** Once suppliers are linked with Simplot Australia on Sedex, they are required to complete the SAQ on the platform. The questionnaire covers questions on social compliance management systems, including how they identify and address potential modern slavery indicators in their operations. A risk rating is then determined by Sedex and we use this as an indicator for identifying modern slavery risks. We request that suppliers review their SAQ every 12 months to ensure any changes to business operations are captured and the risk adjusted as required.

**THIRD PARTY SOCIAL COMPLIANCE AUDITS:** During this reporting period, Simplot Australia commenced a pilot social compliance audit program with key suppliers to monitor high risk areas identified within our supply chain. We will apply the learnings from the pilot to further requests for audits with other suppliers in future reporting periods.

Similarly, as part of the audit program, we will be reviewing suppliers' most recent social compliance audits that are visible on the Sedex platform. We will use these to identify any areas that indicate human rights violations and may prompt further investigation and escalation within our business. There were 57 audits undertaken by our suppliers in the current reporting period in mutually recognised audit formats and a total of 99 audits since our Program monitoring began in 2019.

We request remediation of any identified non-conformances and any instances of human rights violations will be escalated for executive review.

Simplot Australia is continuing to assess the effectiveness of our activities and identify any areas of improvement in our efforts to minimise the risk of modern slavery in our operations and supply chain. Our progression into the next stage of our Modern Slavery Program this reporting period has improved our understanding of the risks in our supply chain through increased supplier Sedex SAQ completion and visibility of our suppliers' audits. We have also conducted an annual review to ensure that our efforts and focus to mitigate the risks of modern slavery are aligned with industry best practice. We will continue to assess the effectiveness of our actions by partnering with our suppliers, recording

actions and outcomes and working with external industry collaboration groups.

As outlined in Simplot Australia's previous Modern Slavery Statement, we assessed the risks of modern slavery in our operations to be low based on various internal and external verification methods. The two SMETA 4 Pillar Social Compliance audits conducted at our sites this year validated this assessment. This reinforced to us that the actions we have taken to raise awareness, educate and make improvements within our business regarding modern slavery has been effective.

To date, no instances of modern slavery have been identified in Simplot Australia's operations or supply chain.



To date, no instances of modern slavery have been identified in Simplot Australia's operations or supply chain.

# Areas of Future Focus

Simplot Australia is committed to the continuous improvement of our Program to identify and remedy any modern slavery risks in our operations and supply chain. We will continue to work closely with our team members and suppliers to further embed our policies, practices and standards across our business. Through these actions, we believe we will help raise awareness of what constitutes modern slavery and the actions required to implement change. As we continue to build on our activities, we will focus on the following actions over the next reporting period.



## PROGRAM DEVELOPMENT

Continue to achieve Sedex SMETA 4 Pillar accreditation for our manufacturing facilities where risks are identified.

Apply learnings from our Pilot Audit Program, continue to expand audit requests and ensure the governance programs are managing the outcomes effectively.

Strengthen supplier contracts to include clauses ensuring modern slavery compliance.

Review and strengthen Simplot Australia's Partner Code of Conduct.

Continue to roll out our risk assessment process for our agricultural suppliers.

Focus on elevated risks from COVID-19, which includes ensuring the Pacific Observer Program is reinstated to pre-pandemic levels.



## EDUCATION AND LEARNING

Continue Simplot Australia team member training on modern slavery awareness.

Continue to implement learnings from onsite ethical audits across Simplot Australia's manufacturing sites.

Develop a human rights education program with a view to rolling it out in the 2021/22 reporting period.



## INDUSTRY PARTNERSHIPS

Continue to collaborate in industry forum groups and via networking to obtain and share learnings.

Continue to work closely with Simplot Australia customers to identify and manage human rights risks and optimise processes to address them.

Work together with the industry to streamline and standardise the overall industry approach to improve compliance with the Modern Slavery Act (Cth) 2018.

Investigate how Simplot Australia can continue to work with our partners to include human rights measures into responsible seafood sourcing.

## PROCESS OF CONSULTATION WITH RELEVANT ENTITIES

Simplot Australia wholly owns all our consumer brands that relate to this Statement. All our brands are overseen by the one Executive Leadership Team and are governed by the same Modern Slavery Program. Simplot Australia does not own or control any other entities, and therefore this criteria is not applicable to us and consultation with relevant subsidiaries is not required.

## SIMPLOT AUSTRALIA'S MODERN SLAVERY JOURNEY

### 2015

Engaged KPMG to undertake a modern slavery risk assessment on our top 10 SKUs

### 2019

Established framework for Modern Slavery Program at Simplot Australia  
Introduced Simplot Australia's Partner Code of Conduct

### 2020

Commenced preparations for reporting in accordance with the Modern Slavery Act (Cth) 2018

### 2021

Released Simplot Australia first Modern Slavery Statement  
Further evolved Simplot Australia's Modern Slavery Program

### 2022

Release Simplot Australia's 2020/21 Modern Slavery Statement