



# Slavery Statement 2024

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# Modern Slavery Statement

At Bright Food Asia Pacific Pty Ltd (BFAP) we are committed to managing our business ethically and responsibly. We commit to implementing and enforcing effective systems and controls to assess and address modern slavery risks across our operations and supply chains.

We have adopted a set of core Values and Business Principles that govern our activities and interactions with all our stakeholders across the world. We are committed to promoting the application of these Values and Business Principles by our business partners and suppliers.

Our Code of Ethical Sourcing has been designed to promote safe and fair working conditions and it has been guided by the Australian Modern Slavery Act 2018 (Cth) (Modern Slavery Act), and the responsible management of environmental and social issues across BFAP's supply chain.

The Code sets out the standards we wish to see achieved by BFAP and our suppliers. The principle of continuous improvement applies to all aspects of the Code.

BFAP will work collaboratively with our suppliers on the implementation of the Code, which may include joint audits and site visits to assess performance.

BFAP agrees to report on the implementation of and compliance with Modern Slavery Act annually.

BFAP will expect all suppliers to implement our Code across their whole business and within their own supply chains.

# 1. Reporting Entities

BFAP is the principal governing body that manages and controls all its subsidiaries in Australia, New Zealand and Asia (the Group). BFAP provide group operational support across functions such as Information Technology, Technical & Compliance, Corporate Finance and People & Culture.

Business Entity	ACN/ABN	Primary Function
Angus Park Fruit Company Pty Ltd	007 556 836	Procure dried fruits, and process and pack for sales
A View to Food Pty Ltd	130 362 784	Procurement and repack RTE Foods and distribution for sales
Bob & Pete's Bakery Pty Ltd Bob & Pete's Pty Ltd	003 692 993 001 304 374	Procure Ingredients, Process into Bakery goods, distribute and sales
Bright Food Asia Pacific Pty Ltd	152 636 694	Centralised administration support to group
Calendar Cheese Co. Pty Ltd	070 470 870	Procure dairy foods and speciality foods, distribute and sales
Manassen Foods Australia Pty Ltd	001 356 449	Importer, supply & distribution food products
Mildura Fruit Juices Aust Pty Ltd	004 842 755	Procure various fruit types and process and pack for distribution and sales
Pacific Fresh Pty Ltd	003 274 191	Procure various fruit types and process and pack for distribution and sales
Sunbeam Foods Australia Pty Ltd	007 761 604	Procure Dried Fruits, and process and pack for sales
MFCT Pty Ltd as trustee for the Mildura Fruit Company Trust trading as Mildura Fruit Company	57 354 565 744	Procure citrus Fruits and Process, Pack and Distribute for sales

All of these businesses reside in Australia and comply with all the normal business practices and legal requirements as laid down by Federal and local Government legislations and basic good business practice.

## **2. Structure, Operations & Supply Chain**

### **2.1 Structure**

The Chief Executive Officer and Chief Financial Officer of BFAP are Directors and also members of the BFAP board of directors (BFAP Board).

Each individual entity directly or indirectly trades and operates with its own workforce as well as with suppliers and third-party logistics mechanisms locally and around the world but is ultimately governed by the BFAP Board.

### **2.2 Operations**

All entities within the Group operate under a common set of governance policies and programs. This includes the programs through which modern slavery risks in our operations and our supply chains are assessed and addressed. A process of consultation across all Group entities helped guide the drafting of this statement. Each individual entity directly or indirectly trades and operates with its own workforce as well as with suppliers and third-party logistics mechanisms locally and around the world but is ultimately governed by the BFAP Board.

### **2.3 Supply Chain**

As a manufacturer and importer of food products, we procure from a range of local and international suppliers, each of whom also have their own supply chains.

For offshore procurement, entities operate a Supplier Due Diligence Assessment and manage all sourcing via a Supplier HEATMAP as set out by AMFORI and SEDEX.

### 3. Modern Slavery Risks

BFAP is committed to supporting and upholding human rights and implementing measures to alleviate modern slavery risks in our operations and supply chain.

According to the Modern Slavery Risk Global Index, our Head Office and warehouses in Australia are considered low risk jurisdictions. By complying to Australian legislative frameworks, we are placed in a very low risk environment.

According to our Code of Ethical Sourcing Policy, in conjunction with Modern Slavery Act, we aim to only conduct business with manufacturers that practice and follow the SMETA 2 Pillars Principles and the Modern Slavery Act.

We work closely with our suppliers to ensure they meet the required standards and are committed to a continuous improvement approach to ensure we identify further ways BFAP can improve the overall supply chain performance in this area.

## 4. Action Taken to Understand and Address Modern Slavery Risk

BFAP operate under 3 supply arrangements:

1. **Corporate Brand Suppliers** - third party providers who manufacture products on our behalf which are sold under company owned brands. Corporate Brand Suppliers are required to meet Binding Corporate Rules certification (BCR) and be SEDEX member companies who have completed SMETA certification. To ensure compliance:
  - a) Our Code of Ethical Sourcing Policy incorporates the Modern Slavery Act 2018
  - b) Code of Ethical Sourcing Policy has been signed by all product suppliers
  - c) All product suppliers are required to have at least a 2 Pillar SEDEX and SMETA accreditation and we will always strive here to achieve 4 Pillar accreditation
2. **Principal Partners** – third party companies who engage BFAP to distribute their goods under their own brand names. They may have SEDEX and SMETA certification, but are required, at a minimum, to complete and comply with the BFAP Supplier Self-Assessment (F2) requirements which cover the following criteria on ethics and environment to ensure that these matters are committed to by the producer of goods supplied to BFAP.

For third party production sites where goods are produced and sold by BFAP, the following key ethics and environment matters are considered -

- Does the business have an Environment Protection Plan
- Is this site Ethically audited by an external body
- If yes, name of Certification Body: e.g SEDEX/AMFORI etc
- Are all local labour and environmental regulations complied with
- Have any labour related matters been identified in last 12 months
- Have any environmental matters been identified in last 36 months
- Does the business have a carbon footprint analysis
- Is water minimisation practiced on site
- Are the following considered to minimise impact on the environment:
  - Air emission
  - Water usage
  - Solid waste disposal
  - Hazardous chemicals storage and disposal
- All workers employed are legal employees (as per country regulations)
- All employment is freely chosen
- Forced, bonded or involuntary prison labour is not acceptable
- Employees have regular notice periods applicable to contracts

- Workers can bargain collectively (if legally allowed)
- Employer has an open attitude to trade unions or similar bargaining activity
- Utilisation of child labour is not acceptable (Child age as per ILO 138)
- Wages paid is enough to provide basic needs
- Hours worked are within industry standards
- Discrimination in employment practices is not acceptable
- Harassment and or abuse is not acceptable
- Bribery and or corruption is not acceptable
- Is any labour hire agency used.

BFAP will not deal with suppliers of goods to its business where the above cannot be confirmed or cannot be provided.

**3. BFAP Own Brands** – these are company owned businesses that fall under our direction and control which produce goods under company owned brands. We ensure common policies and procedures are adopted across the Group which include:

- a) Labour standards based on ETI base code
- b) Frameworks to ensure health & safety and wellbeing of all team members
- c) Mandatory work rights check
- d) Minimisation of agency labour engagement
- e) Code of Conduct Policy enforcement
- f) Human Rights Policy implementation
- g) Education roll out on Modern Slavery Policy across relevant staff



## 5. Assess Effectiveness of Actions

We will continually assess the effectiveness of our action and the risks by:

- a) Ensuring suppliers acknowledge and agree to abide by our Code of Ethical Sourcing. Signed confirmation will be required on an annual basis and added to our internal register.
- b) Annual records of BRC, SMETA and/or SA8000 audits from suppliers, will be sourced and reviewed.
- c) Conducting regular visits to manufacturing sites to ensure compliance.
- d) Working with our suppliers to ensure continuous monitoring and continued progress in improving our response to Modern Slavery risks.

Manassen Foods Australia Pty Ltd (MFA) for example rank high risk supply countries by spend from their business, noting where there is higher spend, they have more influence on the supplier. They are committed to physical visits to the suppliers for audit purposes on an annual basis to ensure compliance to the BFAP Code of Ethical Sourcing. Higher ranked countries on the risk scale are audited by MFA's own employees, whilst for lower ranked countries MFA audit these suppliers using an external in-country auditor.

Current status of audits for key MFA suppliers is listed in the table below.

Country	No. of Major Suppliers	High Risk Supplier Countries: Rank of Spend	Last Visit	Visit Frequency
Thailand	3	1	May-25	Annual
China	5	2	May-25	Annual
Vietnam	1	3	Oct-23	Annual
Dubai	1	3	External audit (Principal partner)	Annual
Pakistan	1	4	External audit	Annual
Jordan	1	4	External audit	Annual
Turkey	1	5	Oct-23	Annual

## 6. Consultation Process

BFAP is managed directly by the Senior Management Team and the BFAP Board.

Our Code of Ethical Sourcing has been signed off by the Group General Manager – Technical & Compliance and approved by the BFAP Board.

The Modern Slavery Statement has been approved by the BFAP Board and signed by the BFAP Directors.

## 7. Statement of Approval

This statement has been approved by the BFAP Board of Directors

Bright Food Asia Pacific Pty Ltd (ACN 152 636 694)



**Richard Meagher**

**Chief Executive Officer and Executive Director of the Board**

**Bright Food Asia Pacific Pty Ltd**



**Peter Gunning**

**Chief Financial Officer and Executive Director of the Board**

**Bright Food Asia Pacific Pty Ltd**