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ZESPRI: MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Year ending 31 March 2026

1. OVERVIEW

Zespri International (Australia) Pty Limited ("ZIAU") (the voluntary reporting entity) is a subsidiary of Zespri Group Limited ("Zespri"). ZIAU does not own or control any entities, but consulted with Zespri in the development of this statement.

Zespri is 100% owned by current and past New Zealand kiwifruit growers. Zespri was formed in 1997 as a global marketing organisation for New Zealand kiwifruit and now distributes premium quality kiwifruit to more than 50 countries worldwide. Our purpose is to help people, communities and the environment around the world thrive through the goodness of kiwifruit. Zespri's global operating revenue was $6.1 billion in 2025/26.

Zespri is committed to ensuring Zespri kiwifruit is grown and distributed in a socially responsible way, and that the people who help grow our kiwifruit are treated fairly. People who choose to work in our industry are a critical part of our success and we want them to succeed. In our New Zealand supply chain, we work with the New Zealand Government and New Zealand Kiwifruit Growers Inc ("NZKGI") to do everything we can to combat exploitation of workers and create an industry where people can thrive. Globally, we have invested in systems which allow us to identify and take action over any cases of worker exploitation, with more work underway.

Our core Zespri compliance standards for suppliers protect our industry and our people, and all growers and industry contractors must hold Good Agricultural Practice and Global Risk Assessment on Social Practice ("GLOBALG.A.P. and GRASP") certification and meet the requirements which underpin on-orchard activities.

2. OUR BUSINESS STRUCTURE & SUPPLY CHAIN

The New Zealand kiwifruit industry is regulated by the Kiwifruit Industry Restructuring Act 1999 ("the Act") and the Kiwifruit Export Regulations 1999 ("the Regulations"). The Act and the Regulations established Zespri Group Limited as the primary exporter of New Zealand-grown kiwifruit to all countries other than Australia.

Zespri is authorised by New Zealand growers to produce and source kiwifruit outside of New Zealand and this part of the business is known as Zespri Global Supply or ZGS. Following from a successful Producer vote at the end of 2024 to expand off-shore growing, ZGS is now authorised to licence the production of up to 420 hectares of SunGold kiwifruit per year over a six year period across Italy, France, Japan, South Korea and Greece in addition to the 5,000 hectares originally approved in 2019. ZGS is also authorised to licence the production of up to 1,000 hectares of other new varieties and procure up to 20 million trays of green kiwifruit to support Zespri's strategy to supply the world's leading portfolio of kiwifruit for 12 months of the year.

In 2025/26, Zespri sold 248.1 million trays of kiwifruit, an increase from the 220.9 million recorded in 2024/25. Global revenue from fruit sales also increased from $5.03 billion to $5.9 billion. This was made up of a total sales volume of 218 million trays of New Zealand and 32.3 million trays of non-New Zealand kiwifruit.

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NEW ZEALAND

The New Zealand kiwifruit supply chain produces Green, Organic Green, SunGold, Organic SunGold, Sweet Green and RubyRed kiwifruit varieties. These are grown from approximately 3,404 registered orchards that supply fruit to 14 postharvest suppliers, running around 39 packhouses and about 64 coolstore facilities. Orchards and postharvest facilities are independently owned and managed.

There are over 2,800 kiwifruit growers with more than 16,000 hectares of kiwifruit in production. As most recently reported by NZKGI in its annual labour report, the industry employs around 10,000 permanent employees and 24,500 seasonal employees at the peak times. New Zealanders fill the majority of permanent roles.

Around 78 percent of Zespri kiwifruit is grown in the Bay of Plenty but is increasingly spreading around New Zealand as higher-returning SunGold grows profitably in a wider range of locations.

In the 2025/26 season, Zespri directly returned over $3.6 billion in payments to growers around New Zealand, including Bay of Plenty, Northland, the East Coast, Nelson and Waikato.

ZESPRI GLOBAL SUPPLY ("ZGS")

To support our global 12-month supply strategy, we have long-term partnerships with growers in Japan, Korea, Italy, Greece and France to provide SunGold to market in months when New Zealand kiwifruit is not available. We also procure Green kiwifruit that meets Zespri standards from Italy and Greece. A small amount of SunGold grown in Italy is exported to the UK. Starting from 2026, we entered long-term partnerships with two suppliers in Italy to provide Zespri Red to the European market when New Zealand kiwifruit is not available.

In 2025/26 ZGS delivered 32.3 million trays, a significant increase from the 26.6 million trays in 2024/25. This was made up of around 24.7 million trays of SunGold kiwifruit and a record 8.32 million trays of Green. This led to an increase in ZGS revenue from $654 million in 2024/25 to $875 million in 2025/26.

Zespri works with more than 1,200 growers in Italy, with four postharvest suppliers for SunGold and 18 for Green. There are 12 SunGold and 27 Green packhouses which operate 13 SunGold and 28 Green coolstores. Approximately 60 percent of the SunGold in Italy is sourced from the Lazio region, with 21 percent from Emilia Romagna and 8 percent from Calabria. The rest is grown in Veneto, Lombardia, Campania and Basilicata.

3. POLICIES

Zespri has a comprehensive Risk Management Policy based on the Australia-New Zealand risk management standard AS/NZS ISO 31000:2018 and a risk register developed by Zespri Management and reviewed by the Audit and Risk Management Committee (ARMC). These documents govern the processes Zespri uses to continually monitor and assess risks. The Board maintains an issue watch register to identify and regularly update them on current risk items in the business. The ARMC receive focused updates on internal audit matters, as well as regular updates on risk areas.

Zespri maintains a 'Social Responsibility Policy' to demonstrate its commitment to operating a socially responsible business and protecting the rights of workers in our industry. This policy is supported by Zespri's Global Supplier and Partner Code of Conduct and is underpinned by the International Labour Organisation (ILO) Core Labour Conventions. Growers and contractors are required to demonstrate they also hold a 'Human Rights Policy' as a part of their GLOBALG.A.P. and GRASP certification.

Docusign Envelope ID: 5A35AE5A-CD5A-8142-827D-70C79D129CC3

Zespri also expects suppliers and partners to acknowledge Zespri's Global Supplier and Partner Code of Conduct which sets the expectation that business will be conducted legally, responsibly, ethically, with integrity, honesty and transparency. This Code makes it clear that if a Supplier or Partner becomes aware of unlawful or suspected violations of the Code, they must report this to Zespri's Legal or Risk & Assurance teams.

4. DUE DILIGENCE PROCESSES

Zespri takes supply chain transparency seriously and undertakes risk-based due diligence on suppliers and other participants in the Zespri supply chain, as well as setting clear expectations of our immediate suppliers to take similar steps in their own operations.

Zespri's Global Supplier and Partner Code of Conduct sets the expectations for our suppliers and partners in relation to ethical business conduct, labour standards, human rights, health and safety, environmental responsibility, anti-bribery and anti-corruption.

As part of the onboarding process for suppliers of goods and services, Zespri conducts a risk-based supplier due diligence assessment. All prospective suppliers are required to undergo due diligence covering areas such as modern slavery and human rights, employment practices, workplace conditions, financial integrity, privacy, cyber security and other risk factors relevant to the proposed engagement. Suppliers may also be requested to provide supporting documentation, including policies, procedures, certifications, audit reports, and evidence of relevant management systems.

Information gathered through the due diligence process is reviewed by relevant risk owners and subject matter experts. Depending on the nature of the supplier and the risks identified, additional assessments, enhanced due diligence, remediation requirements, contractual controls, or executive approvals may be required before a supplier is approved. Where risks cannot be adequately mitigated, Zespri may elect not to proceed with the supplier relationship.

This risk-based approach helps Zespri identify, assess, and manage potential modern slavery and human rights risks before entering supplier relationships and supports our broader commitment to responsible sourcing and ethical business practices.

In New Zealand, where contractors are widely used on orchards, prospective contractors who want to provide services to orchards that supply Zespri must register in the Zespri GLOBALG.A.P Contractor Programme ("the Programme"). Registration is not automatic and requires contractors to undergo a vetting process. This includes ID verifications, background checks, financial and business checks and an applicant interview. This allows Zespri to evaluate an applicant's ability to comply with the Programme and reduces risk of labour exploitation in the supply chain.

Upon approval, contractors are required to undergo a three-tiered inspection process to demonstrate they have business systems and processes to meet the compliance expectations of the Programme. Contractors who successfully complete this process are issued with a Compliance Verification Assessment ("CAV"). Before growers engage a contractor, they are expected to sight and verify their contractors' CAV. This provides assurance to our growers and industry that their contractors have been approved.

Zespri remains committed to regularly reviewing the Programme standards, and terms and conditions, to ensure they reflect any changes to the international standards for GLOBALG.A.P. and GRASP, the requirements of off-shore customers and Zespri's own expectations of those contracting in our supply chain.

5. RISK ASSESSMENT AND MANAGEMENT

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Zespri expects kiwifruit industry employers to comply with all employment laws and regulations. In New Zealand, Zespri works with NZKGI and the New Zealand Government to ensure industry compliance with applicable labour laws and standards.

Our key risks with regards to workers in the industry have been assessed as including:

- Exploitation of seasonal and migrant workers.
- Underpayment of wages.
- Deceptive recruitment.

The protection of seasonal and migrant workers is a particular focus for Zespri. The New Zealand industry relies on a substantial workforce of overseas workers – mostly from the Pacific - for both on-orchard and packhouse labour. The industry also relies on labour contractors for seasonal on-orchard activities such as summer pruning in October-to-November and harvesting, which runs from around March to June.

Risks are identified through a variety of channels. The industry has many consultation groups where issues and expectations around matters such as social and ethical business practices are discussed and agreed.

Regular audits are conducted by independent audit bodies throughout the supply chain, which helps to identify labour exploitation indicators. When non-compliances or risks are identified, Zespri works with suppliers to improve social responsibility practices, with the last resort being revoking their certification and/or refusal to take fruit, goods or services.

Zespri also has a dedicated global Speak Up line that allows anyone to report unethical or illegal behaviour. Complaints that come through the Speak Up line, the industry Compliance team or other avenues are documented, triaged and managed with support from a third-party provider which specialises in investigating labour exploitation.

Where suppliers are believed to have breached regulations, law or Zespri's own ethical and social policies, Zespri reports to the relevant government agencies as appropriate.

During the financial year ending 31 March 2026, Zespri undertook the following steps to ensure the risk of slavery and human trafficking can be identified and addressed if it is found in our supply chain.

5.1 Continuing to require all growers to be certified against GLOBALG.A.P. which is an internationally recognised independent certification system that covers social practice in the fruit and vegetable industry through the GLOBALG.A.P Risk Assessment on Social Practice ("GRASP") module. Compliance with GLOBALG.A.P and GRASP is independently certified by professional certification bodies globally.

5.2 Requiring suppliers of goods and services to Zespri to acknowledge Zespri's Supplier and Partner Code of Conduct. This obliges Zespri suppliers and partners to (among other things):

- Comply with all applicable laws.
- Provide a workplace free from discrimination, harassment or any other form of abuse.
- Treat employees fairly, including with respect to wages, working hours and benefits.
- Prohibit all forms of forced or compulsory labour.
- Prohibit the use of child labour and provide safe and healthy working conditions.

5.3 Maintaining a social responsibility policy to set the expectation of Zespri and Zespri's customers for all suppliers globally. This policy recognises and respects different international laws, stating that the highest level of protection for workers will be adopted and implemented.

Docusign Envelope ID: 5A35AE5A-CD5A-8142-827D-70C79D129CC3

5.4 Continuing to operate a dedicated global Speak Up line for anyone to report unethical or illegal behaviour.

5.5 Continuing to enhance the Zespri GLOBALG.A.P. Contractor Programme to ensure all New Zealand on-orchard labour complies with New Zealand law and relevant international standards.

- Contractors must be registered with Zespri and hold a current CAV showing they meet GLOBALG.A.P. and GRASP requirements.
- Contractors are audited annually, with additional inspection requirements relevant to risk indicators.
- If growers use contracted labour, they are required to sight their contractors' CAV, indicating their contractors have also been assessed under GLOBALG.A.P and GRASP. Where concerns are raised, Zespri employs independent investigators to investigate and on-reports any non-compliant activity to the relevant government agencies.

5.6 In late 2025, Zespri commissioned an independent strategic review of labour compliance across the New Zealand kiwifruit industry. The review is intended to evaluate the Zespri GLOBALG.A.P. Contractor Programme and broader labour compliance frameworks, identify gaps and emerging risks, consider appropriate governance options, and develop recommendations to ensure the system remains credible, robust, and fit for purpose as expectations continue to evolve. Zespri will assess the findings of the review in consultation with industry participants and develop effective pathways to address any gaps or risk areas identified at an industry level and will report on this in the next financial year.

5.7 Continuing to work closely with all New Zealand post-harvest operators to maintain SEDEX registration, complete annual self-assessment questionnaires, and undertake SEDEX Members Ethical Trade Audits (SMETA) where required. All New Zealand post-harvest facilities have committed to completing SMETA audits, with a further five facilities audited during the reporting period. Italian SunGold suppliers are also required to undergo independent SMETA audits, while Green Kiwifruit suppliers are required to declare compliance with SEDEX principles, supporting consistent social responsibility expectations across Zespri's global supply chain.

- SEDEX is a leading global ethical trade organisation that promotes responsible business practices and improved working conditions across supply chains. SMETA audits are conducted against the Ethical Trading Initiative (ETI) Base Code and SEDEX audit methodology, with audit reports published on the SEDEX platform to support transparency and information sharing. These independent assessments provide assurance of labour practices and social responsibility systems, demonstrating the kiwifruit industry's commitment to ethical employment practices, worker welfare, and compliance with labour standards.

5.8 In New Zealand, continuing to endorse the Recognised Seasonal Employer (RSE) scheme which alleviates labour shortages in the horticultural industries, and directly supports community development across the Pacific by providing seasonal employment as well as pastoral care and support.

5.9 Continuing to work with a New Zealand pan-industry governance group which is charged with ensuring appropriate steps are in place to drive ethical employment practices across the industry.

5.10 Continuing to provide an Ethics & Compliance Learning Centre that provides online compliance-related training courses for all Zespri staff. This covers training in recognising and reporting unethical labour practices (including Modern Slavery) for relevant staff. Compliance is an area that we must get right to grow our business sustainably into the future and protect the

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promises we make. It requires business integrity, ethical decision making and an internal culture that supports doing the right thing.

5.11 Establishing a Social Responsibility Taskforce for ZGS in mid-2023 to enhance its compliance framework across Europe, with an initial focus on Italy as its main production region in the Northern Hemisphere. This initiative includes the creation of a new Community Engagement position, aimed at clearly communicating Zespri's expectations regarding worker welfare throughout its supply chain.

- Introducing enhanced training as part of our commitment to protecting workers, with sessions delivered to gold and red growers and suppliers on Zespri's social responsibility expectations at least yearly.
- Collaborating with Stronger Together, an international non-profit organisation with specific expertise in responsible recruitment, fair work and approaches to tackling labour exploitation.
- Continuing to build internal capability, with members of our Italy-based team recently completing specialised training to strengthen Zespri's ability to conduct direct, risk-based supply-chain social responsibility assessments as part of our quality management system.
- Establishing a ZGS Europe Internal Social Compliance Working Group. The group is responsible for monitoring social compliance and conducting annual internal and external risk assessments across the ZGS Europe supply chain, including orchards, nurseries, packhouses, and transportation providers. It also reviews and manages reported non-conformances, ensuring appropriate follow-up actions are implemented.

6. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Zespri regularly reviews and assesses the effectiveness of its policies, codes and operating procedures as part of our risk management framework. Zespri will continue to review its policies and procedures to ensure that it can meet its commitments and strive towards meeting the highest ethical standards.

ZESPRI'S AUDIT AND RISK COMMITTEE ("ARMC")

The ARMC's primary function is to assist the Zespri Board in fulfilling its oversight responsibilities in relation to risk management, internal audit, external audit, compliance and financial reporting.

The ARMC consists of at least three board members appointed by the Board of Directors as a sub-committee of the Board. Members of Zespri Management and Executive attend meetings.

As part of its compliance oversight function, the ARMC:

- Provides oversight of the Ethics & Compliance programme strategy and activities.
- The ARMC oversight:
  - Is risk based;
  - Includes periodic review of the programme design and work plans;
  - Includes periodic review of programme implementation and effectiveness; and
  - Receives information from Ethics & Compliance personnel.
- Evaluates the ethical implications of proposals raised by senior management.
- Demonstrates willingness to challenge senior management and hold executives to account in relation to Ethics & Compliance issues.
- Evaluates senior management based on executives' efforts to demonstrate ethical leadership and promote a culture that encourages ethical conduct and a commitment to compliance with the law.
- Reviews and approves the company code of conduct at least every three years.

Docusign Envelope ID: 5A35AE5A-CD5A-8142-827D-70C79D129CC3

- Meets with the Head of Risk & Assurance and other management in separate executive sessions to discuss any matters that the ARMC or these groups believe should be discussed privately with the ARMC.
- ARMC's self-evaluation includes consideration of its performance in addressing ethical issues that pertain to the organisation, the industry or to the Board itself.

7. TRAINING ON MODERN SLAVERY AND HUMAN TRAFFICKING

Zespri staff are regularly trained across policies to ensure communication and education of the latest compliance requirements and expectations. Our policies are underpinned by audits and investigations conducted by an internal audit function, with exceptions being reported to the Audit and Risk Management Committee.

Zespri continues to work closely with the Labour Inspectorate, Immigration New Zealand and Inland Revenue to ensure that Zespri's approach to addressing modern slavery and human trafficking continues to evolve in line with government expectations.

8. CONCLUSION

Zespri is committed to continuous improvement and has established an industry working group to focus on strengthening social responsibility practices. Zespri will continue to assess and adapt strategies in this constantly evolving space.

This Modern Slavery & Human Trafficking Voluntary Statement was approved by the Board of Zespri International (Australia) Pty Limited on 16 September 2026.

DocuSigned by:
Himanshu Arora
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Himanshu Arora
Director
Zespri International (Australia) Pty Limited