

Mulgowie Farming Company

Modern Slavery Statement

Dated: 26 February 2021

“Mulgowie Farming Company and its associated entities have a zero-tolerance policy to any form of modern slavery in its supply chains or the operations of its suppliers”

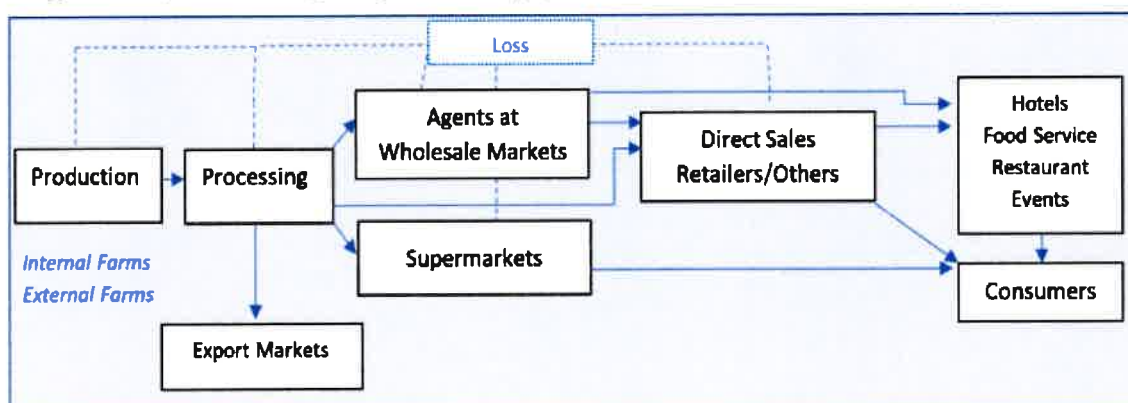
About Mulgowie Farming Company

Mulgowie Fresh Pty Ltd ACN 100 928 014 trading as Mulgowie Farming Company of 35 Mulgowie School Road, Mulgowie, 4341 Queensland (**Mulgowie**) is a private Australian company producing Sweet Corn, Green Beans and Broccoli servicing major Australian and International Wholesale and Retail customers. Mulgowie proudly sustains a competitive advantage across all three product categories by supplying year-round high-quality produce delivered via a vertically integrated supply chain with strong stakeholder relationships.

Mulgowie employs over 650 people across its operations through two related entities. This includes on-farm staff across 6 locations and centralised support staff located in Brisbane.

Mulgowie’s market continues to grow as populations increase and consumers become more mindful and educated in health and nutrition. Notwithstanding this, retailers and consumers are placing increasing demands on producers to supply produce that meets food safety and quality parameters and is produced ethically. Many export customers demand the same quality and ethical compliance. For these reasons, Mulgowie is aware of its modern slavery requirements.

A high-level view of Mulgowie’s Supply Chains is set out below:



Additionally, Mulgowie procures products and services from a broad range of supply chains including the food, agriculture, fuel and energy, fixed plant, mobile fleet and information technology sectors.

Policy framework

Mulgowie supports the protection of human rights and is committed to defending the rights of all people it interfaces with including its employees, the communities in which it operates, its customers, and those within its supply chains.

As Mulgowie operates in certain international markets and purchases a range of goods and services globally (primarily through third party Australian providers who do), it understands the risks of modern slavery in its supply chains.

The international markets Mulgowie operates in include:

- New Zealand
- Singapore
- Hong Kong

- Korea

Other than Australia, the countries Mulgowie purchases goods and services directly from include:

- USA
- New Zealand

Mulgowie is aware that modern slavery has the potential to exist in supply chains in certain ways, including in the form of:

- Slavery
- Servitude
- Forced and compulsory labour
- Forced marriage
- Human trafficking
- Debt bondage
- Abuse of minimum wage requirements
- Employment practices that are discriminatory

whether in relation to adults or children.

As a business operating in the agriculture industry, Mulgowie is attune to the potential for risk in the use of forced labour and abuse of minimum wage requirements in the collection of supply chains for the growing and harvesting of Sweet Corn, Green Beans and Broccoli. Noting Mulgowie's due diligence processes regarding employment, risks include:

- Third party labour hire and employing people in accordance with the law
- Transparency with employees and labour hire providers
- Transparency and ongoing notification by suppliers regarding supply chain changes

We are committed to taking appropriate action to mitigate against the risks of modern slavery occurring in our supply chains or in any part of our business.

Mulgowie's management of modern slavery risks falls within its remit to ensure ethical trading and protecting human rights. Mulgowie is a member of the Supplier Ethical Data Exchange (**Sedex**) and follows the Sedex Members Ethical Trade Audit methodology (**SMETA**). Mulgowie is committed to acting ethically and with integrity, upholding human rights and providing fair working conditions and environmental protection. In accordance with the expectations of our customers, the community, and the requirements of the law, we endeavor to always operate responsibly within the community and to implement and enforce effective systems and controls to mitigate against the risk of modern slavery practices occurring anywhere in our own business or in any of our supply chains. We expect the same from all our suppliers, contractors and other business partners.

The core documents that guide Mulgowie's commitment to human rights protection are Mulgowie's Sustainable and Ethical Recruitment Employment Procedure, Code of Conduct, Food Safety, Quality Policy and SMETA Procedure and Ethical Sourcing Procedure. Mulgowie follows the principles established under these documents as approaching essential standards of:

- personal and corporate conduct
- the behavior expected of all who work for or with Mulgowie including directors, employees, contractors, suppliers and business partners

Further, the documents, specifically the SMETA Procedure, set a framework for identifying issues associated with modern slavery within Mulgowie's supply chains. These documents are supported by other Mulgowie procedures, policies and guidelines to ensure the highest levels of ethical behavior in the business.

Mulgowie's corporate documents reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our supply chains.

Under Mulgowie's contractual and other arrangements for procurement, any consultants, agents, contractors or suppliers are requested to comply with Mulgowie's modern slavery requirements. Mulgowie's standard terms and conditions also

require minimum standards in ethical business practices, safety and environment are upheld.

Mulgowie requests that all its suppliers enter a contract or sign a statutory declaration (or equivalent), committing to work with Mulgowie to eradicate modern slavery from the supply chains mutually operated in.

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we provide training to our staff around the risks of modern slavery in supply chains.

Governance

Mulgowie is committed to sound corporate governance and views it as critical to its long term, sustainable success. A core intention of Mulgowie is to seek to create value for all stakeholders. Good governance is an embedded philosophy within Mulgowie and is the collective responsibility of all levels of management through to the Board.

In addition, Mulgowie consciously includes risks associated with human rights and modern slavery as part of its approach to risk management and compliance. This risk is overseen by a Mulgowie Board sub-committee, the Audit & Risk Committee (**ARC**). The ARC will seek updates on Mulgowie's modern slavery exposure when needed and will provide oversight on the annual review of this Modern Slavery Statement.

Governance framework

Mulgowie's Board of Directors is responsible for ensuring that the company achieves its strategic and business objectives ethically, responsibly and within its legislative and regulatory obligations. Accordingly, the Board is accountable to the company Shareholders for the attainment of the company's Vision and Purpose, and ongoing sustainability. The Board achieves this mandate through the following key functions:

- Setting the strategic direction and governance of the company and monitoring management's implementation of that strategy
- Monitoring the company's operational and financial performance including the approval of annual budgets
- Setting the Risk Appetite of the company
- Ensuring that effective Audit and Risk Management systems are in place to protect the company's assets and mitigate against risk
- Monitoring the company's compliance with Legal and Regulatory obligations
- Appointing the CEO and monitoring performance against objectives
- Liaising with and accounting to Shareholders for the company's performance
- Engaging with key stakeholders, as required
- Representing the company in formal interactions with key stakeholders and ensuring the reputation of the company is upheld

Mulgowie's Board of Directors comprises of five Non-Executive Directors, including the Board Chair. The Board convenes for a minimum of 7 Board meetings each calendar year.

The ARC is a Board sub-committee which convenes every three months and comprises the Directors, including the ARC Chair (who is not the Board Chair). Relevant Executives, including the CEO, attend all meetings

Mulgowie's Board of Directors adhere to a Board Charter which sets out the key roles and responsibilities of the board.

Mulgowie's suppliers

Mulgowie is committed to working with its suppliers to eradicate modern slavery from Mulgowie's supply chain. To ensure all those in our supply chain and contractors comply with our values we have in place a rigorous supply chain compliance program. This consists of, where possible, implementation of Mulgowie's:

- SMETA methodology
- Approved Supplier Checklist
- Relevant Supply and Purchase Contracts

Due Diligence & Remediation

Mulgowie has systems in place which aim to:

- identify and assess potential risk areas in our supply chains
- remediate and mitigate the risk of slavery occurring in our supply chains
- act on potential risk areas in our supply chains
- monitor potential risk areas in our supply chains
- protect whistleblowers
- where appropriate, cease trading and report to authorities

Due diligence and remediation actions being taken by Mulgowie entities include, where possible:

- implementation and actioning of the SMETA methodology
- review of supplier and purchasing contracts
- implementation of Mulgowie's approved supplier checklist
- implementation of Mulgowie's supply and purchasing contracts

To the extent possible, Mulgowie works with its stakeholders to identify and understand the impacts and associate risks of activities within its business and supply chain.

A key aspect of this process is ensuring sufficient rigor in Mulgowie's supplier approval process. As noted, all suppliers are, where possible:

- required to comply with Mulgowie's standard Supply and Purchase Contracts which contain minimum standards for ethical business practices
- requested to enter a contract or sign a statutory declaration (or equivalent), committing to work with Mulgowie to eradicate slavery from the supply chains mutually operated in.

Mulgowie's due diligence process is initiated by a risk assessment of suppliers prior to any contract award. The risk assessment is performed by procurement specialists and requires suppliers to provide information regarding ethical sales and human rights.

Mulgowie has mechanisms in place for employees and third parties to anonymously report suspected or actual illegal activity or breaches of Mulgowie's Ethical Sourcing Policy, including a whistle-blower system, and an internal process that deals with how modern slavery complaints are addressed.

"Mulgowie established an 'Anti-Slavery Management Working Committee' in FY20-21"

The specific responsibilities of Mulgowie's Anti-Slavery Management Working Committee, reporting to the CEO who, in turn has responsibility to the Board, include ensuring:

- implementation of the SMETA methodology
- implementation of all human resources policies, procedures and guidelines
- reviewing supplier and purchasing contracts
- implementation of Mulgowie's approved supplier checklist
- implementation of Mulgowie's supply and purchasing contracts

Industry Participation

Mulgowie is a committed member of various industry bodies, including:

- Sedex and follows the SMETA methodology
- Horticultural Industry Australia

- Growcom
- AUSVEG
- Produce Marketing Association

Mulgowie's Performance

During FY20-21 Mulgowie has or has sought to:

- establish a Modern Slavery Management Committee comprising senior managers to effectively implement the Modern Slavery Act 2018 requirements. The Modern Slavery Committee has been involved in the development of this Modern Slavery Statement
- undergone an annual SMETA audit (and will continue to do so to remain a Sedex member)
- conduct company-wide staff awareness training
- sought to collaborate with various tiers of government and relevant authorities to ensure a dialogue is created with them to show Mulgowie's support for the Modern Slavery Act 2018
- assess potential suppliers in relation to human rights compliance. Whilst an ongoing process, to date none have been found to be in breach
- engage with its key suppliers and fellow industry participants
- implemented additional risk assessments to ensure human rights risk, specifically those relating to modern slavery are mitigated in the business

Mulgowie's effectiveness in combatting slavery

To the best of our knowledge, we do not anticipate that any of our respective or relevant operations are highly susceptible to risks of modern slavery.

Where we consider any potential risks may exist, we assess those risks by seeking to ensure:

- implementation of the SMETA methodology
- implementation of all human resources policies, procedures and guidelines
- review supplier and purchasing contracts
- implementation of Mulgowie's approved supplier checklist
- implementation of Mulgowie's supply and purchasing contracts

When or if risks are identified, we seek to manage those risks to our organisation by maintaining consistent and high standards of due diligence and risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate in, regardless of whether the environment or the suppliers with whom we work are more or less vulnerable to modern slavery.

Mulgowie's consultation with its business

Mulgowie has consulted within its business by:

- holding internal team meetings;
- Mulgowie's Boards and ARC meeting sufficiently regularly to remain briefed on the business's activities; and
- reviewing necessary internal contractual terms and conditions and the associated corporate structure.

Mulgowie's continued commitment

We intend to take the following further steps to combat modern slavery in our operations and supply chain in the 2021 financial year:

Item No.	Action
1.	Continue to review and update internal policies, procedures and guidelines.
2.	Continue to review the current quality assurance process to ensure it meets best practice.
3.	Continue training of employees and relevant supply chain stakeholders as applicable.
4.	Continued engagement with suppliers to ensure they comply with Mulgowie's Modern Slavery Act requirements.
5.	Seek to engage with all tiers of government, other organisations and businesses to share key learnings and approaches to combatting modern slavery.
6.	Regular review of compliance to the Modern Slavery Act and annual reviews and updates of Mulgowie's Modern Slavery Statement.

This Modern Slavery Statement is made by Mulgowie Fresh Pty Ltd ACN 100 928 014 trading as Mulgowie Farming Company for the financial year ending 2021.

This statement was approved by Mulgowie's Board of Directors on 26 February 2021.

Chairperson to sign:  Date: 26 February 2021

Please print name: Peter Wayne Trimble

Mulgowie Fresh Pty Ltd ACN 100 928 014

Date: 26 February 2021

Document Version Control

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