A photograph of a young green seedling with two leaves growing out of dark, rich soil. The scene is illuminated from the top left, creating a bright glow and a mist of fine particles or water droplets in the air, suggesting a nurturing environment.

**2019/20**  
**Modern Slavery**  
**Statement**



## At Simplot We Contribute to **Feeding our World** by Bringing Earth's Resources to Life.

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 “Simplot”, the “Company”, “our business”, “organisation”, “we”, “us”, and “our” refer to Simplot Australia, except where the context otherwise requires.

Simplot’s 2019/20 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 for the

foreseeable future, and covers the period 1st September 2019 to 31st August 2020.

Each Simplot entity is covered by Simplot policies, procedures and systems, including those relating to supply chain management, contracting, purchasing and human resources.

Simplot 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 and present.

This statement was approved by the board of Simplot Australia on 12th February 2021.

**Graham Dugdale**  
Managing Director Simplot Australia  
18th March 2021

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## I am pleased to share Simplot Australia’s first Modern Slavery Statement,

which outlines the actions we are taking and the areas we will continue to focus on to address this complex issue.

We are a leading agricultural and food manufacturing business, employing over 2,000 people across Australia and New Zealand. We work closely with Australian growers and a network of local and global suppliers. At Simplot, we are committed to upholding human rights and contributing to a better future. Modern slavery practices, including human trafficking, forced labour, debt bondage, forced marriage, and other abuses of fundamental human rights, are unacceptable.

Through our business activities, we are aware of the potential for modern slavery to exist in our operations and supply chain. While Simplot has not identified any instances of modern slavery, we have taken a rigorous approach to identify areas in our operations and supply chain where the risk may exist. Importantly, through these actions, we have found opportunities to communicate and educate around modern slavery. In doing so, we believe we are taking an important step to raise awareness and ultimately help effect change.

The Simplot company is passionate about a future where good ideas and inspiring possibilities have the chance to grow. We are an organisation grounded in an unwavering commitment to transparency, quality, and mutual respect and are steadfast in our ethical approach to business.

Our passion for cultivating a better future continues to propel us forward and has been a key driver in guiding our approach to addressing this issue. Looking ahead, we will continue to do our part to raise awareness about modern slavery and improve our processes to prevent the potential for its occurrence. We will also work closely with our suppliers to support them in their response to emerging human rights risks.

Global research suggests modern slavery is a growing global and systemic issue affecting an estimated 40.3 million people, with 16 million people in forced labour in the private economy<sup>1</sup>. We believe we can make a significant difference in addressing this global issue through the collective efforts of our team members, suppliers, customers and industry bodies. It is essential to help improve the lives of all in our global community.

<sup>1</sup> The 2017 Global Estimates of Modern Slavery are the result of a collaborative effort between the International Labour Organization (ILO) and the Walk Free Foundation

**COMPANY OVERVIEW**

Simplot 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.

As a business, we pride ourselves on building long-term partnerships with Australian farmers and our supply chain.

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

Simplot directly employs over 2,000 people in Australia and many of these work at one of our six manufacturing facilities. We are also proud to work with over 300 Australian growers who supply 400,000 tonnes of Australian vegetables and potatoes 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 2,450 suppliers, of which 2,258 (92%) are based in Australia. Simplot’s head office is located in Mentone, Victoria, and it is part of the privately-owned J.R. Simplot Company.

ICONIC BRANDS



We have six manufacturing facilities: Flemington and Echuca (VIC), Bathurst and Kelso (NSW), Devonport and Ulverstone (TAS)



300 Australian growers supply 400,000 tonnes of vegetables and potatoes to our operations each year



We directly employ over 2,000 people across Australia and New Zealand



In 2020, Simplot celebrated 25 years of operating in Australia

**OUR STANCE ON MODERN SLAVERY**

Simplot is part of many communities, and maintaining a strong and supportive relationship with all of them is vital to our success. We strive to act responsibly and with integrity and to create value for our team members, customers, suppliers, and all we work with.

As detailed in the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities, modern slavery takes many forms. Through our operations and global supply chain, we recognise that there is the potential for modern slavery to exist. We are committed to upholding human rights across our operations and supply chain and taking the necessary 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 risk, including modern slavery, reside with our Managing Director and Executive Leadership Team, who are supported by our Corporate Social Responsibility Committee and Sustainability Working Group.

**THE DIFFERENT FORMS OF MODERN SLAVERY**

**Trafficking in Persons**

The recruitment, transportation, transfer, harbouring or receipt of persons.

**Slavery**

Where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.

**Servitude**

Where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.

**Forced Marriage**

Where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.

**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.

**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.

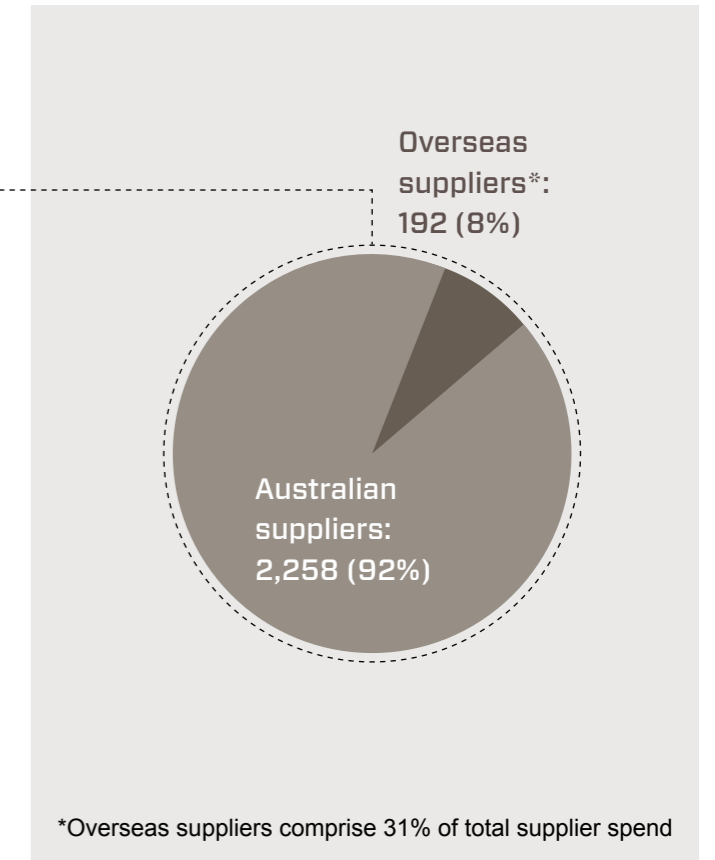
**Source:** Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities

**OUR SUPPLY CHAIN**

Simplot'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 2,450 suppliers in the following categories:



\* Of the 717 ingredient and product suppliers, 103 are overseas, with the remainder based in Australia



Simplot strives to act responsibly and with integrity and to create value for our team members, customers, suppliers, and all we work with.

**IDENTIFYING MODERN SLAVERY RISKS**

Simplot has always been focused on ensuring human rights are upheld. We commissioned KPMG to undertake a supply chain mapping and risk identification review of our top 10 products in 2015. This baseline report has underpinned our modern slavery journey and our focus on higher risk categories, our supplier due diligence process and targeted governance processes.

As part of our annual company-wide risk assessment process, we review our internal company risks and those that may exist within our supply chain.

Within our own operating locations, we assess the risk of modern slavery to be low. This is supported by the majority of our team members

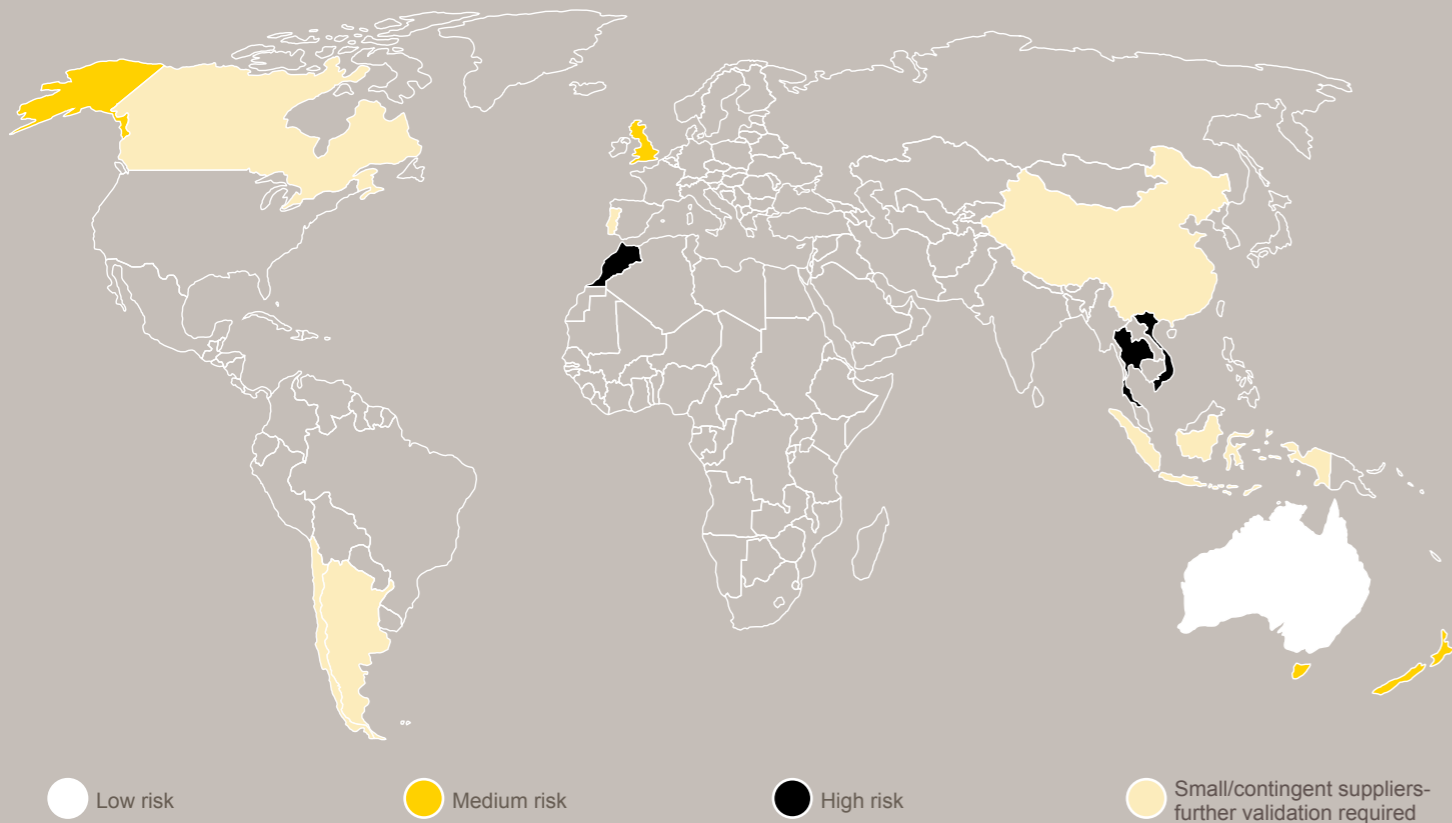
being covered by enterprise agreements. We are also in the process of independently certifying our manufacturing operations. However, we acknowledge the potential for greater risk is in our overseas supply chain and with contracted and third-party labour providers where we currently have a lower level of visibility.

Outside of the defined annual risk assessment process, we monitor and work closely with non-government organisations, such as World Wide Fund For Nature Australia and industry partners and associations, to ensure we remain informed about any emerging human rights issues.

Watch [here](#) to see how this is positively impacting these communities.

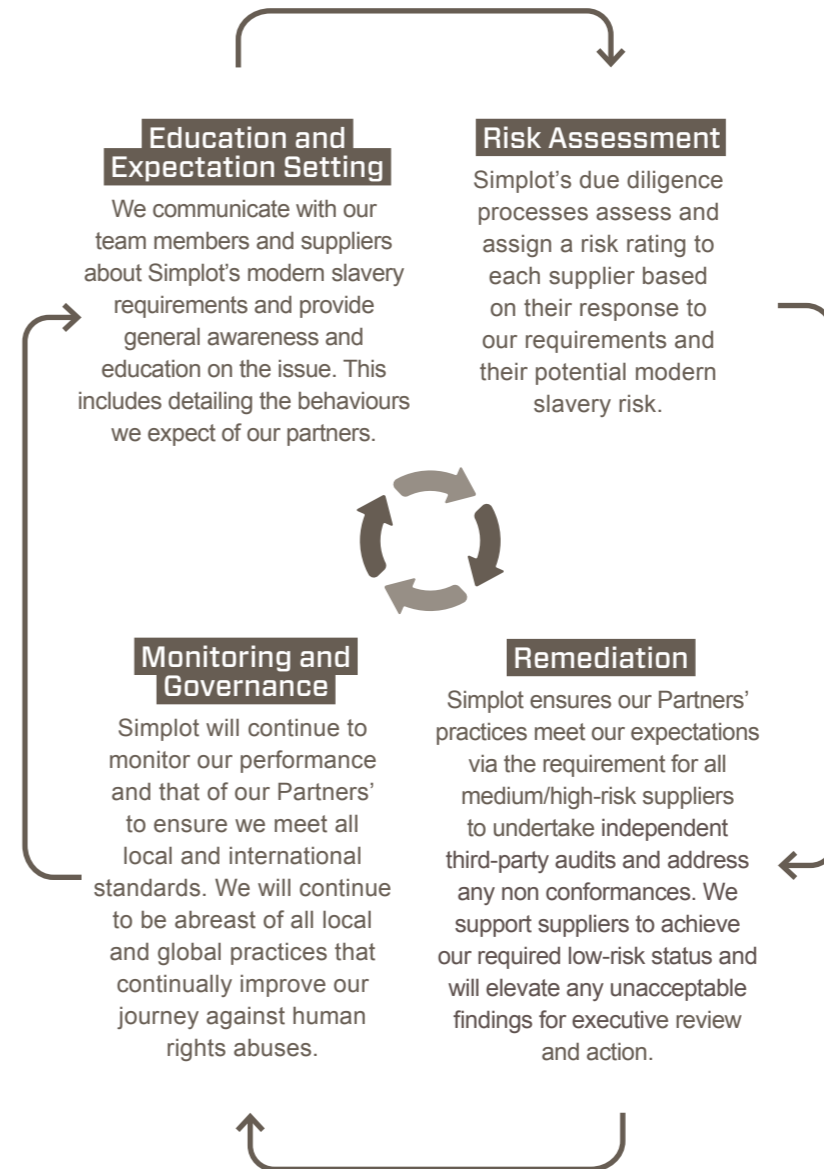
**KPMG SUPPLY CHAIN MAPPING AND RISK IDENTIFICATION**

In 2015, this focused on Simplot's Top 10 core products and assessed items including regulatory environment, supply chain transparency, management practices, business criticality, and elements of modern slavery.



**ENGAGING WITH OUR SUPPLIERS**

Simplot works closely with its suppliers to develop relationships that support mutually beneficial outcomes and strengthen our combined approach to human rights. The core approach to Simplot's modern slavery compliance is underpinned by the following elements:



Simplot has built on the baseline report from 2015 to develop a targeted and prioritised approach to engaging our supplier base.

**OUR COMMUNITY PROGRAMS**  
**Supporting the Most Vulnerable**

Simplot has alliances 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.



We have long-established community partnerships with Foodbank and SecondBite. In 2019, 796,000 meals and 32,000kgs of pasta sauce were donated to Foodbank to help people in need.

Through our Indigenous Communities Program, we support the delivery of critical food and supplies into the remote aboriginal communities of Kabulwarnamyo, Manmoyi and Mamardawerre in west Arnhem Land, an area of global significance for its natural and cultural value.

Simplot is pleased to partner with World Wide Fund For Nature Australia and the Australian Government, through the Australian NGO Cooperation Program to support community-based fishing and microfinancing initiatives in the Solomon Islands Western Province and Madang in Papua New Guinea. The project aims to protect over-exploited reef ecosystems, create food security, boost local economies, and support local women's business opportunities.



Zone 4 Women's Savings Club members prepare for the parade in Ghizo, Solomon Islands



**MITIGATING RISK AND ADDRESSING MODERN SLAVERY**

Policies, contracts, monitoring activities, regular communication and engagement with our team members and partners are the key controls we have established to manage potential or actual risks of modern slavery in our operations and supply chain.

We have a comprehensive set of policies, standards, and practices that outline our values and ways of working. Simplot outlines the standards and principles that we expect our customers, contractors, suppliers and their sub-tier suppliers (**“Partners”**) to adhere to when conducting their business and business with us. As applicable to our Partners, the standards and principles from the global J.R. Simplot Code of Conduct have been incorporated into [Simplot’s Partner Code of Conduct](#).

We expect our Partners to use their best endeavours to ensure that they do not engage in modern slavery.

We expect our Partners to use their best endeavours to ensure that they do not engage in modern slavery. Simplot will not knowingly conduct business with Partners who violate laws relating to employment, the environment or safety, or engage in any other unethical employment practice.

We aim to ensure our team members and Partners understand our expectations and know how to raise a grievance or complaint should these policies, standards or practices not be followed.

The following references are deemed most relevant to preventing modern slavery in our operations and supply chain:

INTERNAL

<p> <b>J.R. SIMPLOT CODE OF CONDUCT</b> Defines the global behavioural expectations we have of our team members with respect to colleagues, suppliers, customers and members of the community.</p> <p> <b>PROCUREMENT POLICY</b> Outlines the process for procuring goods and services and requires activities to be conducted in an honest, competitive, fair and transparent manner.</p> <p> <b>ENTERPRISE AGREEMENTS</b> Simplot has enterprise agreements in place across our operations, which cover a significant portion of our workforce.</p>	<p> <b>WHISTLEBLOWER POLICY</b> Provides a framework and encourages the reporting of instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Simplot.</p> <p> <b>EMPLOYEE REPORTING HOTLINE</b> An independent service that provides employees with a confidential place to voice concerns or raise issues.</p> <p> <b>SITE AUDITS</b> Our sites are subject to periodic internal, and customer audits in line with our contractual obligations.</p>
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EXTERNAL

<p> <b>SUPPLIER PRE-QUALIFICATION</b> Simplot requires suppliers to meet a set of predetermined standards in order to do business with us.</p> <p> <b>PARTNER CODE OF CONDUCT</b> Simplot expects Partners to adhere to all applicable laws and regulations and to use their best endeavours to comply with the principles of our Partner Code of Conduct (pre-qualification requirement).</p> <p> <b>SEDEX MEMBERSHIP AND AUDITS</b> Simplot accepts Sedex ‘B’ membership or equivalent risk assessments. Suppliers deemed medium or high-risk may be required to undertake a third-party ethical audit.</p>	<p> <b>SUPPLIER CONTRACTS</b> Simplot requires modern slavery compliance in its supplier contracts.</p> <p> <b>SUPPLIER AUDIT PROGRAM</b> Simplot’s Quality team manages a vendor assurance program that includes a supplier audit schedule based on key risk criteria. These risks are assessed continuously with audit frequency adjusted as required.</p>
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**OUR APPROACH**

We have taken a two-staged approach for assessing modern slavery risks in our supply chain.

**Stage One** – This involves communicating with our suppliers about Simplot’s modern slavery requirements and providing general awareness and education about the issue. Our specific requirements of suppliers include the need for them to sign our Partner Code of Conduct and complete a Sedex or equivalent risk assessment.

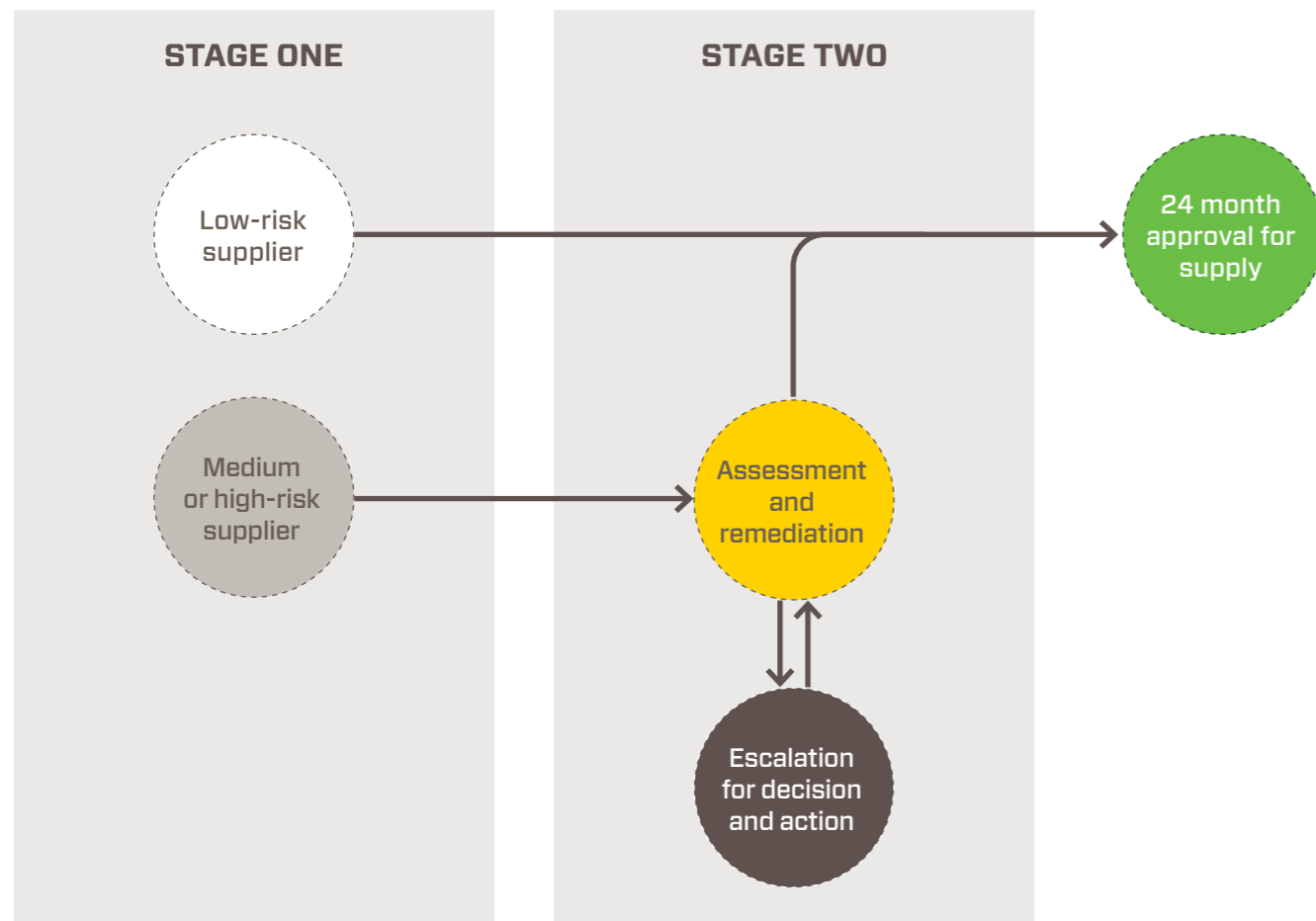
**Stage Two** – Once suppliers have completed Stage One requirements, their inputs are reviewed to determine the level of risk presented by the supplier. Low-risk suppliers are approved to supply Simplot for 24 months before they must again complete Stage One requirements.

Medium or high risk suppliers must undertake an independent third-party audit and subsequent remediation of any identified non-conformances. Any instances of modern slavery or any unacceptable non-conformances will be escalated for executive review.

**ASSESSING OUR EFFECTIVENESS IN ADDRESSING MODERN SLAVERY**

Our engagement with, and assessment of our Partners has resulted in substantial progress in our efforts to identify and mitigate the risk of modern slavery. To date, no instances of modern slavery have been identified in our supply chain.

Simplot continues to monitor the effectiveness of our approach via a balanced scorecard that will evolve as we progress into our Stage Two activities.



**Note:** Sedex is one of the world’s leading ethical trade membership organisation, working with businesses to improve working conditions in global supply chains. SMETA (Sedex Members Ethical Trade Audit) is Sedex’s social auditing methodology, enabling businesses to assess their sites and suppliers to understand working conditions in their supply chain.

**CASE STUDY**

**COVID-19 and its impacts**

As well as ensuring our customers’ shelves were stocked, we stayed committed to supporting our charitable partners and their critical work.

The pandemic has presented several human rights challenges, particularly those related to socio-economic and livelihood impacts. Like many companies, Simplot 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 two key priorities:

1. Keeping our people safe and healthy.
2. Ensuring our operations’ continuity so that we can provide essential food that our communities rely upon.

The community’s initial ‘panic buying’ response to COVID-19 led to an exponential increase in order volumes. Many of our teams, including commercial, procurement, logistics, planning, customer service, and those working at our operations, were committed to ensuring we could meet this demand and keep the community stocked in the essential food items they know and trust. Simplot prides itself on having longstanding partnerships with our supplier base, and we worked closely with them to help us meet this demand.

Like us, our suppliers and extended supply chain, have dealt with additional complexity and strain across their operations and faced a need to reprioritise work efforts to focus on the most immediate issues. Many suppliers are based in countries where government support has been limited, and restrictions due to COVID have significantly impacted their operations and livelihoods.

Our company purpose to “Contribute to Feeding our World” has been pivotal and helped us remain focused during these extraordinary times. As well as ensuring our customers’ shelves were stocked, we stayed committed to supporting our charitable partners and their critical work. This has included providing support to Foodbank, which reported a significant increase in demand due to the pandemic.

To support our team members who have had to be adaptable and adjust to new ways of working, we have instituted mental health and well-being programs. As an organisation, we also implemented Special COVID Paid Leave to act as a ‘safety net’ for team members directly affected by COVID-19.

As a result of COVID, many suppliers primarily focussed on ensuring the continuity of their own operations in these uncertain times. In the year ahead, we look forward to engaging with our suppliers to identify ways to support them further and progressing our work on modern slavery.



### SIMPLOT'S PROGRESS AND FUTURE AREAS OF FOCUS

Simplot has made substantial progress in our first year of reporting through various internal and external actions. Our team members and Partners have received education regarding the modern slavery legislation and have been informed of their obligations.

We have segmented our suppliers which has determined the method and prioritisation for our approach. We have contacted 604 of our 2,450 suppliers. Given our prioritised focus on significant and potentially high-risk suppliers, this represents 73% of our total supplier spend. We determined 469 of these suppliers as having a low-risk status while 135 are under review.

The progress achieved with our supplier base is summarised below.



\* 220 of the 469 suppliers who have completed the Stage One process are suppliers of ingredients and products

As we continue to build on our activities, we will focus on the following actions in the next 12 months.

<p>Stage One - continue our prioritised approach for remaining suppliers</p>	<p>Stage Two - ethical audit program commencement</p>
<p>Sedex SMETA 4 accreditation for our manufacturing facilities</p>	<p>Robust contracts to ensure modern slavery compliance</p>
<p>Ongoing team member training</p>	<p>Develop and roll out risk assessment process for our agricultural growers</p>
<p>Education and ongoing compliance with recruiters of contingent labour</p>	<p>Focus on any elevated risks arising from COVID-19 pandemic</p>

Simplot will continue to work closely with our team members and Partners to further understand the potential risks of modern slavery in our supply chain. To this end, we are committed to further embedding our policies, standards, and practices across our business.

Through these actions, we believe we are helping to raise awareness of modern slavery and the actions required to effect change.

- RESOURCES AND REFERENCES:**
- Australian Modern Slavery Act 2018 (Cth.)
  - Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities
  - UN Guiding Principles on Business and Human Rights
  - OECD Due Diligence Guidance for Responsible Business Conduct
  - 2018 Global Slavery Index

