

Corval Group  
150 Newlands Road,  
Coburg North VIC 3058

Head Office/VIC Office  
Phone: 03 9487 9500



**CORVAL GROUP**  
Modern Slavery Statement  
2021

# 1.Introduction

**Corval Group Pty Ltd as Trustee for the Corval No.2 Trust, is a 100% Australian privately owned business and head entity of multiple businesses operating primarily in the food and beverage, and logistics industry. As a family business, people are our family and we take great pride in building genuine relationships that last a lifetime, be it with our suppliers, customers, partners or employees.**

Whilst we consider that every part of our business has always been guided first and foremost by family values, integrity, and ethical principles, Corval Group acknowledges that there is always a risk that we may have unknowingly and unwillingly contributed to modern slavery through our supply chains.

'Modern Slavery' is a term used to describe a range of various forms of exploitation or deceptive recruiting for labour or services where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception. These situations include slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour and the worst forms of child labour. Modern Slavery is fundamentally unacceptable within our business and supply chains. We resolutely support the *UN Guiding Principles on Business and Human Rights* and actively accept the responsibility we have in eliminating any form of violation within our operations and those of our supply partners.

# 2.Reporting Entity

**Corval Group Pty Ltd, ATF Corval No.2 Trust, (ABN 63 341 137 300) ("Corval Group")**

**Reporting Period: 1 July 2020 to 30 June 2021**

This Modern Slavery Statement is prepared and issued by Corval Group and is made pursuant to the Modern Slavery Act 2018 (Cth) ("the Act") in respect of Corval Group and its controlled entities<sup>1</sup>. This Statement reports the steps taken by Corval Group during the financial year ending 30 June 2021 to combat modern slavery in its operations and supply chain.

Corval Group's head office is located in Melbourne, Victoria. Its key operation is as a holding company of its owned operational businesses and as a central professional service provider (such as strategy, finance, IT and legal) to those related entities.

As the operations of the above-mentioned operational businesses fall under the same senior management, the same board composition, policies and processes, Corval Group adopts the same human rights and other ethical due diligence processes across the entities.

<sup>1</sup>For the purposes of the *Modern Slavery Act 2018 (Cth)*, entities that are intended to be covered by this Corval Group Statement include: Corval Group Pty Ltd, ATF Corval No.2 Trust; The Trustee for THE CONGA TRUST (trading as Conga Foods Pty Ltd), (Conga Foods Pty Ltd); Caffè Ducale Pty Ltd (trading as dc Specialty Coffee Roasters); Pakval Pty Ltd; Gourmet Secrets Pty Ltd.

# 3. Corval Group Operations & Supply Chains

**Corval Group is the controlling entity of trading businesses: Conga Foods Pty Ltd ([www.congafoods.com.au](http://www.congafoods.com.au)), dc Specialty Coffee Roasters ([www.dccoffee.com.au](http://www.dccoffee.com.au)), Pakval Warehouse Solutions ([www.pakval.com.au](http://www.pakval.com.au)), and Gourmet Secrets, which operate primarily in the field of food and beverage, and 3rd party logistics.**



Established over 60 years ago, Conga Foods Pty Ltd's (Conga Foods) main operations include the sourcing, importing, marketing, selling (nationally and exporting) and distributing of quality Mediterranean-style foods in Australia. The company operates warehouses and offices in VIC, NSW, SA, QLD and WA, and employs approximately 120 staff as well as engaging contractors for approximately 40 additional roles.

Conga Foods supply chain include the importation of foodstuffs from various long-term suppliers and manufacturers based in Europe and South-East Asia and the subsequent warehousing, distribution and sale of the products to its customers, including Australia's major supermarket chains and department stores, large format and small Independent stores, continental grocery stores and major national wholesalers, key state wholesalers and occasionally international wholesalers.



dc Specialty Coffee Roasters (DC Coffee) supply chain include the sourcing of quality green coffee beans from Australian coffee bean wholesalers. Beans are procured from various places in South America, Africa and Asia, roasted here in Australia and supplied nationally to foodservice customers, wholesalers, independent stores and major supermarket chains. It is a core focus of DC Coffee to connect with farmers wherever possible (even where beans are ultimately purchased via Australian wholesalers) and to only source beans that have been sustainably and ethically produced.

DC Coffee also procures a number of accessories and equipment for the service of its foodservice customers such as coffee machines and coffee grinders, merchandise, crockery, takeaway cups, as well as complimentary consumable products, such as tea, chocolate and sugar.



Pakval Warehouse Solutions (Pakval) is a 3PL provider specialising in the warehousing and transport of groceries and other consumer products for third parties. Pakval has warehouses in Melbourne, Sydney, Brisbane and Adelaide and also offers ancillary related services. Its main supply chain includes local transportation and logistic providers and suppliers of warehouse equipment and products.

## GOURMET SECRETS

Gourmet Secrets is a small business whose core activity is the management of the DC Coffee online store (<https://dccoffee.com.au/collections/all>) and the supply of coffee carts and respective operational staff to selected stores of DC Coffee customers, where coffee beverages are sold to in-store shoppers.

**Whilst the three main operational entities of Corval Group have different foci, as articulated above, their supply chains also all include other services that contribute to their operations, such as:**

- the provision of third-party storage facilities and logistics solution providers (including international freight forwarders and local transport companies) for receipt and delivery of products;
- the waste management, cleaning and security companies that service physical offices and warehouses;
- the supply of warehouse equipment (forklifts, safety equipment and packaging materials) and office equipment and supplies (such as computers, digital devices, furniture, stationary); and
- the supply of professional services (such as accounting, legal, IT and marketing & media services).

# 4. Identifying Modern Slavery Risks Operations & Supply Chains

Corval Group's human rights due diligence is multi-tiered and encompasses a number of processes and procedures. Within its own operations, Corval Group has various policies, guidelines and codes of conducts which sets out expected behaviours and rights and the company provides training therein (both internally and externally conducted) for Directors, Officers and Employees to ensure human right breaches can be identified and therefore acted upon.

## Our Human Rights - Framework

### CORVAL GROUP

(CONGA FOODS / DC COFFEE/ PAKVAL)

BOARD OF DIRECTORS

Establishes Strategic Objectives; Approves policies; Approves key objectives & KPIs; Reviews Performance

EXECUTIVE TEAM  
SENIOR LEADERSHIP TEAM

#### OUR PEOPLE

RESPONSIBILITY:  
PEOPLE & CULTURE

Recruitment Policy

Employee Induction

Employee Code of Conduct & Policies  
(eg. Equal Opportunity and Prevention of Harassment, Discrimination and Bullying Policy/ Wellbeing Leave Policy)

Health & Safety

Employee Support programs  
(eg. Assure/Resilience Project)

Internal Feedback via regular  
'Pulse-Checks'

#### OUR ENVIRONMENT

RESPONSIBILITY: PROCUREMENT  
& BRAND MANAGERS

Product Sustainability  
(eg. Cage free eggs Commitment/Sustainable Sourcing/Packaging Waste Reduction/Sole Mare Sustainability Policy)

Sustainability Commitments  
(eg. Carbon Footprint Reduction)

#### OUR COMMUNITIES

RESPONSIBILITY:  
PHILANTHROPY COMMITTEE

Feed Appeal Partnership

GIMA Partnership

Product Donation  
to various charities

#### OUR COMPANY

RESPONSIBILITY: RISK &  
COMPLIANCE COMMITTEE

Contract Management

Audits

Provide review & oversight

#### OUR PRODUCTS

RESPONSIBILITY: PROCUREMENT  
& BRAND MANAGERS

Procurement Risk Assessment

Product Quality & Safety Program

Ethical Sourcing Program

Ethical Trading Standards

Supplier Education

Supplier Audit Program  
(eg: SAQ/Declarations)

THIRD PARTY AUDITS AND CONSULTATIONS

ETHICAL  
TRADE  
WORKING  
GROUP

REMEDICATION, REPORTING  
& CONTINUOUS IMPROVEMENT

EDUCATION

ANTI-SLAVERY POLICY & WHISTLEBLOWER POLICY

**By virtue of the industry type in which we operate and our operational base in Australia, we believe the risk of modern slavery in our directly employed workforce is very low. The Australian labour market is heavily regulated and our rule of law is among the most effective globally.**

**Corval Group and its related entities insists that all employment within our entities is voluntary and Corval Group holds as a key priority the health, safety, security and wellbeing of all of our employees. Corval Group strives to create a work environment which is inclusive of all people, regardless of gender, age, race, disability, sexual orientation, cultural background, religion, family responsibilities or other areas of potential difference.**

Following our assessment of our operations and supply chains, we consider that the Corval Group is at greater risk of contributing to or being directly linked with an incident of modern slavery through our supply chains, rather than directly causing an incident within our own operations.

We recognise that the due diligence of all suppliers in our supply chain is important to ensure we do business with suppliers who share our core values, our targets for sustainable and fair business practices and are committed to the same social, ethical and moral obligations and high quality standards to which we hold ourselves. We also recognise that the due diligence is challenging where supply chain spans multi-borders, is multi-tiered and complex, as it is in the instance of Conga Foods.

Corval Group recognises that its different operational entities have varying degrees and differing types of modern slavery risks inherent in their respective operations and supply chains. For clarity, we undertake a separate analysis for each operational business. Whilst in 2020 our focus was on our largest operational entity, Conga Foods, we have expanded our modern slavery risk analysis in this reporting period to DC Coffee.

Our initial scoping exercise<sup>2</sup> for both Conga Foods and DC Coffee included mapping our supply chain, assessing the potential risk of modern slavery by reviewing country and industry risk indicators provided by expert organisations such as the Ethical Trade Initiative (ETI) and considering how we may cause, contribute or be directly linked to modern slavery.

<sup>2</sup>We relied on a wide variety of resources to conduct our analysis, including but not limited to *Global Slavery Index*, *Walk Free Foundation*, *Anti-Slavery Australia*, *Anti Slavery Organisation*, *OECD Due Diligence Guidance for Responsible Business Conduct*, *Business & Human Rights Resource Centre*, *KPMG Guide "Modern Slavery Risks, Rights & Responsibilities"*, *International Labour Organisation*, *Know the Chain Food & Beverage Report*, *Department of Home Affairs*.

# Conga Foods

**As a food importer and distributor, the procurement of food products from overseas accounts for over 80% of Conga Foods supply chain expenditure.**

Conga Foods works with approximately 100 Tier 1 suppliers and enjoys long-term and mutually beneficial relationships with them, reflected in the lengthy duration of our trading relationships. Over 20% of our suppliers have been trading with Conga Foods for over 20 years and we have an average trading relationship of 14 years across all tier 1 suppliers.

Most significant products sourced by Conga Foods	Main Source Countries
<b>FOOD PRODUCTS</b>	
Agricultural (such as Olive, Tomato, Vegetable Products)	Australia, Greece, Italy, Spain, Turkey
Vinegar	Australia, Italy
Small Goods	Australia, Italy, Spain
Seafood	Italy, Latvia, Portugal, Spain, Thailand
Dairy (Cheese)	Australia, Austria, Belgium, Italy, Germany, Netherlands, Portugal, Spain, Switzerland
Grains (such as Pasta, Rice, Flours)	Italy
Legumes	Italy
Other (such as Cakes, Molasses, Preserves, Ready Meals)	Australia, Belgium, Italy, United States of America
<b>NON-FOOD PRODUCTS</b>	
Packaging	Australia, China
Coffee Machines	Italy

**Via the identification of modern slavery risk process outlined above, we understand that the some of our overseas suppliers operate in a high risk sector (such as agriculture and fish) and/or, in few cases, high risk geographical location (due to local governance issues, impact of conflict, inequality and lack of basic social needs).**

Over 85% of our food products are procured from Tier 1 suppliers based in Europe, where countries have stable economical, socio-cultural and political systems, where the prevalence of modern slavery is low and where the rule of law and government responses to modern slavery is strong. We consider that there is a low to medium potential for risk of modern slavery incidences within those supply chains.

We assess that our highest risks are in the sourcing of tuna from Thailand, in that modern slavery and unethical practices are known to be prevalent in the fishing industry and Thailand as a country generally. To mitigate those risks, Conga Foods ensures all of its tuna is sourced from suppliers who are members of the Supplier Ethical Data Exchange (SEDEX), a world leading not for profit organization dedicated to drive improvements in working conditions and responsible, sustainable ethical business practices in global supply chains.

Each can of tuna is printed with the specific fishing zone and our auditing system allows us to track any can of tuna down to the individual fishing vessel, fishing zone and period of catch.

Further, Conga Foods undertakes an annual audit of Thai suppliers of seafood via completion of a self-assessed questionnaire together with the provision of supporting documentation (such as valid, up-to-date policies and third-party audits) and in-person, on-site visits.



# DC Coffee

**DC Coffee's roasted coffee products account for 95% of total sales to customers. It follows that the highest risk identified in DC Coffee's operations is the purchase of raw product, specifically green coffee beans – not only for the sales value and the amount of supply chain expenditure they represent (approximately 46% of costs of goods sold) but also due to their country of origin and in that most coffee farmers are Tier 2 suppliers in our supply chain.**

Whilst DC Coffee chooses to procure green coffee beans from select farms located in Brazil, Colombia, Ethiopia, Nicaragua, Guatemala, India, Sumatra and Tanzania, the purchases are ultimately made via a network of coffee bean wholesalers located in Australia.

It is reported that a number of those countries (particularly Brazil, which accounts for more than a third of the world's supply), despite recent efforts to 'clean up' the coffee sector, continue to have high frequency of forced labour incidents, particularly child labour and that modern slavery incidences (particularly debt bondage, unsatisfactory pay, undocumented work, little to no rights or benefits and poor safety measures) remain pervasive in the coffee trade.

**CORVAL GROUP**

## 5. OUR ACTIONS

### **ETHICAL TRADE WORKING GROUP**

**Corval Group created an Ethical Trade Working Group, made up of various stakeholder group representatives such as a Director and senior leaders of Corval Group and representatives from People & Culture, Quality Assurance, Procurement and Legal across the three key operational businesses of the Corval Group (Conga Foods, DC Coffee and Pakval).**

The Ethical Trade Working Group's role is to continuously review, reassess and further develop the Corval Group's modern slavery action program to ensure any modern slavery risks in our operations and supply chain are identified, addressed and remediated with the eventual elimination of any modern slavery risk. Members of the Working Group also hold key responsibilities in furthering Corval Group's commitments to other ethical and sustainable practices more generally.

A nominated representative from this Working Group provides regular updates to the Senior Leadership Team, which also includes common Directors of the Board of Corval Group and its controlled entities.



## **CONTINUOUS IMPROVEMENTS IN OUR EXISTING FRAMEWORK, POLICIES & PROCESSES**

We continuously review and update various key policies that underpin our commitment to responsible business, including:

**Ethical Trading Standards:** which specifies the minimum standards of behaviour that we require our suppliers to meet in the areas of modern slavery, labour and human rights, legal compliance, animal welfare, environment protection, and business ethics throughout their operations and supply chains.

**Anti-Slavery Policy:** which applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants, suppliers and any other third-party representatives and their associated operations.

**Grievance & Complaint (Whistle-blower) Policy:** which allows employees (of any term or type), associates, suppliers (including their employees, contractors, consultants, service providers and business partners), consultants, or a relative, dependant or spouse of any of the above individuals, to report a suspected concern regarding human rights (or other such grievances).

## **RESPONSIBLE SOURCING PROGRAM**

Our Responsible Sourcing Program outlines the business and supplier expectations for compliance and is framed by our key policies (noted above) but also details how we implement these policy commitments. The program further details how we categorise supplier risk, the frequency and level of our audit program at which suppliers are to be audited and what must happen where non-conformity are found in audits. We further detail which mutual recognition schemes we accept, given many of our suppliers have third-party accreditations.

## **SUPPLIER AUDIT PROGRAM**

All suppliers are subject to our Supplier Audit Program, which is driven by various components including a Self-Assessment Questionnaire, Declarations, Third-Party Audits and Third-Party documentation.

## **RAISE AWARENESS OF MODERN SLAVERY WITH STAKEHOLDERS AND ENSURE INCLUSION IN CONTRACTUAL ARRANGEMENTS**

Corval Group continues to include clauses in any new contractual arrangements that specifically prohibit modern slavery. We continuously take the opportunity, wherever possible, to educate the other contracting parties around the existence of modern slavery, our requirements under the Act and ensure that they also share these commitments to ethical behaviour in order to transact with us.

## **EDUCATION & TRAINING**

Corval Group has developed a training module for internal employee training and also offers third party educational courses to various employees, which is expanded each year. Various members of the Ethical Trade Working Group also participate in various forums, presentations and training regarding modern slavery, human rights and sustainability.

As some of our suppliers operate in different legal and cultural environments throughout the world, beyond general awareness and obligatory participation in our Supplier Audit Program and acceptance of our policies, Corval Group aims to educate our suppliers wherever possible. We aim to develop some more specific resources in order to better support this objective, particularly given some cultural and linguistic obstacles.

# Conga Foods

## **SUPPLIER RISK MANAGEMENT**

**In terms of our imported products, ensuring that the agricultural raw materials for our products and procurement of seafood products are responsibly produced is a challenge given that we may not always have direct contact with the farmers or the secondary-tier suppliers themselves.**

Following the initial phase of our ethical trading audit program which began in financial year 2020 and to ensure we addressed our resources towards the most effective range of impact possible, we continued to focus our activities during this reporting period on the primary food product sourcing of Conga Foods.

Specifically:

## **2021 AUDIT PROGRAM**

Following the year 2020, where over 60% of our total food product suppliers underwent our audit program, the remainder of our tier 1 food product suppliers were audited.

## **SUPPLIER RELATIONSHIPS**

We only have relationships with reputable suppliers who we believe conduct their businesses responsibly and who agree to be bound by the terms of our *Ethical Trading Standards* and *Anti-Slavery Policy*.

We maintain close and long-standing relationships with our suppliers, choosing to collaborate over lengthy periods of time, rather than engage in short-term, ad-hoc or 'one-off' sourcing contracts. This allows us to develop a deep level of trust and understanding of our suppliers' businesses, their owners and key management and allows us to have confidence in the efficacy of their programs and policies and in their accuracy of any self-assessments we may require them to complete.

Conga Foods does not set unrealistic cost targets and/or delivery timeframes that could only be achieved through worker exploitation.

Where possible, we conduct on-site visits of our suppliers' offices and factories, often having the chance to connect with various levels of employees, beyond the supplier's Executive team.

## **SUPPORTING LOCAL COMMUNITIES**

Conga Foods acknowledges that there remains an unacceptably high level of hunger among many vulnerable Australians.

In 2021, Conga Foods continued to support a number of food charities via much needed product donations, particularly after the sharp increased demand for food relief across the country after the devastation caused by the recent wave of natural disasters and the impact of the COVID19 pandemic. Via Squeaky Gate, our Australian olive oil brand, Conga Foods continues its multi-year commitment to Feed Appeal as the Principal Partner of their Rural Grants Series.

Through our commitments with Feed Appeal, we assist to generate awareness, community engagement and much needed funding for rural areas of Australia where food insecurity is particularly high.



# DC Coffee

## **OUR SUPPLY CHAIN**

We undertook an initial scoping exercise (as noted in section 4 of this Statement) of DC Coffee operations and supply chain.

Via this process, we identified that we carry a high-risk of inadvertently contributing to modern slavery via our green coffee bean suppliers who operate in both a high risk sector as well as a high risk geographical location (due to issues such as poor local governance, impact of conflict, inequality and lack of basic social needs).

To some extent, our modern slavery risk is mitigated where we are able to purchase beans from existing, recognised certifications (Fair Trade), however we are aware of reported incidences of coffee being produced by forced labour that has been stamped slavery-free by top certification schemes, so we are conscious that it is insufficient to rely on such certifications alone.

Regardless of the certification status, we recognise more work needs to be undertaken in our supply of green beans and that we need to continue to delve deeper and carry out more detailed investigations within our secondary tier suppliers.

We prioritise working with suppliers who consider social responsibility and sustainability as fundamental aspects their coffee business and where they implement their own ethical sourcing programs. We place reliance and trust in our green bean wholesalers (effectively our Tier 1 suppliers) who have direct relationships and frequent communications with the coffee farmers themselves.

During this reporting period, all of our green bean wholesalers took part in our audit program, along with a significant portion of our other suppliers (including other consumable products (such as tea and milk), packaging and ancillary products (such as takeaway cups and crockery) as well as services such as coffee equipment servicing and transport & logistics.

## **SUPPORTING COFFEE FARM COMMUNITIES**

While producing trusted premium coffee for Australian consumers is our specialty, helping communities in coffee bean-growing regions in order to create a reliable, sustainable industry is at the core of our business.

During the reporting period we helped fund a new coffee washing station in Tanzania to further local economic development; we donated to a local community hospital in Brazil and donated funds to local coffee farming communities in Guatemala to assist in their efforts to receive food, water, shelter and to re-seed their coffee plantations after the devastation Hurricanes Eta and Iota caused in late 2020.

## **EDUCATION OF CHILDREN OF COFFEE FARM EMPLOYEES**

We believe that education is a fundamental component to ensuring equality and sustainability and therefore preference purchasing a large amount of coffee beans from coffee farms that provide a school on site to ensure children of coffee farm employees attend school and obtain education <sup>3</sup>.

We further support children's education via our partnership with GIMA, whereby money we donate is used to purchase digital devices so that primary school children can continue to access basic core education, notwithstanding the temporary (but ongoing) closure of their schools due to the COVID-19 pandemic.

<sup>3</sup> There are reports (although to our knowledge none relating to the farms from where we source green coffee beans) frequently where parents remove their children from school to work on the coffee plantations when coffee prices are high and in doing so, children miss out on the basic right to be educated.

# REMEDIATION PROCESSES

**In the unfortunate event Corval Group suspects the occurrence of modern slavery within our supply chain, we are prepared to work with urgency and immediately carry out or enforce corrective measures.**

We will engage with the supplier and seek constructive dialogue and remediation of the incident and set clear KPIs to monitor the effectiveness of the steps taken to ensure that no further modern slavery incidences occur.

Where any gross violation of human rights is identified, including modern slavery incidences, Corval Group may immediately initiate action to remove the supplier from the supply chain temporarily and/or cease business dealings entirely.

Where a suspected incident has occurred within our own direct operations, any employee involved may face disciplinary action and/or dismissal.

In all instances, Corval Group may also report the incident and the offending party to the relevant authorities.

## 6. EVALUATING THE EFFICACY OF OUR ACTIONS

**During the reporting period, we did not identify any incidences of modern slavery nor any risks requiring additional remediation steps beyond the risk assessment and audit program described in Section 4 of this Statement.**

However, our conversations continue with select suppliers who we believe can further their policies and processes to specifically address modern slavery concerns. Whilst many of our larger suppliers already report on human right matters, a minor number of our smaller suppliers have not necessarily appreciated the prevalence of modern slavery incidences in supply chains. Some suppliers do not initially understand our desire to address this with them and we believe that via the implementation of our audit program, we are raising awareness and understanding.

By encouraging our suppliers to offer greater education and training for their staff, or implement policies specific to modern slavery where required within their operations, or indeed implement audit requirements upon their own respective suppliers, we believe that there stems a follow-on effect throughout the supply chain from our direct actions.

# 7. OTHER RELEVANT INFORMATION

## **IMPACT OF COVID-19**

**Whilst the initial impact of COVID19 felt in 2020 has subsided, with the processes implemented to ensure the highest level of safety, health and well-being of all of our staff, customers and suppliers continuing as a 'business as normal' measure, the reality of the pandemic continues to affect us and our efforts committed under the Act. Of particular note:**

Due to the restrictions on travel as set by the relevant governments, we have been limited in conducting on-site visits of our suppliers, although regular communications via phone, email and video conferencing have continued. We are conscious that on-site visits of suppliers, particularly of green coffee bean suppliers within DC Coffee operations, are a crucial part of our audit program and we look forward to resuming once travel is again possible.

Corval Group has continued to issue frequent communications and education notices, together with details of available programs and support to staff in order to improve their well-being. The company-wide etc ". The company-wide emotional and mental program continued into the reporting period of 2021 (including The Assure Employee Assistance Program and The Resilience Project sessions with Hugh Van Cuylenburg), with the company supporting the choice of employees to work from home where practical. Corval Group continues to undertake anonymously conducted employee pulse-checks, to ensure employees are feeling connected and supported by Corval Group during these challenging times.

DC Coffee, in particular, continues to feel the ongoing and frequent impacts of government restrictions as a result of COVID-19 pandemic via their foodservice customers and we continue to support them with extended payment terms and discounted invoices.

# 8. FUTURE DEVELOPMENTS

**We also acknowledge that modern slavery is not just a problem unique to product-based industries but rather it is also pervasive in service industries.**

In future reporting periods, we will focus on expanding our auditing program to non-food product procurement (such as packaging materials, marketing merchandise, office furniture and hardware (including electronic devices)) and warehouse equipment and service suppliers (such as logistic providers, office contract cleaning, and ancillary support services such as legal, finance and IT), so as to ensure that all suppliers and service providers uphold our same ethical standards, values and product quality.

## **Further and specifically for all operational businesses:**

We are cognisant of the fact that modern slavery is a complex area with problems often hidden from our view in secondary tier supply levels. We will continue to work closely with our suppliers to delve deeper into areas of any concern and/or where the supply chain is multi-tiered and we do not have immediate view of secondary tier suppliers, to ensure we achieve continuous improvement in our approach, transparency and influence on our supply chain.

Where we have identified in our current and previous audit programs potential gaps in understanding of modern slavery by some of our smaller suppliers, we will continue to support them and work collaboratively to further raise awareness and educate them.

## **CONGA FOODS**

We will look to undertake the SEDEX audit for our largest operation entity, Conga Foods, to independently verify the relevance and effectiveness of our existing policies and processes in our own operations and identify any gaps in our responsible sourcing through our supply chain.

## **PAKVAL**

We will undertake a more detailed analysis and reporting thereof of Pakval operations.

# 9.APPROVAL

## **PRINIPAL GOVERNING BODY APPROVAL**

**This statement has been made on behalf of Corval Group Pty Ltd, as trustee for the Corval No.2 Trust, the Modern Slavery Statement reporting entity, and several other entities that it owns and controls. All entities adhere to the common set of governance policies and programs. A process of consultation across Corval Group and its reporting entities helped to guide the drafting of this statement. This included engagement with the Executive leadership team, the General Managers of each of the reporting entities and the People and Culture team.**

This Modern Slavery Statement was approved by the Board of Directors of Corval Group in their capacity as principal governing body of Corval Group Pty Ltd, ATF Corval No.2 Trust, as defined by the Act on 16 September 2021.

## **SIGNATURE OF RESPONSIBLE MEMBER**

This Modern Slavery Statement was signed by a responsible member of the Board of the Directors of the Corval Group Pty Ltd, ATF Corval No.2 Trust, as defined by the Section 4 of the Act.



**David Valmorbida**  
*Executive Chairman*

Corval Group Pty Ltd, ATF Corval No.2 Trust

# 10. MEETING REQUIREMENTS OF THE ACT

The following table outlines how Corval Group has met the requirements of the section 13 of the Act.

Modern Slavery Act mandatory reporting criteria	Covered in	Page
Identify the reporting entity.	Section 2	1
Describe the reporting entity's structure, operations and supply chains.	Section 3	2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Section 4	3
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks.	Section 5	7
Describe the reporting entity's remediation processes and how the reporting entity assesses the effectiveness of these actions.	Section 6	11
Any other information that the reporting entity, or the entity giving the statement, considers relevant	Section 7	12
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	Section 5 & Section 9	7 & 13

