

# Lite n' Easy

A healthier n' happier Australia



## Modern Slavery Act Statement 2024

A JOINT STATEMENT FOR THE LITE N' EASY GROUP

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**Registered Address:**

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(07) 3267 9292 | Liteneasy.com.au

# Our Vision

A healthier n' happier Australia

# Our Mission

Bringing great people together to deliver innovative food solutions that help Australians live better every day

Lite n' Easy excels when each of us comes to work to perform at our best. When we perform at our best together, we achieve success. This applies to our dedicated team of people across our business, and our supply chain, who work hard every day to deliver our Vision and our Mission to support our customers in the areas that matter most to them.



# Lite n' Easy at a Glance

Lite n' Easy has a wide-reaching manufacturing footprint in Australia, servicing each major city with both frozen and fresh meals.



QUALIFIED TEAM OF

**DIETITIANS  
&  
CHEFS**

DEVELOPING MEALS



We deliver delicious, healthy food for all Australians to enjoy.

To find out more about our business visit [liteneasy.com.au](http://liteneasy.com.au)

## 01.

# Reporting Entities

This Statement has been published in accordance with the *Modern Slavery Act 2018* (Cth) (MSA or Act). It describes the steps the Group took to identify, assess, mitigate and remediate modern slavery risks in its operations and supply chain during F24. Lite n' Easy makes this joint Modern Slavery Statement (joint statement or statement) on behalf of the reporting entities listed below.

As a joint statement, made under section 14 of the Act, we refer to a number of reporting entities:

| Company  | Reporting entity or Voluntary reporting entity |
|--|--|
| Lite n' Easy Pty Ltd ACN 010 655 820 and its subsidiaries <ul style="list-style-type: none"> <li>• Lite n' Easy (VIC) Pty Ltd ACN 153 499 579</li> <li>• Lite n' Easy (NSW) Pty Ltd ACN 165 076 380</li> </ul> | Reporting entities                             |
| Lite n' Easy (QLD) Pty Ltd ACN 066 985 073   | Reporting entity                               |

We use 'Lite n' Easy' or 'Group' when collectively referring to the above entities throughout this statement.

This joint statement was approved and signed by G. Mitchell in his role as the Sole Director of each of the reporting entities on 26 November 2024.



**G. Mitchell**

Managing Director of Lite n' Easy Group

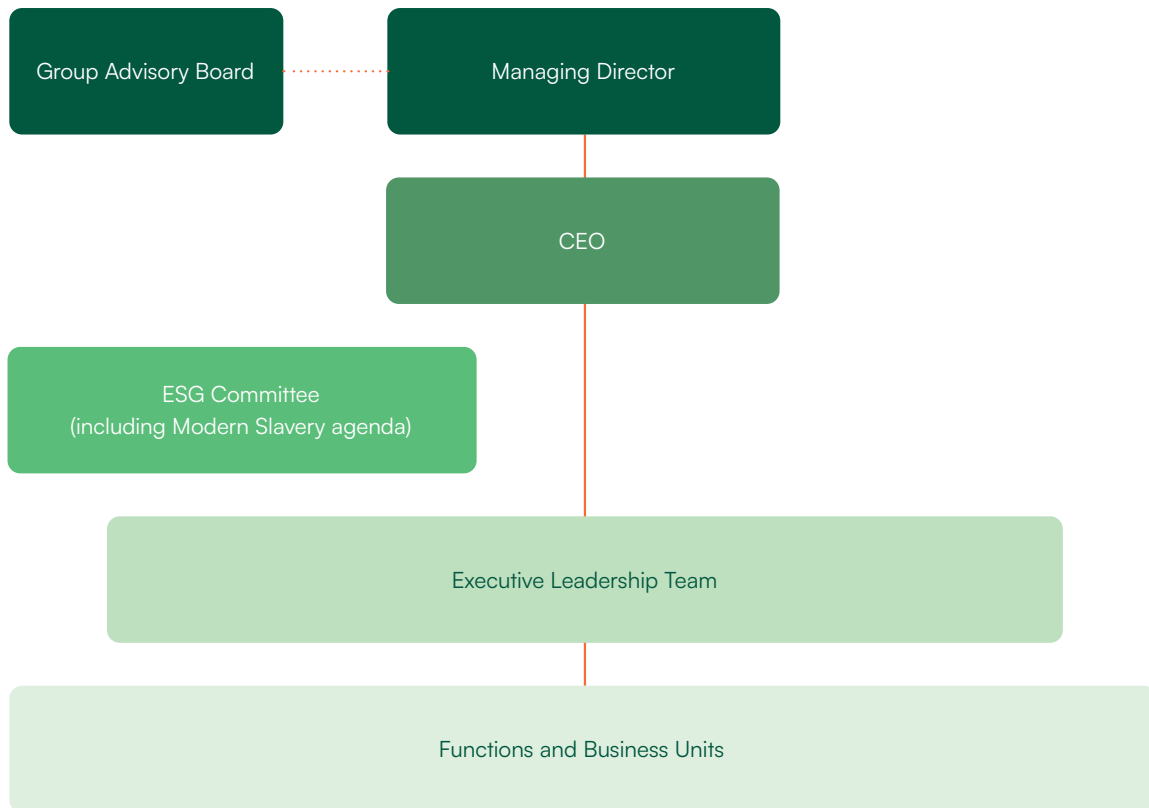


# 02.

## Structure, Operations and Supply Chains

### Our Structure & Governance

Lite n' Easy Group is a private, non-consolidated group of companies with headquarters in Banyo, Queensland. All reporting entities have an ultimate common shareholder and leadership team.



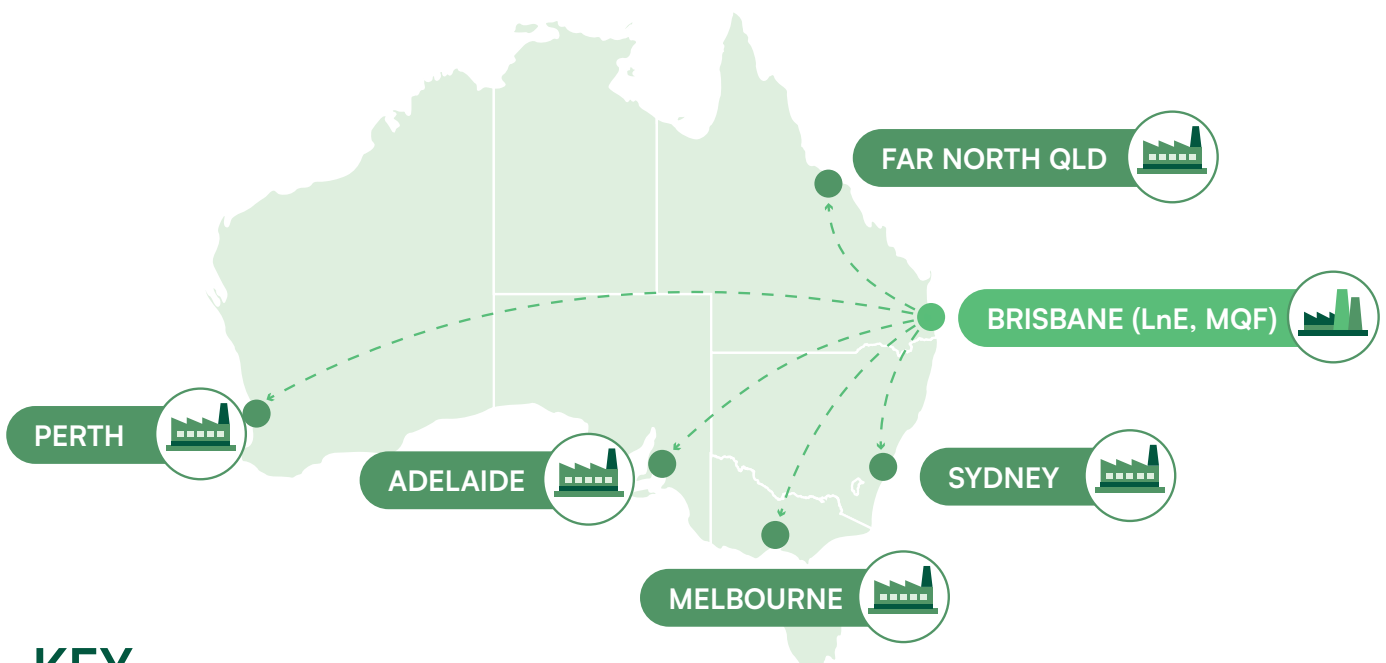
Our risk assessment and management approach are consistent across each of the Lite n' Easy entities covered by this statement. All policies, systems and processes are designed to be applied across the Group. Our ESG Committee oversees matters relating to social governance including reviewing our approach and compliance with the MSA.

## Our Operations

We produce more than 1.5 million meals every week in our 6 state-of-the-art kitchens nationwide. With headquarters and central manufacturing in Banyo, Queensland the company has contact centres around Australia and meals are 'made to order' within each state.

Shared head office functions, executive, and manufacturing of all Lite n' Easy frozen meals is centralised in Brisbane. We source fresh produce, raw materials, and service providers to manufacture and deliver nutritious meals direct to customers and aged care facilities. Our key brands include Lite n' Easy, My Choice, Taste Express and Lite n' Easy Select.

Our workforce comprises more than 1800 team members, the majority of which are employed full-time across our 6 sites in Brisbane, Sydney, Melbourne, Adelaide, Perth, and Townsville. Our operations are wholly based in Australia, we do not employ anyone outside of Australia.



### KEY



**MQF facility** manufactures frozen food  
- shipped to state sites for distribution



**State sites** manufacture fresh food and assemble/pack  
meals for distribution across their state

## Our Supply Chain

We source high quality ingredients, raw materials, and services from both trade and non-trade suppliers.

We view and require our supplier relationships to be both strategic and ethical partners to the business. We predominantly source the meat, vegetables, fruit, and dairy used in our meals locally from within Australia. Our packaging, snacks and portion-controlled items are also manufactured in Australia, using local and imported raw materials. These suppliers have a long-standing reputation within their industry and are aware of modern slavery obligations. We also have non-trade suppliers providing various goods and services to including corporate services, IT and property management.

### Our Tier 1 suppliers fall within the following groups:

- ✓ Fruit & Vegetable
- ✓ Ingredients
- ✓ Meat & Fish
- ✓ Packaging
- ✓ Freight & Stores
- ✓ Energy & Utilities
- ✓ Consumables
- ✓ Waste
- ✓ Trades & Services
- ✓ Property, Plant & Equipment
- ✓ Corporate Services
- ✓ ICT
- ✓ Other

Our procurement model is both centre-led and decentralised. High volume, high spend category purchases are mostly centre-led, while site-specific purchases are decentralised where subject matter experts hold responsibility for departmental purchases.





# 03.

## Risks of Modern Slavery Practices in our Operations and Supply Chains

We are committed to continuously improving our risk identification capability and do this through our ESG Committee in consultation with category specialists. Lite n' Easy recognises that addressing risks in the supply chain requires a long-view commitment to address risk appropriately over time.

Our team members benefit from working in state-of-the-art manufacturing facilities that are 100% located in Australian capital or regional cities. We consider our operations to be low risk for potential human rights breaches. Where possible we source our raw materials domestically with the majority of our Tier 1 suppliers being Australia-based.

### Our Operations - F24 Focus Areas

Supply groups within our operations at higher risk of modern slavery practices:

| Group                              | Risk Level | Potential Risk Area   | Mitigation Approach   |
|------------------------------------|------------|---|---|
| <b>CONTRACTING - AGENCY LABOUR</b> | Low risk   | Low skilled labour — LNE facilities with low-skilled workers <ul style="list-style-type: none"> <li>• Exploitation of low-skilled workers</li> <li>• Excessive working hours</li> </ul> | <ul style="list-style-type: none"> <li>• Confirmation of VEVO right-to-work checks for new team members that are non-Australian citizens or permanent residents.</li> <li>• English proficiency.</li> <li>• Skills training and development.</li> <li>• All workers are paid per national awards or Enterprise Agreements.</li> </ul> |

## Our Supply Chain - F24 Focus Areas

Supply groups within Tier 1 (direct supplier to our Group) of our supply chain known for higher risk of modern slavery practices:

| Tier 1 Suppliers  | Risk Level   | Potential Risk Area   | Mitigation Approach  |
|---|--|---|--|
| <p><b>FRESH AND SEASONAL PRODUCE</b></p> <p>Domestic suppliers of fresh fruit and vegetables</p>  | Low risk in Australia                                | <ul style="list-style-type: none"> <li>• Exploitation of migrant workers</li> <li>• Deceptive recruitment</li> <li>• Underpayment of wages</li> <li>• Excessive working hours</li> </ul>  | <ul style="list-style-type: none"> <li>• Fresh produce is predominantly sourced within Australia.</li> <li>• Established partnerships and strong relationships with horticultural suppliers.</li> <li>• Supplier assurance processes by our Supply Chain and Technical teams and/or Ethical sourcing due diligence.</li> </ul> |
| <p><b>IMPORTED PRODUCT</b></p> <p>Australian-based importers of:</p> <ul style="list-style-type: none"> <li>• Fresh produce and proteins</li> <li>• Ingredients</li> <li>• Packaging</li> </ul> | Medium to high risk where global supply chains exist | <ul style="list-style-type: none"> <li>• Exploitation of workers</li> <li>• Deceptive recruitment</li> <li>• Underpayment of wages</li> <li>• Excessive working hours</li> <li>• Restricted freedoms</li> <li>• Abusive conditions</li> <li>• Debt bondage</li> <li>• Child labour</li> </ul> | <ul style="list-style-type: none"> <li>• Established partnerships with suppliers.</li> <li>• Supplier assurance processes by our Supply Chain and Technical teams and/or Ethical sourcing due diligence.</li> </ul>  |
| <p><b>MEAT PROCESSING</b></p> <p>Domestic suppliers of meat products or render services</p>   | Medium risk in Australia                             | <ul style="list-style-type: none"> <li>• Exploitation of migrant workers</li> <li>• Deceptive recruitment</li> <li>• Underpayment of wages</li> <li>• Excessive working hours</li> </ul>  | <ul style="list-style-type: none"> <li>• Meat products are mostly sourced within Australia.</li> <li>• Established partnerships and strong relationships with suppliers.</li> <li>• Supplier assurance processes by our Supply Chain and Technical teams and/or Ethical sourcing due diligence.</li> </ul>                     |

## Our Supply Chain - Future Focus Areas

Several other supply groups within Tier 1 of our supply chain known for higher risk of modern slavery practices that have been flagged to commence ethical sourcing due diligence in future years include:

| Tier 1 Suppliers  | Risk Level  | Potential Risk Area                                    | Mitigation Approach   |
|---|---|--|---|
| <p><b>IMPORTED PRODUCT</b></p> <p>Australian-based importers of:</p> <ul style="list-style-type: none"> <li>• Personal protective equipment (PPE)</li> <li>• Electronics</li> <li>• Plant &amp; equipment</li> <li>• Cleaning products</li> </ul> | <p>Medium to high risk where global supply chains exist</p> | <p>Recognised as potential risk but not yet mapped</p> | <p>Ethical sourcing due diligence may commence in future.</p> |



# 04.

## Actions Taken in F24 to Assess and Address Those Risks

Lite n' Easy is dedicated to social responsibility, ensuring compliance with national labour standards and fostering decent work conditions throughout our business and supply chain. In F24, we prioritised combatting modern slavery by embedding human rights due diligence to address potential issues related to slavery, human trafficking, and child labour.

### ACTION 1

#### Company Policy Implementation

##### Raising awareness and accessibility of company policies

While several policies were developed and launched in F23, our Policy Committee recognised the importance of their implementation. We prioritised the dissemination of key policies, including those on Modern Slavery, the Employee Assistance Program, Grievance, and Whistleblower. Communicating these policies is crucial in shaping our organisational culture and values. In F24, we communicated these policies through the business using multiple channels:

1. Senior Leadership Team meetings
2. Toolbox talks
3. Webinar series hosted by the Policy Committee
4. Company intranet
5. Publications in canteens across all facilities

By ensuring these policies are well communicated and accessible, we reinforce our dedication to ethical practices and help maintain a fair and inclusive workplace.

#### Human Rights Impact

- ✓ Group standards, values, culture, and benefits are communicated and accessible to all team members.
- ✓ Team members are informed about internal procedures to report suspected modern slavery cases.
- ✓ Helps maintain a fair and inclusive workplace.

## ACTION 2

### Risk Management Plan

#### Procedure for conducting risk assessments in our Supply Chain

A comprehensive risk management plan has been developed to establish a framework and procedure for assessing risks related to modern slavery. By adopting this plan, we have committed to identifying and addressing modern slavery risks, increasing transparency within our supply chains, assessing the effectiveness of actions taken to combat modern slavery, and providing training on ethical sourcing and human rights to employees and suppliers.

Our ethical sourcing risk management program comprises the following risk controls:

- 1. Accountability:** Our ESG Committee is responsible for addressing modern slavery issues.
- 2. Policy:** Our Modern Slavery Policy, and other related policies, directs the company's approach to modern slavery.
- 3. Supply Chain Mapping:** Evaluating modern slavery risks across our supply chain, beginning with Tier 1 suppliers.
- 4. Supplier Due Diligence:** We evaluate suppliers' approach to human rights and managing modern slavery risk through surveys, requests-for-information, and interviews.
- 5. Training:** Our people leaders and office-based team members complete an online modern slavery training course. Production team members receive policy updates through toolbox talks, and training content is provided to suppliers as needed.
- 6. Complaints Mechanism:** Our whistleblower hotline, Stopline, allows confidential reporting of modern slavery concerns, with protection from reprisal and a clear investigation process.
- 7. Remediation:** We will work with our suppliers to remediate suspected breaches on a case-by-case basis according to our Modern Slavery Policy.
- 8. Review and Monitoring:** Our ESG committee monitors and reviews the effectiveness of the risk management measures.

#### Human Rights Impact

- ✓ Framework adopted to guide detailed risk assessment of our operations and our suppliers.
- ✓ Steps to validate the integrity and quality of our supply chains.
- ✓ Enhances supply chain transparency and accountability.

## ACTION 3

### Category Prioritisation

#### Continued focus to mitigate supply chain risks

Last year a comprehensive analysis of vendors and purchase categories was conducted across the Group's supply chain. This work provided the basis for F24 ethical sourcing due diligence activities that were carried out. Supplier selection is based on a range of parameters such as tier, sector or industry, country of origin, expenditure, and category. Our approach continues to prioritise Tier 1 (direct) suppliers in industries with global supply chains or operations in known geographical hot spots for slavery, trafficking, and child labour. Our ethical sourcing due diligence activities in F24 remained focussed on suppliers across categories including:

- 1. Agency labour:** domestic and international labour providers.
- 2. Fresh produce (raw materials):** domestic suppliers of fruit and vegetables.
- 3. Country of origin (raw materials):** Australian-based Tier 1's supplying imported products including:
  - Fresh produce
  - Ingredients
  - Packaging
- 4. Meat processing (raw materials):** domestic suppliers of meat products and render services.

#### Human Rights Impact

- ✓ Risk areas defined for progressive rollout of supplier due diligence.



## ★ ACTION 4

### Ethical Sourcing Due Diligence

#### Validating the integrity and quality of our supply chain

In F24 we developed and launched a new e-survey tool tailored to the nature of our business as an Australian-based food manufacturer. Previous tools used applied an international perspective with limited relevance to the Australian context, which hindered engagement with our predominantly domestic supply partners. By utilising our own survey and risk assessment methodology, the insights gathered guide us in better collaborating with our suppliers to evaluate the strengths and weaknesses within our supply chain. Suppliers are encouraged to share and attach relevant information to the online survey that might assist in demonstrating their own efforts and commitments in preserving human rights and eliminating modern slavery risks from within their own supply chain. Our intention through this tailored process is to work together with our partners to strengthen areas of risk that may be identified.

The survey was rolled out to suppliers in priority categories identified in Action 3. Respondents are ranked based on 'perceived risk' and engagement with suppliers is carried out according to our Risk Management Plan.

#### Vendor response rates for the reporting period were:

- Raw materials — 90%
- Agency labour — 100%

Proactive risk identification within the supply chain is a priority for continuous improvement. Additional vendor categories will be added to the due diligence process over the coming years.

#### Human Rights Impact

- ✓ Tailored approach to risk assessment of our suppliers.
- ✓ Steps taken to validate the integrity and quality of our supply chains.

## ★ ACTION 5

### Workforce Learning

#### Building awareness of the risks across our workforce

During F24, approximately 400 team members comprising executive, managers and supervisors and office-based team members across all departments completed modern slavery compliance e-learning.

#### The course, offered through our learning management system, covers:

- What is modern slavery?
- What can modern slavery entail?
- What is supply chain transparency?
- Legislation around the world
- Australia's modern slavery legislation

#### On completing the course, our staff have a general understanding of:

- The 8 types of modern slavery as defined under the MSA;
- The impact of slavery practices to our business and customers; as well as
- The compliance and reporting obligations under the legislation.

Modern slavery compliance e-learning will continue to be rolled out to Lite n' Easy team members with the requirement to refresh on a regular basis.

#### Human Rights Impact

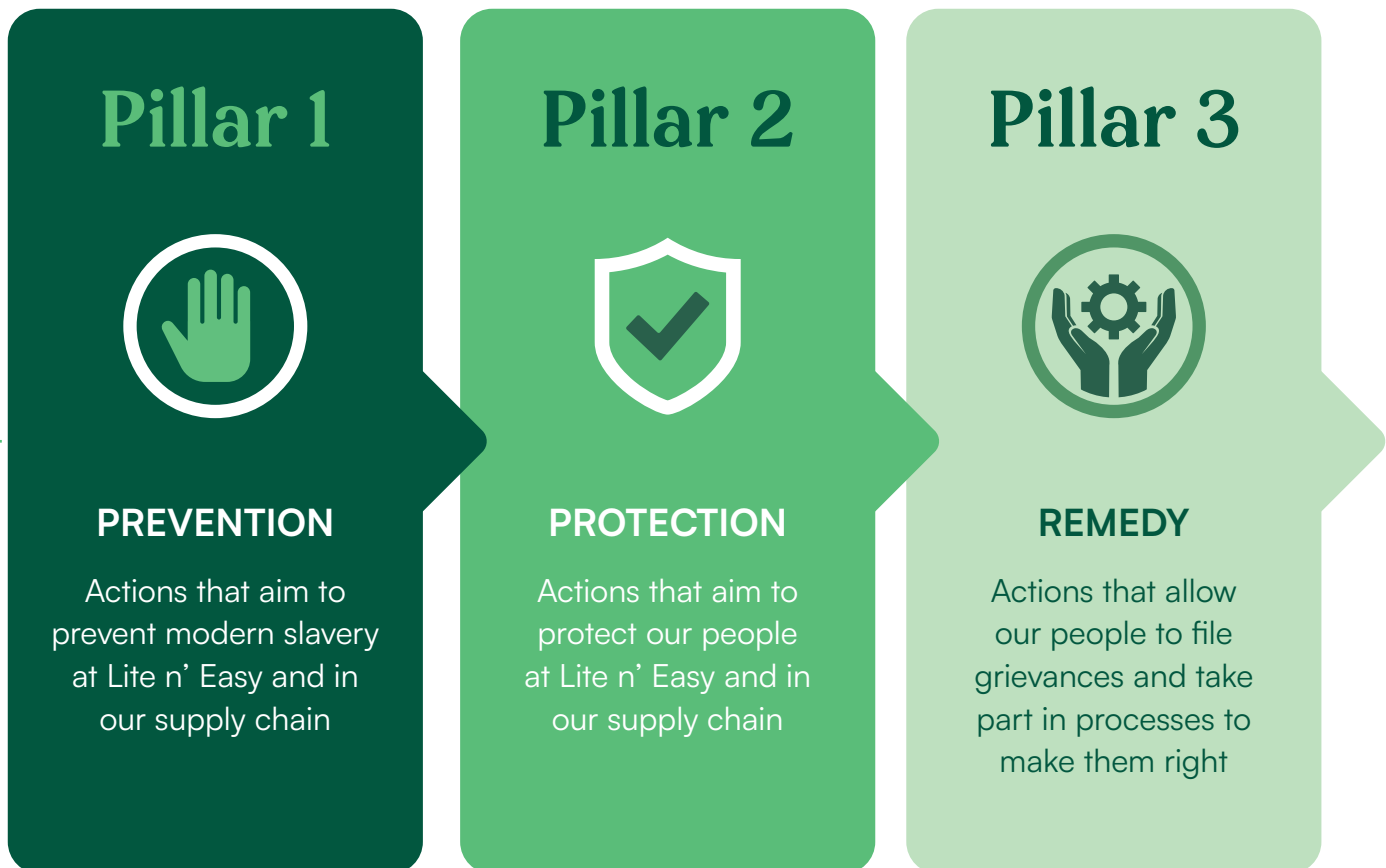
- ✓ Workforce awareness of risk factors and compliance obligations.
- ✓ Knowledge of procedures to report potential suspected cases.

# 05.

## Assessing The Effectiveness of Actions

Lite n' Easy has set practical metrics to assess the progress and effectiveness of our ethical sourcing program. We acknowledge that our success will be dependent on how we measure the implementation of our planned program of work and our ability to refine our approach, as necessary.

The effectiveness of our F24 actions will be assessed across three broad pillars which are adapted from the United Nations Guiding Principles on Business and Human Rights (UNGPs):





## Effectiveness Indicators

| Indicators |  | Metrics   | FY24 Performance  |
|------------|--|---|---|
| PILLAR 1   | ESG Committee (oversight)                          | Number of meetings  | 4   |
|            |  | Planned versus actual modern slavery activities delivered                 | All activities delivered except approved supplier program |
| PILLAR 1   | Policy Committee                                   | Policies maintained according to changes in relevant laws and regulations | No change required or made to relevant MS policies        |
| PILLAR 1   | Policy Inventory                                   | Modern Slavery Policy reviewed in cycle                                   | Yes   |
|            |  | Internal communication of new or updated policies                         | Internal awareness and accessibility campaign (Action 1)  |
| PILLAR 1   | Prioritising Risk in our Supply Chain              | Identification of priority supply categories and suppliers                | Ongoing from F23  |
| PILLAR 2   | Ethical Sourcing Survey                            | Vendor response rate  | Raw materials — 90%<br>Agency labour — 100%               |
|            |  | Average risk-rating result  | Moderate Perceived Risk                                   |
|            |  | Number of remediation action plans and/or RFI's enacted                   | Nil   |
|            |  | Number of human rights breaches identified                                | Nil   |
| PILLAR 2   | Integration with Approved Supplier Program         | Vendor response rate  | On hold   |
| PILLAR 2   | Training - Modern Slavery Online Compliance Course | Number of staff who completed the e-learning course                       | ~400 team members   |
| PILLAR 3   | Grievance and Whistleblower Mechanisms             | Number of human rights related incidents reported                         | Nil   |
|            |  | Number of human rights related incidents remediated                       | Nil   |
|            |  | Broad staff awareness of, and accessibility to, these support mechanisms  | Internal awareness and accessibility campaign (Action 1)  |

Performance against these metrics will be reported on a regular basis to Lite n' Easy's ESG Committee. We intend to review and refine our approach periodically to consider any emerging modern slavery risks.

# 06.

## Consultative Process Across Lite n' Easy Group

In F24, we continued the development and implementation of internal initiatives across our operations that aid in identifying potential risks of modern slavery.

Lite n' Easy is overseen and managed by a common director and leadership team, with all policies, systems and processes designed to be consistently applied across the Group. We apply a uniform approach to risk assessment and management across each of the Lite n' Easy entities covered by this statement. The analysis of modern slavery risks in this statement and our risk management plan applies to all reporting entities covered by this statement.

As a centrally managed group, the consultation process among relevant stakeholders, occurs through our standard business practices and our ESG Committee. This collaborative approach ensures that key personnel and stakeholders, responsible for all reporting entities, are actively engaged in the preparation of this joint statement.



## 07.

# Additional Information

## Mandatory reporting criteria of the Modern Slavery Act

This statement was prepared to meet the mandatory reporting criteria set out under section 16 of the *Modern Slavery Act 2018* (Cth). The table below identifies where each criterion of the Act is disclosed within sections of this statement.

| MSA Reference | MSA Criteria   | Reference in this Statement |
|---------------|--|-----------------------------|
| s16. 1(a)     | Identify the reporting entity  | Page 04                     |
| s16. 1(b)     | Describe the reporting entity's structure, operations and supply chains  | Page 05                     |
| s16. 1(c)     | Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls  | Page 08                     |
| s16. 1(d)     | Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes                 | Page 11                     |
| s16. 1(e)     | Describe how the reporting entity assesses the effectiveness of these actions  | Page 15                     |
| s16. 1(f)     | Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement) | Page 17                     |
| s16. 1(g)     | Provide any other relevant information   | Page 18                     |
| s16. 2(b)     | Details of approval by the relevant principal governing body or bodies   | Page 04                     |

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**Lite n' Easy**

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