

2025 MODERN SLAVERY STATEMENT



Fresh
Produce
Group

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COMPANY STRUCTURE



This Statement applies to Beauty Bay Produce Pty Limited (ABN 93 051 941 854). Within Beauty Bay Produce, the following employing entities operate:

- Fresh Produce Group of Australia (ABN 87 055 359 601),
- Fresh Produce Group Western Australia (ABN 81 152 973 932),
- Treviso Farm Management (ABN 31 144 899 276),
- Tumut Grove Farm Management Pty Ltd (ABN 46 619 756 115),
- Smart Berries Pty Ltd (ABN 39 164 122 945),
- Smart Berries Mundubbera (ABN 30 164 124 903),
- SB Tasmania Pty Ltd (ABN 25 605 860 017),
- Fruitico Pty Ltd (ABN 49 608 313 604),
- Fruitico Farms Pty Ltd (ABN 51 608 318 921),
- Kimberley Table Grapes Pty Ltd (ABN 17 635 953 187), and
- Kimberley Asparagus Pty Ltd (ABN 69 609 891 287).

Collectively these entities are referred to in this statement as 'Fresh Produce Group', 'FPG' or 'The Company'.

The above entities are managed collectively under the same policies, procedures, and guidelines. FPG has a collective approach to managing and mitigating the risks of modern slavery across the group. This statement is submitted on behalf of and prepared in consultation with all of the entities named above and has been approved by the Board of Directors.

INTRODUCTION

This Modern Slavery Statement has been published in accordance with the Modern Slavery Act 2018 (Cth) covering the financial year from 1 July 2024 to 30 June 2025.

Fresh Produce Group is committed to identifying, preventing and mitigating the risk of modern slavery within our operations and supply chain.

Our farms and grower partners in Australia and internationally supply high-quality fresh produce to domestic and international customers. The business comprises growing, packing, importing, exporting, wholesale, pre-packing, ripening, logistics and marketing of produce.

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine their freedom. This statement outlines Fresh Produce Group's assessment of modern slavery risks across our operations and supply chain and describes the actions we take to address these risks and support the protection of human rights.



OPERATIONS

Fresh Produce Group operates across the fresh produce supply chain - growing, importing, packing, ripening, distributing, wholesale and marketing of produce to domestic and international customers.

To meet year-round demand, produce is sourced from three channels: our own farming operations, partnerships with domestic growers, and relationships with international growers who supply produce on a counter-seasonal basis.

This mix of direct operations and external sourcing shapes the workforce profile and supply chain relationships that sit at the centre of our modern slavery risk assessment.

Our farming operations are spread across multiple states in Australia, supported by a network of distribution centres and on-site packing facilities.



SUPPLY CHAIN

Fresh Produce Group sources produce through direct and indirect relationships with domestic and international growers. Across our supply chain, we outsource a range of services, including: logistics, transport, distribution, labour, and information technology. We communicate applicable legal, regulatory and customer requirements to suppliers operating both within Australia and internationally.

During the 2024/25 financial year, Fresh Produce Group partnered with approximately 1,000 trade and non-trade suppliers.

EMPLOYEES



Fresh Produce Group employs approximately 600 full-time, part-time and casual employees across its core workforce in Australia. Due to the seasonal nature of our operations, this workforce expands during peak periods and may include an additional 1,200 seasonal employees each year across our farms and distribution centres.

Our workforce includes seasonal workers directly employed under the Australian Government's Pacific Australia Labour Mobility (PALM) Scheme. Across our farming operations, we employ more than 400 seasonal workers from Pacific Island nations and Timor-Leste.

RISK IN OUR OPERATIONS

Fresh Produce Group undertakes an annual risk assessment of its operations and supply chain to identify and assess potential risks associated with modern slavery practices. Each year, in preparing this statement, we review our risk profile and reassess the effectiveness of existing controls to ensure our approach remains current and aligned with regulatory expectations, industry standards and the evolving nature of modern slavery risks.



Fresh Produce Group has policies, procedures and systems in place to safeguard the rights of employees and minimise the likelihood of modern slavery occurring within our directly employed workforce. As a result, the risk of modern slavery occurring within our operations is considered low due to our control over recruitment, employment practices, payroll and working conditions.

However, the seasonal and labour-intensive nature of horticulture means we rely heavily on migrant workers, including those who are engaged under the Pacific Australia Labour Mobility (PALM) Scheme. We recognise that migrant workers may face heightened vulnerability through language barriers, cultural differences, distance from support networks, and limited familiarity with workplace rights. These workers are a primary focus in our operational risk assessment, and the controls described in the following sections are designed to address that vulnerability.

RISK IN OUR SUPPLY CHAIN

Fresh Produce Group operates within a complex domestic and international supply chain, which can limit visibility beyond direct suppliers. We have identified the following areas as carrying a higher potential risk of modern slavery practices:

Third-Party Suppliers: Fresh Produce Group outsources transport, warehousing, and information technology services. These sectors can carry modern slavery risk where workforces include casual or migrant labour, where sub-contracting reduces visibility over employment conditions, or where services are delivered through extended supply chains we do not directly contract with.

Labour Hire Providers: Fresh Produce Group engages labour hire companies to supply temporary workers during peak seasonal periods. Labour hire arrangements carry heightened modern slavery risk because workers are typically migrants on temporary visas, employment conditions are set and managed by an intermediary rather than by FPG directly, and workers may be unfamiliar with Australian workplace rights or unsure how to raise concerns.

Partner Growers and Suppliers of Produce: Fresh Produce Group sources produce from growers and suppliers across Australia and overseas, both directly and through intermediaries. Modern slavery risk in this category is concentrated in the use of seasonal and migrant labour on farms, in operations located in jurisdictions with weaker labour protections, and in indirect sourcing arrangements where visibility over labour practices at the point of production is reduced.

While we work closely with suppliers and growers and maintain processes to monitor compliance, we acknowledge that residual risks remain where we have reduced visibility or direct control.

ADDRESSING THE RISKS

In addition to reinforcing existing controls, Fresh Produce Group continues to strengthen its policies, procedures, systems and training frameworks to address modern slavery risks across its operations and supply chain.

Our internal policy framework encompasses a range of guidelines and procedures that emphasise our commitment to ethical business conduct. These policies apply across all locations and are subject to annual review. Each plays an important role in mitigating the risks associated with modern slavery.

Code of Ethics	States our commitment to meeting all obligations towards honesty, integrity and the health and safety of staff, customers, and consumers. Holding ourselves accountable in every aspect of the business including staff, customers, suppliers, and community.
Ethical Sourcing Policy	Sets out our commitment to source products in a responsible manner while working with suppliers to improve their ethical practices.
Freedom of Association Policy	States out our commitment to upholding the legal rights of employees and independent contractors to choose whether or not to join a union.
Human Rights and Ethical Trading Policy	States our commitment to ethical and responsible trading practices, consistent with local laws and the international standards outlined in the Ethical Trading Initiative Base Code (ETI Base Code). Outlines our expectations of our suppliers to ensure their practices respect human rights and meet the principles of the ETI Base Code.
Labour Hire Compliance Policy and Procedure	Outlines our approach to manage the risks of engaging labour hire agencies. Sets out our commitment to ensuring all labour hire companies engage in a lawful and ethical manner and explains the methods we use to monitor their compliance with all relevant legislation and standards.
Verification of Entitlement to Work Policy	States our commitment to ensuring all workers engaged have the legal right to work in Australia and explains the method we use to verify the right to work and comply with visa restrictions, limitations or conditions.
Whistle Blower Policy and Reporting Procedure	Outlines our process for the reporting of wrongdoing and protections to support individuals reporting wrongdoing. This policy and procedure encourages individuals, including current or former employees, suppliers, and others they are associated with, to report unethical behaviour and conduct.
Young Workers and Child Labour Policy	States our approach to young labour and child labour with the ultimate aim of ensuring the safety and protection of children.

LABOUR PRACTICES

Fresh Produce Group prioritises direct employment where possible to maintain control over recruitment and employment practices. All new employees must enter employment freely, provide evidence of working rights, age and identity, and complete structured induction and onboarding processes.

Employment arrangements are supported by a centralised payroll system that provides visibility over hours worked, payments and deductions, as well as systems to monitor visa and working rights. We also maintain ongoing processes to monitor working rights for employees on temporary visas to ensure we meet our legal obligations. Together, these measures support a transparent and fair work environment.

To support seasonal workforce requirements, we engage PALM workers and labour hire providers. Due diligence processes are applied to verify compliance with workplace laws and ethical labour standards, and expectations regarding labour practices are clearly communicated to labour hire providers, growers and suppliers.



PALM SCHEME

Within Fresh Produce Group we have entities that are Pacific Australia Labour Mobility (PALM) Scheme approved employers. Since 2018, these entities have participated in the Scheme to recruit workers from the Pacific Islands and Timor-Leste to work on our farms. The majority of our PALM workforce is employed directly under the Short-Term Stream for 6-9 months during our peak periods. We also have skilled workers employed directly under the Long-Term Stream working in ongoing roles for up to four years.

The PALM Scheme is regulated by the Australian Government and workers engaged under the Scheme are sponsored, allowing them to work in Australia on temporary working visas that are tied to their employment.

Because sponsorship arrangements tie workers' visas to their employment, the Scheme carries inherent risk that we actively work to mitigate. Workers have the right to transfer their employment and sponsorship to a new Approved Employer or repatriate to their home country if they choose to cease employment with FPG.

When mobilising PALM workers we cover the upfront cost of travel and visas. Workers authorise the repayment of these costs through payroll deductions. We recognise this arrangement carries indicators of debt bondage risk if not managed carefully, and mitigate this through comprehensive education and transparent communication during pre-departure briefings and induction, which explain the purpose, amount and timing of deductions.



We ensure that workers understand their rights and the options available to them through arrival briefings, fortnightly meetings, and regular communication.

To support the welfare and wellbeing of PALM workers, we employ dedicated Worker Welfare Officers throughout the period of employment. These officers work closely with workers to assist them in understanding their rights while working in Australia. They also help bridge language barriers through translated documentation, assistance with verbal translation, and connections with community organisations representing Pacific Island and Timor-Leste communities.

MONITORING LABOUR HIRE

Fresh Produce Group has internal management systems and procedures to monitor labour hire provider compliance. To partner with us, all labour hire providers are required to have a current labour hire or service agreement in place. Prior to reaching an agreement, providers must supply documentation, including valid labour hire licenses and appropriate insurances. Along with agreements, we distribute a Labour Hire Information Sheet to providers to outline our expectations. Over the past 12 months, Fresh Produce Group has partnered with more than 30 labour hire companies across its locations.

We are committed to monitoring labour hire providers to ensure adherence to ethical standards and compliance with labour laws and regulations.



We conduct regular internal audits to maintain visibility and assess compliance with labour practices and working conditions. These audits include random spot checks, quarterly reviews and annual reviews of each provider. Labour hire providers operating at our SMETA-audited sites are also subject to third-party payroll and employment record reviews as part of those audits.

Through these monitoring activities, we actively communicate expectations to labour hire providers to mitigate the risk of modern slavery practices. Where non-compliance is identified, corrective action is required and may include termination of engagement.

MONITORING SUPPLIERS

Fresh Produce Group maintains an Approved Supplier Program to monitor labour standards across our supply chain. The program includes internal audits conducted through on-site visits and contractual requirements set out in our Horticulture Produce Agreements. Approved suppliers must comply with our Ethical Sourcing Policy and meet expectations aligned with local laws and international standards, including the ETI Base Code, which is based on the conventions of the International Labour Organisation.

As a member of Sedex, we utilise Self-Assessment Questionnaires (SAQs) and Sedex Members Ethical Trade Audits (SMETA) to monitor labour standards, work health and safety, business ethics and environmental management.

Australian partner growers supplying major domestic retailers are also Sedex members and participate in SAQs and SMETA audits. We expect international growers to adhere to the ETI Base Code and maintain management systems that support ethical labour practices, while recognising that direct audit visibility over international operations is more limited than over our domestic supply chain. Over the past 12 months, more than 50 suppliers completed SAQs and more than 30 supplier sites underwent SMETA audits.



INCREASING AWARENESS

Modern slavery awareness is embedded across the business through induction, ongoing training and site-based engagement.

All employees receive modern slavery awareness training as part of induction, supported by an induction handbook and access to policies and reporting mechanisms via the intranet. Our induction includes information on modern slavery risks and our whistleblowing policy and procedure, including the third-party reporting channel available to employees and others to report concerns confidentially.

Awareness is reinforced through refresher training, toolbox talks and targeted education for teams involved in labour sourcing, supplier engagement, compliance and operations. These activities support early identification of risk indicators and clear escalation pathways.

Day-to-day management of modern slavery risks sits with our Human Resources and Technical teams. HR oversees workforce, labour hire and PALM-related controls; the Technical team oversees supplier due diligence and ethical audit processes. These teams work together to identify risks, implement controls and escalate matters to senior management as required.

The Board reviews and approves this statement annually, and receives quarterly updates from Human Resources covering employment matters. The Chief Executive Officers and Chief Operating Officer brief the Board on modern slavery matters as they arise.

Fresh Produce Group is a member of the Approved Employers Association, which represents PALM Scheme employers, and participates in industry bodies including the Australian Fresh Produce Alliance, International Fresh Produce Alliance, Citrus Australia, Berries Australia and the Australian Table Grape Association. Through these memberships, we support advocacy for improved ethical labour practices across the horticulture sector.



ASSESSING EFFECTIVENESS

Fresh Produce Group assesses the effectiveness of its approach to identifying and addressing modern slavery risks through ongoing review, monitoring and continuous improvement. Each year, the preparation of this statement includes a structured review of our risk profile, controls, and learnings from audits, supplier engagement and workforce feedback.

During the reporting period, our focus has shifted from establishing core controls to strengthening their operation and consistency across the business. This has included improving the quality and reach of awareness activities, enhancing oversight of labour hire and supplier compliance, and progressing work on escalation and reporting pathways.

Effectiveness is assessed through internal reviews, third-party ethical audits, labour hire monitoring activities, supplier assurance processes and governance oversight from senior management and the Board. Outcomes from these activities are used to identify gaps, inform priorities and drive practical improvements.

Fresh Produce Group recognises that modern slavery risks evolve over time and remains committed to strengthening controls, increasing visibility and aligning practices with industry standards and emerging best practice.

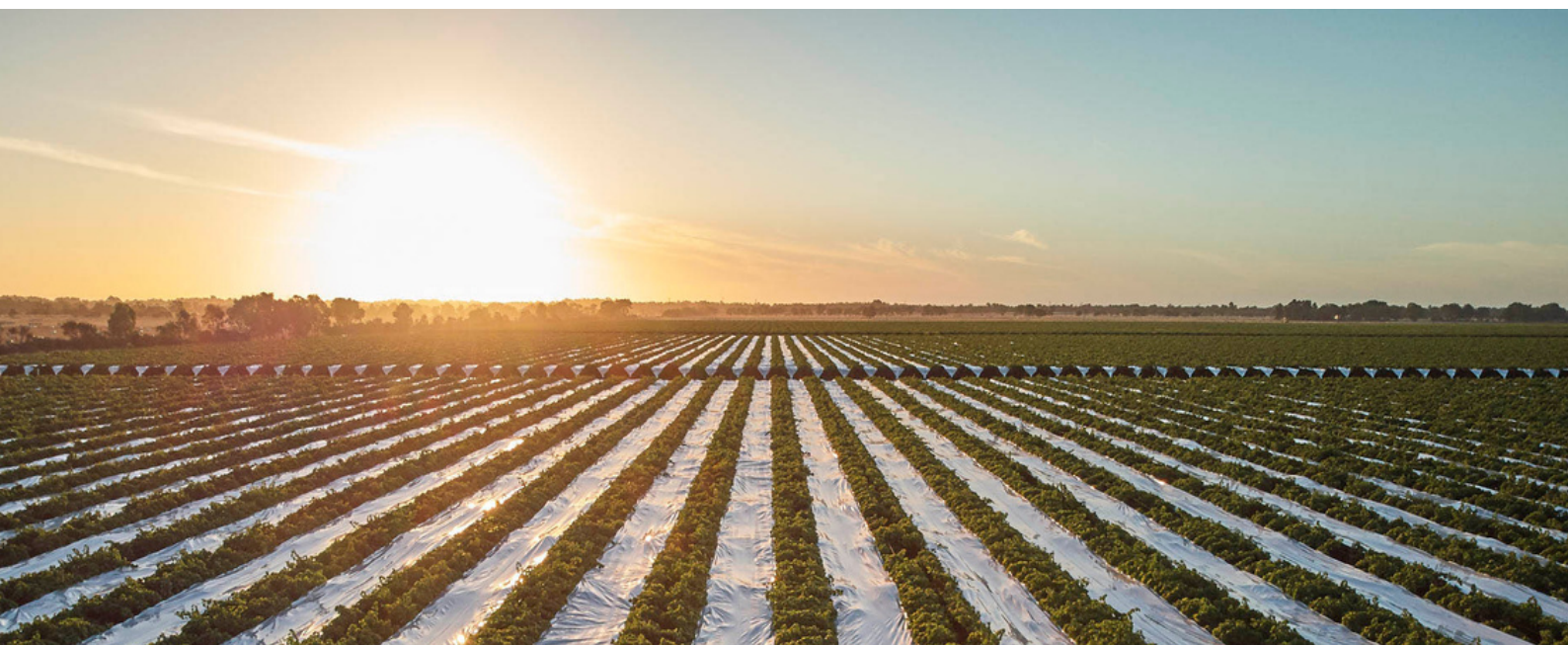


FUTURE FOCUS

Over the next reporting period, Fresh Produce Group will continue to strengthen its approach to identifying and mitigating modern slavery risks. Key focus areas include:

- Further embedding modern slavery awareness through ongoing training, site-based toolbox talks and improved accessibility of policies and guidance via internal systems.
- Continuing to strengthen labour hire and supplier due diligence processes, including increased use of risk-based reviews, follow-up actions, and improved visibility over international supplier operations.
- Formalising internal governance and escalation pathways for modern slavery matters.
- Strengthening how we measure the effectiveness of our controls, including improved data capture across monitoring activities and clearer outcome indicators.
- Maintaining strong oversight of PALM worker welfare, rights awareness and support mechanisms, particularly in the context of evolving regulatory and stakeholder expectations around the Scheme.
- Strengthening direct engagement with PALM sending-country governments and partners, including pre-departure briefings, in-country visits, and collaboration on worker welfare and recruitment practices.
- Collaborating with industry bodies and peers to support improved labour standards and ethical practices across the horticulture sector.

These focus areas support Fresh Produce Group's commitment to continuous improvement and responsible business practices.



STATEMENT OF APPROVAL

This statement has been approved by the Beauty Bay Produce Pty Limited Board of Directors.



ROBERT NUGAN

Chief Executive Officer



ANTHONY POINER

Chief Executive Officer



MANDATORY REPORTING CRITERIA

Criterion	Section and Page
Identify the reporting entity	Company Structure - page 3
Describe the structure, operations and supply chains of the reporting entity	Structure, Operations and Supply Chain - pages 5 to 6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities the reporting entity owns or controls	Assessing the Risks - pages 7 to 8
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address those risks, including due diligence and remediation processes	Addressing the Risks - pages 9 to 14
Describe how the reporting entity assesses the effectiveness of such actions	Assessing Effectiveness - page 15
Describe the process of consultation with any entities the reporting entity owns or controls	Company Structure - page 3 Statement Approval - page 17
Any other information that the reporting entity considers relevant	Future Focus - page 16