



# MODERN SLAVERY STATEMENT

## 2025



FOR THE GREATER GOODNESS

At Harris Farm Markets, we acknowledge the Traditional Custodians of the lands on which we grow, gather, and trade. We pay our respects to Elders past, present, and emerging, recognising their deep connection to this land and its bounty. As we bring fresh, local produce to our communities, we honour the enduring knowledge and care that Aboriginal and Torres Strait Islander peoples have shared with this country for thousands of years. We are committed to walking together, respecting and protecting this shared heritage that sustains us all.

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### ABOUT THIS STATEMENT

This is a Modern Slavery Statement for the financial year ended 30 June 2025 ("Statement"). This statement is prepared for A.C.N 003 933 300 Pty Ltd herein references to "Harris Farm Markets", "Harris Farm", "Group", "us", "we", or "our" in this Statement are references to A.C.N 003 933 300 Pty Ltd and each of our associated business units unless specified otherwise.

Harris Farm Markets registered office is located at Sydney Markets, Warehouse W Parramatta Rd, Homebush NSW 2140.

### CONSULTATION

In preparing this Statement, the Group Head of Sustainability for Harris Farm and the Group Head of Risk actively engaged and consulted with the relevant business units which form part of the Group. This was undertaken by (i) collaborating with the relevant business units and board to provide an overview of the Modern Slavery Act 2018's reporting requirements, (ii) providing information regarding the actions we intend to take to address these requirements including relevant updates, and (iii) seeking feedback from relevant business units and the board with respect to modern slavery matters. This report is the consolidation of the outputs from those efforts.

### HARRIS FARM MARKETS WHISTLEBLOWER HOTLINE

Harris Farm Markets upholds high standards of conduct and welcomes feedback from affected parties to improve our due diligence practices within our operations and supply chains. If you have concerns about modern slavery, potential human rights issues, or unethical behaviour in our operations or supply chain, we strongly encourage you to contact us. Your input is valued, and your right to anonymity protected. Any person may make a disclosure on any Improper Conduct that concerns the Group using the link below or by phone to lodge your report with our third-party provider.

[www.harrisfarmwhistleblower.deloitte.com.au](http://www.harrisfarmwhistleblower.deloitte.com.au)

Call: 1800 954 524 (toll free)



# INTRODUCTION



## CO CEO MESSAGE

At Harris Farm Markets, we've always believed that nature's abundance is both a gift and a responsibility. As a family business, our mission isn't just about selling fresh produce, it's about enriching lives, supporting local communities, and making sure everyone involved in bringing food to our tables is treated fairly and with respect.

*For the greater goodness* is more than a slogan for us, it's what drives every decision we make. Since our beginnings in 1971, our community has grown, and so has the way we give back. From Imperfect Picks and Farmer Friendly Milk to our Neighbourhood Goodness program, we're proud to support our farmers, our customers, and the communities we call home. Just as we follow nature's seasons to bring you the best produce, we're equally committed to protecting the people behind it all.

This year, we took important steps forward in our work to reduce modern slavery risks across our supply chain. We partnered with Edge Impact to develop a new supplier due diligence program and joined forces with Domus 8.7, an Australian not-for-profit helping businesses identify, prevent, and respond to modern slavery. Their expertise and guidance are helping us strengthen our approach and ensure we're meeting our responsibilities under the Modern Slavery Act 2018.

Looking ahead, we're excited to continue this work, rolling out our new framework and deepening our collaboration with Domus 8.7 to create meaningful, lasting change.

Together, we can honour both nature's generosity and the humanity that sustains it.

*Angus Harris*

# THIS YEARS HIGHLIGHTS



## MODERN SLAVERY DUE DILIGENCE FRAMEWORK DEVELOPMENT

Harris Farm worked with an external consultant in FY25 to develop a Modern Slavery Due Diligence Framework. The framework will now form the basis of our approach to managing modern slavery risks in our supply chain. During the development of our Modern Slavery Due Diligence Framework, we continued our engagement with buying teams to further our understanding of the products on our shelves and their buying processes. The Modern Slavery Due Diligence framework also includes a supplier questionnaire for suppliers operating in specific high-risk categories.

## APPROVAL OF NEW RESPONSIBLE SOURCING POLICY

Harris Farm developed a new Responsible Sourcing Policy in FY25. This policy will be shared with our suppliers and outlines the minimum responsible sourcing requirements that our suppliers must adhere to. Modern slavery & human rights forms a critical part of this Responsible Sourcing Policy.

## VENDOR ASSURANCE

We commenced an ongoing programme of work in FY25, which helps us to ensure that we are collecting the relevant information about our vendors and our products, so that we can have greater comfort that we are making great buying decisions which reflect our commitment to high quality and, social and environmental sustainability.

## PARTNERSHIP WITH DOMUS 8.7

We have partnered with Domus 8.7 to join their network of people working to support those who have experienced modern slavery in Australia, as well as working to identify people who may be experiencing modern slavery indicators. We are proud to be joining a network providing such valuable anti-slavery work across Australia.

## HIRING ACROSS RISK, SUSTAINABILITY AND PROCUREMENT

In FY25 we have made several additional hires to support our work in addressing modern slavery risks in our supply chain. These hires include a Head of Risk, Procurement Manager and Sustainability Manager.



## CASE STUDY

### NEIGHBOURHOOD GOODNESS

Following the launch of our new Neighbourhood Goodness strategy in FY24, in FY25 we have continued to support the communities in which we operate. Rooted in Harris Farm's long-standing history of generosity, Neighbourhood Goodness is designed to uplift, empower, and bring people together through targeted, grassroots funding. We support four key pillars through this programme:

Check out the work we've been doing across our four pillars in FY25:

#### HEALTHY & ACTIVE LIFESTYLES

From grassroots sports to fun runs and cycle challenges, we supported over 60 local sports clubs and organisations last financial year to promote health and encourage movement among all ages.

#### COMMUNITY UPLIFT

We help build strong communities through initiatives that foster inclusivity and empowerment, especially for disadvantaged groups. We've provided in-kind support to over 130 local charities and public schools in the last financial year.

#### FOOD SECURITY

No one should go hungry! We partner with local food charities such as OzHarvest, OneMeal and others, donating over 353,854kg of food and more than \$130,000 in food to community organisations; including \$25,000 worth of fruit and veg to schools.

#### CELEBRATING CULTURE

Diversity is at the heart of our communities. We've supported more than 35 events -from school fairs and theatre to writers' festivals and circus shows - that honour culture, heritage and unity.



# 1. ABOUT HARRIS FARM MARKETS

## OUR STORY

Since David and Cathy first opened their fruit stall back in 1971, Harris Farm Markets has always stood for something bigger than selling fresh food. We have been inspired by nature, its abundance, its rhythm, and the way it connects people. This inspiration continues to guide us as we nourish families, support local farmers, and serve the communities we are proud to be part of.

As a 100% family-owned business, we have grown from one humble stall to 31 stores across NSW, ACT and QLD, with more than 3,000 passionate team members who share our belief that good food brings people together and makes life better.

That same belief underpins our purpose to operate for the greater goodness. This means extending our sense of care and responsibility to everyone touched by our business. At the heart of our Modern Slavery Statement is our commitment to Good for Our Family, the social pillar of our sustainability strategy. It is about ensuring that every person in our supply chain is treated fairly, with dignity and respect, and that ethical practices are upheld at every level.

By staying true to these values, we are helping to create an environment where our employees, suppliers, customers, growers, and communities can all thrive, free from exploitation and strengthened by our shared commitment to doing good.

## FOR THE GREATER GOODNESS

**OUR PRINCIPLES:** The four things we believe in, that guide us everyday



## OUR PURPOSE

### FOR THE GREATER GOODNESS

Celebrating good food & all the good things it does for people. Sharing nature's goodness and always acting with goodness.

## MANTRA

### TO RECONNECT US ALL TO THE NATURAL JOY OF FOOD

To bring us all closer to the natural joy of food.  
To have us shop with heads up not heads down.  
To throw away the list and shop with your eyes.  
To truly appreciate nature's seasons and creations.  
And to collectively get behind the positive impact that good food can make to us all.

FOR THE GREATER GOODNESS

## OUR WAY

### BEING MORE MARKET THAN SUPERMARKET

To always act more market than supermarket.  
A pleasure not a chore. An experience of positivity, not just one of necessity. Fresh food direct from the source in hours not weeks.



## OUR STRUCTURE

Founded in 1971, Harris Farm Markets is one of Australia's most loved fresh food retailers. Still 100% family owned, Harris Farm Markets comprises of Retail, Ecommerce and B2B entities, that helps us deliver goodness to our communities everyday.

## OUR OPERATIONS

### BOARD & EXECUTIVE COMMITTEE

Our board supported by our executive committee oversee the running of all Harris Farm subsidiaries.

### SUPPORT OFFICE

Our business is supported by team members working in support functions out of our offices in NSW, QLD, Victoria and a small remote function in the Philippines.

### DISTRIBUTION & PRODUCTION

We operate four distribution centres that supply our store network each day; three in NSW, and one in QLD. We also operate small in-house production facilities within our NSW distribution centres to provide products such as fresh juice, cheese and flavoured yoghurt to our stores.

### OUR STORES

More than just a grocery store, we operate 31 stores across Sydney, Brisbane, Canberra and in key regional areas like Newcastle, Orange, Bathurst, and Albury. Our presence makes us an integral part of the communities we serve as we reconnect Aussies with the natural joy of food.

Many of our stores are also home to our concession partners such as Fish in the Family, and a number of other small, local businesses that we've partnered with to help us bring the best that nature has to offer to our customers each day.

### ECOMMERCE

Our stores are responsible for picking and packing any online orders, which are delivered by our delivery partner, Uber.

### BUSINESS TO BUSINESS

Harris Farm also provides wholesale fruit and vegetable produce to several small, independent food retailers. These are located largely in NSW. Harris Farm operates a stall within the Sydney markets selling fresh produce to market customers.

## HARRIS FARM MARKETS



Figure 1: Our Structure

## OUR TEAM

Our team continues to be the foundation of Harris Farm's success. We are proud to employ a diverse and dynamic workforce of more than 3,000 team members across our head office, stores, and warehouses, along with a small support team based in the Philippines. Together, our people drive a culture of inclusion, collaboration, and respect—ensuring that everyone has an opportunity to contribute and grow.

Our employment model comprises a blend of permanent full-time, part-time, casual, and fixed-term positions, enabling flexibility and career development across all areas of our business. Day-to-day operations are also supported by 34 contractors who provide essential services, including cleaning, trolley collection, and security. We recognise that our strength lies in the diversity of our people, their backgrounds, experiences, and perspectives. This diversity continues to underpin our ability to deliver exceptional service to our customers and to operate with integrity across our supply chain.

3,251 TEAM MEMBERS



## OUR OPERATIONS

### QUEENSLAND

1 x Distribution Centre  
1 x Support Office  
Stores:  
2 x Brisbane  
1 x Gold Coast

### NEW SOUTH WALES

2 x Distribution Centres  
2 x Support Office  
1 x Bathurst Concession  
Stores:  
22 x Sydney  
1 x Newcastle  
1 x Bowral  
1 x Orange  
1 x Albury

### AUSTRALIAN CAPITAL TERRITORY

Stores:  
1 x Canberra

Figure 2: Our Operational Activity

1971

Year Established

31

Number of Stores

4

Number of Distribution Centres

2

Number of Offices

21

Number of Concession Partners

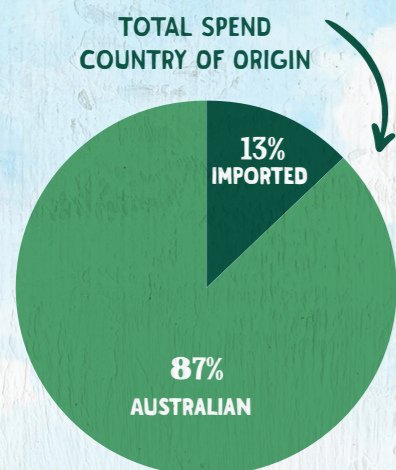
# 2. OUR SUPPLY CHAIN

Harris Farm operates an extensive and diverse global supply network, partnering with more than 1,000 suppliers across both trade and non-trade categories. At the heart of our business is fresh fruit & vegetables, which we procure from over 200 Australian farmers and wholesalers. Our grocery, protein, and dairy ranges are sourced both locally and internationally through a broad mix of direct suppliers and distributors.

In addition to our trade supply chains, we depend on a wide network of more than 1,000 suppliers who deliver essential operational services. These include logistics and transport, maintenance and repair, construction, office supplies, marketing and signage, utilities, cleaning, security, and staff uniforms.

## PRODUCTS WE SELL

Harris Farm sells a range of product categories including fruit and vegetables, grocery, perishables, fresh flowers, proteins, bakery goods and liquor. The biggest category of goods we sell is fruit and vegetables. We are proud that 87% of our products are sourced from within Australia with only 13% being imported.



## FRUIT, VEG & FLOWERS

Harris Farm is committed to transparency and integrity in our fresh produce supply chain. Around 97% of our fruit and vegetables are Australian-grown, with imports limited to seasonal or supply gaps. By prioritising local sourcing, we build strong, enduring relationships with Aussie growers, cooperatives, and wholesalers nationwide.

Our Fresh Team handpicks produce daily at the markets to ensure consistent quality and freshness. We champion fair practices with growers, embracing a total crop solution to minimise waste and maximise returns for farmers. Regular farm visits deepen our understanding of operations and strengthen partnerships with producers who share our values.

Through ethical and transparent practices, Harris Farm upholds the highest standards of social responsibility in fresh produce.



## OUR FRESH SUPPLY CHAIN



Figure 4: Our Fresh Supply Chain

## GROCERY PRODUCTS

Harris Farm currently stocks more than 8,000 products across grocery, liquor, and household categories, supported by a network of over 1,000 direct suppliers and distributors. We continue to place strong emphasis on sourcing Australian-made groceries and, where possible, select non-food items from social enterprises and small to medium-sized businesses. In these cases, we maintain direct partnerships with the suppliers responsible for producing these goods.

A portion of our non-perishable grocery and non-food range is imported and supplied via distributors, enabling us to offer customers a broad assortment of high-quality products. We recognise the complexity of these supply chains and the challenges that can arise from limited direct oversight of producers and manufacturers.

## HARRIS FARM BRAND PRODUCTS

Harris Farm engages a number of third-party vendors to manufacture and supply Harris Farm-branded private label products for purchase in our bricks-and-mortar and online stores. Harris Farm juice, yoghurt and cut vegetables are manufactured in-house from over 90% Australian ingredients. For Harris Farm-branded products that are not produced in-house, we partner with trusted manufacturers who source the majority of their ingredients locally.

## PERISHABLES

Our perishables category includes dairy, dips & antipasto and ready to eat. For this category we prioritise working closely with Australian producers, including small artisan producers. The majority of dairy products including milk, yoghurt, butter, and ice cream sold in our stores are produced in Australia, with a small amount sourced globally to provide a premium selection for our customers.

## PROTEINS

All fresh meat sold at Harris Farm is proudly sourced from Australian producers, with whom we maintain long-standing, collaborative relationships across farming and processing operations. A small portion of our pre-packed range, including selected smallgoods and seafood products, is sourced from reputable global suppliers to complement our local offering.



Figure 6: Our Groceries Perishables & Proteins Supply Chain

## CONCESSION STORES

At Harris Farm we proudly partner with concession businesses that reflect our values, like Infinity Bakery, Fish in the Family, and Salumi Australia. These partners share our commitment to providing high-quality, responsibly sourced products.

Each concession store is responsible for its own sourcing and supply chains.

As part of our approach to addressing modern slavery, we are actively engaging in conversations with our concession partners to raise awareness of modern slavery risks and encourage alignment with our standards. By fostering these discussions, we aim to build greater transparency and accountability across our broader network, ensuring that together we contribute to ethical and sustainable practices.

## NON-TRADE

Non-trade and goods not for resale products and services are critical to our daily operations and store support functions. Harris Farm has over 1000 non-trade vendors who supply resources, goods and services that support our remaining operations including: IT software and hardware, building materials and construction services, transport and storage services, packaging and Personal, Protective Equipment consumables, cleaning services and supplies and marketing materials.

This supply chain is very long, opaque, and complex, and Harris Farm has limited visibility of the supply chain beyond the direct suppliers we work closely with.

In FY25 we have hired a procurement specialist to support modern slavery mitigation in the non-trade category of our business. There is a particular need to focus on cleaning and uniform procurement which will be addressed in coming periods.

## OUR CONCESSION PARTNERS



## CASE STUDY

## RESPONSIBLE SOURCING POLICY FORMALISING OUR APPROACH

At Harris Farm, we prioritise products and partnerships with vendors and concession stores that reflect our values and offer high-quality, responsibly sourced products. As a means of formalising this priority, in FY25, Harris Farm developed a Responsible Sourcing Policy which reflects our current approach to sourcing high quality and responsibly sourced products.

Acknowledging that we do have high risk products on our shelves, we have taken the step of developing this policy and will be ensuring that all vendors agree to this policy in FY26. Additionally, we have commenced our vendor assurance work in FY25, which will help us to ensure that we are collecting and have accurate information that reflects the products on our shelf and the vendors that we work with. This will enable us to ensure that our vendors are adhering to our responsible sourcing policy.

By focusing on our vendor assurance work, Harris Farm will have a greater ability to address modern slavery risks but also enable us to ensure that the products on our shelves have a greater sustainability attributes in general.

# 3. UNDERSTANDING & ADDRESSING OUR RISKS



## ASSESSING OUR BUSINESS RISKS

Harris Farm continues to assess the risk of modern slavery within its direct workforce as low. During the reporting period, we conducted an Operations Risk Assessment across our sites, using publicly available sources such as the Global Slavery Index to identify potential vulnerabilities and confirm the strength of existing controls.

Our workforce includes permanent, part-time, casual, and fixed-term employees across stores, distribution centres, and head office. All receive wages above award rates, superannuation, leave benefits, and access to grievance processes. These entitlements and details of our Employee Assistance Program are explained during onboarding to ensure staff understand their rights and available support.

While our assessment confirms a minimal risk of modern slavery, we acknowledge that low risk does not mean no risk. Employees on temporary or student visas and those in roles requiring limited English proficiency — such as trolley collection or certain warehouse positions — may face higher vulnerability. We mitigate these risks through targeted communication and support from store teams to ensure all employees are informed and protected.

Subcontracted services, including cleaning and security, are considered within our broader supply chain risk assessment outlined below.

## ASSESSING OUR SUPPLY CHAIN RISKS

In FY20, Harris Farm completed a comprehensive assessment of modern slavery risks across our direct operations and supply chains, focusing on spend-based risk using a life cycle assessment (LCA) methodology. This assessment drew on internationally recognised sources, including the Social Hotspot Database and an extensive literature library, to examine potential human rights risks throughout key stages of our procurement cycle — from raw material extraction and processing through to manufacturing, transportation, packaging, delivery, and disposal.

The analysis identified areas within our operations and supply chains with higher inherent risks of modern slavery or other human rights concerns, taking into account both industry and geographical factors. Each category was evaluated for its potential impact and likelihood of risk, consistent with the Australian Government's recommended framework and the United Nations Guiding Principles on Business and Human Rights (UNGPs). This enabled us to prioritise areas of concern and define a structured approach to mitigation.

Our findings highlighted several supply chain segments with more significant human rights implications and opportunities for targeted action. Through a dedicated workshop, we examined where Harris Farm held the greatest leverage and could most effectively influence outcomes. Prioritisation focused on high-spend categories and suppliers with closer operational relationships, while acknowledging our more limited influence on distant, large-scale suppliers.

THE UNITED NATIONS 'GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS SET OUT A THREE-PART CONTINUUM OF INVOLVEMENT THAT OUTLINES HOW BUSINESSES CAN BE INVOLVED IN ADVERSE HUMAN RIGHTS IMPACTS, INCLUDING MODERN SLAVERY.

### CAUSE

A business may cause modern slavery or other human rights harm where its actions directly result in modern slavery occurring.

### CONTRIBUTE

A business may contribute to modern slavery or other human rights harm where its actions or omissions facilitate or incentivise modern slavery.

### DIRECTLY LINKED

A business may be directly linked to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in businesses' extended supply chain.

## GROWTH IN FY25

Building on this foundation, in FY25 we refined our initial assessment as part of developing our Modern Slavery Due Diligence Framework. Working with Edge Consulting, we undertook detailed process mapping with our buying teams to deepen our understanding of specific purchasing categories and associated risks.

This process allowed us to refine the identification of high-risk supplier categories and apply targeted mitigation measures to those areas where Harris Farm has the greatest capacity to influence positive change.



## OUR PRIORITY RISK AREAS

The below table outlines our priority risk areas based on our initial, and subsequent refinement conducted in FY25.



	RISK LIKELIHOOD	RELATIONSHIP TO RISK	KEY RISK FACTORS	FY25 HIGH RISK REFINEMENT
FRUIT & VEG	Very High	<p><b>Contribute:</b> Through sourcing practices. Harris Farris may rely on suppliers who use subcontracted or unregulated labour.</p> <p><b>Directly linked:</b> To labour exploitation in farms or packing facilities.</p>	<ul style="list-style-type: none"> <li>- High reliance on seasonal and migrant labour in Australia</li> <li>- Payment below minimum wage, debt bondage through Recruitment fees.</li> <li>- Poor working conditions, excessive hours.</li> </ul>	Fruit & Vegetables sourced direct from grower
OTHER GROCERIES	Very High	<p><b>Contribute:</b> Through reliance on suppliers without robust labour controls.</p> <p><b>Directly Linked:</b> To labour exploitation in processing facilities or farms.</p>	<ul style="list-style-type: none"> <li>- Risks include forced labour in production of sugar, cocoa, and processed goods.</li> <li>- Exploitation in Tier 2/3 suppliers due to poor oversight.</li> <li>- High-risk sourcing regions like West Africa and Southeast Asia.</li> </ul>	Own Brand Tinned Tomatoes Tinned/ Pre-packaged Seafood (Tuna, Salmon)
BEEF	High	<p><b>Contribute:</b> Through reliance on suppliers without robust labour controls.</p> <p><b>Directly Linked:</b> To labour exploitation in processing facilities or farms.</p>	<ul style="list-style-type: none"> <li>- Risks in meatpacking plants (e.g., underpayment, excessive working hours).</li> <li>- Migrant labour exploitation in cattle production (e.g., Australia).</li> <li>- Limited visibility into Tier 2 suppliers for feed or farming inputs.</li> </ul>	Red meat sourced direct from abattoir

## DUE DILIGENCE FRAMEWORK

Table 1: Our Priority Risk Areas

In FY25 Harris Farm collaborated with Edge Impact to develop a Modern Slavery Due Diligence Framework which focuses on our refined Risk Priority areas and is proportionate to the resource and ability to influence our supply chain. Harris Farm's Due Diligence Framework will apply to all suppliers, with all suppliers being required to adhere to our responsible sourcing policy. For other suppliers which have been captured in our refined high-risk category, an additional layer of due diligence will be applied including targeted supplier engagement. For any suppliers which do not satisfy our requirements following targeted supplier engagement, a further layer of monitoring will be applied to these suppliers.

## ORGANISATIONAL STRATEGY

Our approach to human rights in our operations and supply chain is informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs), our sustainability manifesto and risk management framework. Our governance structures, including the Board and executive leadership, continue to play a crucial role in overseeing and implementing our Human Rights Policy.

The growth of the sustainability team has been key in integrating our human rights agenda into our broader sustainability goals. Our 2025-2028 Sustainability Strategy includes Modern Slavery as part of the overall sustainability framework, with a key theme of the strategy being "human rights & ethical value chain". Within this, a core element of our approach to managing modern slavery risk, is ensuring our team have a clear understanding of the role they play in our modern slavery risk management systems. Every Harris Farm team member has a role in managing modern slavery risks, though their responsibilities may differ depending on their position. Ultimately, accountability for modern slavery risk management begins at the Board level.

## PARTNERING WITH DOMUS 8.7

Domus 8.7 is an Australian not-for-profit organisation established under the Australian Catholic Anti-Slavery Network (ACAN) and the Archdiocese of Sydney. Its name references UN Sustainable Development Goal 8.7, which calls for the eradication of forced labour, human trafficking and child labour.

The organisation provides specialist support for individuals impacted by modern slavery and practical guidance for businesses to meet their obligations under the Modern Slavery Act 2018 (Cth). Services include case management, remediation advice, training, and the development of grievance and reporting mechanisms.

While Harris Farm Markets has not identified any instances of modern slavery in its operations or supply chains, we recognise the importance of being prepared to respond responsibly as well as the opportunity for us to be able to support such important work across Australia. We are proud to partner with expert organisations such as Domus 8.7, to ensure that we can access specialist support and maintain best-practice standards in protecting human rights and worker wellbeing.



## OUR GOVERNANCE

Core to our approach is ensuring our team have a clear understanding of the role they play in our modern slavery risk management systems. All staff have a role to play with respect to modern slavery risk management, but their accountabilities vary by role. Accountability for modern slavery risk management starts with the Board.

<b>OWNERS &amp; BOARD</b>	Board & Shareholders Maintain oversight of human rights (including risks related to modern slavery) across our operations and business processes			
<b>EXECUTIVE &amp; STEERING COMMITTEES</b>	Executive Accountable for the implementation of our human rights programme		Risk & Sustainability Committees Responsible for oversight of Harris Farm's response to human rights and provides guidance to the board	
<b>INDUSTRY EXPERTS</b>	Harris Farm also engages third party consultants to advise on modern slavery risk & risk management			
<b>BUSINESS FUNCTIONS</b>	Sustainability Promotes information exchange across the group on implementation of sustainability-linked goals, including modern slavery	Health, Safety & Risk Responsible for ensuring compliance with relevant laws and regulations related to modern slavery; both domestically and internationally	People & Culture Accountable for ensuring employees are subject to relevant awards and industrial instruments	Category Buyers Accountable for the identification and response to modern slavery risks within our trade supply chains
	Finance Accountable for the onboarding of new suppliers, ensuring modern slavery compliance		Line Management Accountable for the identification and response to modern slavery risks within their departments	
<b>OPERATIONAL STAFF</b>	Responsible for the identification of modern slavery risks within our operations and supply chains, consistent with our company values			

Table 2: Our Governance Framework

## OUR POLICIES

Maintaining and meaningfully implementing effective policies around issues such as modern slavery is a key part of meeting our commitment to more sustainable and ethical leadership. Our key policies are summarised below:

POLICY	RELEVANCE TO MODERN SLAVERY
<b>HUMAN RIGHTS POLICY</b>	The purpose of this policy is to outline the fundamental elements of Harris Farm's approach to human rights; and how Harris Farm demonstrates its commitment to respecting human rights in line with the Universal Declaration of Human Rights and other international frameworks.
<b>GRIEVANCE RESOLUTION POLICY</b>	The intent of this policy is to provide a process for the appropriate and effective resolution of grievances. Everyone is entitled to fair treatment under these procedures.
<b>WHISTLEBLOWER POLICY</b>	The Whistleblower Policy ensures employees and other workers can raise concerns about serious wrongdoing, including unethical, illegal, corrupt, or inappropriate conduct, without fear of victimisation, harassment, or discrimination. This Policy applies to: Employees, Directors, Officers (including employees of contractors), Suppliers, Consultants, Family members of all entities within the Harris Farm Markets Group ("Workers")
<b>CODE OF CONDUCT</b>	This policy provides guidance as to the ways Harris Farm expects all employees and contractors to behave at work and when representing the company.
<b>SUPPLIER AGREEMENT</b>	This Supplier Agreement outlines the key commercial terms under which the supplier will supply the products or goods to Harris Farm. This includes compliance to all relevant laws including Modern Slavery Act.
<b>ANTI-BULLYING, HARASSMENT &amp; DISCRIMINATION POLICY</b>	This policy promotes a workplace that respects individual dignity and safeguards against abuse or mistreatment.
<b>DIVERSITY &amp; INCLUSION POLICY</b>	At Harris Farm we employ a diverse range of people from different backgrounds and with different points of view. We aim to build a culture and environment in which these differences are respected and valued. An inclusive culture which expects and rewards behaviours that support all our people to reach their full potential.
<b>RISK FRAMEWORK</b>	Identifies and manages modern slavery risks across our operations and supply chains to uphold human rights, ensuring appropriate controls and mitigation strategies.
<b>SUPPORT WORKER POLICY</b>	The purpose of this policy is to ensure that support workers are selected, employed, and managed in a manner that aligns with Harris Farm goals, promotes a positive and safe work environment, and maximizes client satisfaction. It aims to provide managers with a framework for consistent and fair practices throughout the employment lifecycle.
<b>WORKPLACE HEALTH &amp; SAFETY PROCEDURES</b>	The aim of this policy is to ensure that employees, contractors, visitors and customers understand what we expect, and what we will do to reduce the risk of an injury occurring; to maintain quality for our customers and to protect the environment.
<b>FINANCIAL HARDSHIP POLICY</b>	Supports fair treatment and access to assistance, reducing the risk of financial exploitation among employees and contractors.
<b>CLIMATE &amp; SUSTAINABILITY POLICY</b>	Outlines our commitment to reducing our environmental footprint and contributing to our community (employees, customers and suppliers) by promoting sustainable practices throughout our operations and supply chain.
<b>RESPONSIBLE SOURCING POLICY</b>	Outlines our approach to responsible sourcing, guides buying practices and also sets out our expectations of our suppliers.

Table 3: Our Policy Framework

## BUILDING OUR CAPABILITY & AWARENESS

### MODERN SLAVERY AWARENESS E-LEARNING

This year, Harris Farm reissued its Mandatory Modern Slavery Awareness E-Learning module for all employees as part of our commitment to proactive action and positive change in addressing modern slavery risks.

The module helps employees identify potential modern slavery risk indicators, including how Harris Farm could cause, contribute, or be directly linked to modern slavery through our supply chain relationships. The training also highlights Harris Farm's governance framework, including clear escalation and reporting channels for suspected breaches. This ensures any identified concerns are promptly directed to the appropriate team members for investigation and resolution.

By implementing this initiative, we aim to empower our team to recognise and respond to modern slavery risks, reinforcing our commitment to ethical and responsible business practices.

### TARGETED TRAINING PLANS

With the launch of our new partnership with Domus 8.7, to enhance our team's ability to identify and respond to modern slavery we will deliver more comprehensive modern slavery training for our retail team. For our buying teams, we will engage an external consultant to facilitate training workshops, to help to embed modern slavery awareness and mitigation into their day to day work. We will continuously expand the scope and depth of training to align with the evolving needs of different roles within our governance structure, ensuring we effectively assess and mitigate modern slavery risks.

### OUR PARTNERSHIPS

To effectively address and mitigate modern slavery risks, we partner with a number of organisations.

Collectively these efforts increase our capability and enable Harris Farm to contribute to the development of more ethical business practices.



### CASE STUDY

**96%**  
of retail staff trained in FY24

**86%**  
of support office staff trained in FY24



### OUR ENGAGEMENT

#### AUSTRALIAN RETAILERS ASSOCIATION

Harris Farm collaborates with the Australian Retailers Association to share insights, resources, and best practices for addressing modern slavery risks within the retail sector and supply chains.

#### EDGE IMPACT

Edge Impact provides trusted professional advice to Harris Farm in relation to our modern slavery strategy. Edge Impact performed our original Social Life-Cycle Assessment (S-LCA) risk assessment, the development of our due diligence framework and has assisted in the drafting of this modern slavery statement.

#### FAIR WORK

Harris Farm engages with Fair Work to ensure compliance with workplace regulations, promote fair labour practices, and address potential risks related to modern slavery in employment.

#### VICTUAL

Engaged to advise on approach to organisational risk management & update risk matrix in FY24 and ongoing. This included a renewed focus on human rights and modern slavery, updating the risk ownership and mitigation controls.

#### DOMUS 8.7

We have joined the Domus 8.7 network which provides its members with access to its anti-slavery resources. Resources include grievance mechanism, support services and a network of people committed to mitigating Modern Slavery.

Table 4: Our Partnerships Regarding Modern Slavery

## OUR GRIEVANCE & REMEDIATION APPROACH

Harris Farm upholds high standards of ethical conduct and is committed to fostering a culture that encourages feedback from all stakeholders, including team members, suppliers, and affected communities. We understand that raising concerns can be challenging, so we have developed accessible grievance mechanisms that empower individuals to voice concerns about modern slavery, human rights issues, or unethical behaviour confidently and securely.

Harris Farm ensures that grievances are handled with care and provides support to those raising concerns by:

- Protecting anonymity where requested;
- Treating individuals fairly and respectfully throughout the grievance process;
- Ensuring access to remedies when harm is identified; and
- Protecting against retaliation for raising concerns



### KEY ELEMENTS OF OUR APPROACH

#### GRIEVANCE SYSTEM

**Internal:** Our internal grievance system enables all Harris Farm employees, contractors, and on-site partners to raise concerns confidentially. Concerns can be reported directly to their immediate supervisor, the HR team, or through a dedicated grievance email channel. This system ensures timely, confidential resolution within the business.

**External:** As a part of Harris Farm Markets membership with Domus 8.7, we will transition to using the Domus 8.7 grievance mechanism, which will operate alongside our existing internal grievance process. This provides an independent and confidential channel for anyone working within our supply chain to raise concerns and, where needed, access appropriate support and referral services.

#### WHISTLEBLOWER SYSTEM

**Purpose, audience, and access:** Our whistleblower system allows employees, contractors, suppliers, and their workers to report genuine concerns about misconduct, unethical behaviour, or suspected modern slavery without fear of reprisal. This system is available via an anonymous link on our internal portal for employees. External stakeholders, such as suppliers or concession partners, can access the system through a secure contact form on our website or by reaching out to the designated whistleblowing officer.

#### TRAINING AND AWARENESS

We ensure all employees and relevant stakeholders receive training on our grievance mechanisms and modern slavery policies to foster a culture of transparency and accountability.

#### CONTINUOUS IMPROVEMENT

Our grievance and remediation processes are reviewed regularly to ensure alignment with best practices and evolving legal standards. This reflects our commitment to identifying and addressing risks of modern slavery effectively and proactively.

By embedding robust grievance and remediation mechanisms into our governance framework, Harris Farm aims to ensure that any concerns are addressed promptly and that we uphold our values of fairness, integrity, and respect for human rights.

# 4. MEASURING EFFECTIVENESS

Harris Farm evaluates the effectiveness of its actions to address modern slavery risks by setting targeted goals within our sustainability manifesto aligned with its highest-risk areas and regularly monitoring progress against these goals.

THEME	COMMITMENT	PROGRESS
<b>RESPONSIBLE SOURCING</b>	<p>Better understand our supply chains through supplier surveys and engaging our concession partners.</p> <p>Conduct an internal responsible sourcing benchmarking.</p> <p>Ethical and sustainable sourcing review: develop a responsible sourcing policy and then, develop a due diligence process that can be integrated into the procurement process.</p>	<p>Surveyed 70% of our suppliers by spend for modern slavery activity and maturity.</p> <p>Developed Responsible Sourcing Policy which was endorsed by leadership, as a key element of our modern slavery due diligence framework.</p>
<b>TRAINING AND AWARENESS</b>	<p>Close the gap with non-retail modern slavery awareness training versus retail.</p> <p>Conduct buyer-specific training with a refresher workshop on mitigating modern slavery risks through procurement.</p>	<p>Successfully trained 94.5% of the workforce on modern slavery awareness, aiming to achieve full coverage in the next phase.</p> <p>Buyers were engaged throughout the development of our Due Diligence Framework &amp; Responsible Sourcing Policy. Modern slavery specific workshops planned for FY26.</p>
<b>COLLABORATION</b>	<p>Utilise our existing network to identify the effectiveness of the steps we have taken.</p> <p>Engage with relevant supply chain to enhance our knowledge and understanding and improve our risk identification.</p>	<p>Engaged suppliers to understand their maturity with collaboration planned for FY26.</p> <p>Begun partnership with Domus 8.7 in FY25.</p>
<b>GOVERNANCE</b>	<p>Develop a framework for measuring the effectiveness of our actions, including specific metrics and KPIs.</p>	<p>Developed Due Diligence Framework in FY25 and will be continuing with implementation in FY26.</p> <p>Began vendor assurance program to improve the process around vendor data collection and compliance with our Responsible Sourcing Policy.</p>

Table 5: Update on Last Years Commitments



# 5. NEXT STEPS



## OUR FUTURE ROADMAP

At Harris Farm, we know there is still a long road ahead to reduce the potential modern slavery risks within our supply chain. We have identified a broad range of activities that will contribute towards our future Modern Slavery Roadmap.

AREA	FUTURE ACTIONS
<b>RESPONSIBLE SOURCING</b>	<ul style="list-style-type: none"> <li>Distribute our Responsible Sourcing policy to all suppliers.</li> </ul>
<b>TRAINING &amp; AWARENESS</b>	<ul style="list-style-type: none"> <li>Enhance our modern slavery awareness training with Domus 8.7</li> <li>Engage a consultant to facilitate workshops and training on modern slavery with our buyers.</li> </ul>
<b>COLLABORATION</b>	<ul style="list-style-type: none"> <li>Work with Domus 8.7 to understand where we can collaborate on modern slavery mitigation work.</li> <li>Conduct supplier workshops to communicate our expectations relating to modern slavery and human rights and to communicate our Responsible Sourcing Policy.</li> </ul>
<b>GOVERNANCE</b>	<ul style="list-style-type: none"> <li>Implement our modern slavery due diligence framework into BAU practice.</li> <li>Continue to improve our vendor assurance to ensure that all relevant modern slavery related information is captured during onboarding and on an ongoing basis.</li> <li>Consider and assess the development of an audit program as a part of our modern slavery work.</li> </ul>

Table 6: Our Future Roadmap

The purpose of this Statement is to provide general information only as required by the Modern Slavery Act and is correct as at the date of publication. Harris Farm Markets are the parent companies of the reporting entities within the Harris Farms Group (including, for the avoidance of doubt, all reporting entities listed in this Statement). This Statement was approved by the Boards of the Harris Farm Markets, being the principal governing bodies of each of the reporting entities respectively.



**FOR THE GREATER GOODNESS**