



# Modern Slavery Statement

2024



## Acknowledgement of Country

*The SunRice Group acknowledges the Traditional Owners and Custodians of the lands on which we live, work and operate. We pay our respects to Elders past and present and acknowledge their continuing connection to land, waters and community.*

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# About this Statement

This Modern Slavery Statement (Statement) is made in accordance with the *Australian Modern Slavery Act 2018 (Cth)* (Act) and also meets the disclosure requirements of the *UK Modern Slavery Act (2015)* and the *California Transparency in Supply Chain Act (2010)*. This is a joint Statement made under section 14 of the Act, for Ricegrowers Limited (SunRice) ABN 55 007 481 156 and Riviana Foods Pty Ltd (Riviana Foods) ABN 97 061 388 092, which we have determined are reporting entities under the Act. This Statement describes the actions taken by the reporting entities, and their owned and controlled entities, to assess and address modern slavery risks in our operations and supply chains for the reporting period 1 May 2023 to 30 April 2024, which is our financial year (FY24). It is our fifth statement.

Unless expressly stated otherwise, references in this Statement to ‘SunRice Group’ and ‘Group’ refer to Ricegrowers Limited, Riviana Foods Pty Limited and the other owned or controlled entities of Ricegrowers Limited. Their operations and supply chains form part of the operations and supply chains of the reporting entities<sup>1</sup>. All policies, processes and activities discussed in this Statement are applicable to SunRice Group, unless otherwise specified. A full list of our owned and controlled entities is provided in Appendix 2.

The Statement was approved on 30 August 2024 by the SunRice Board and signed by Paul Serra, SunRice Group CEO and Managing Director and Laurie Arthur, Chair of the Board, on behalf of both reporting entities.

1. Refer to pages 19–43 of our 2024 Annual Report for a description of our operating segments and businesses and page 126 for a full list of Ricegrowers Limited’s owned and controlled entities that comprise the SunRice Group. SunRice Group entities are also listed in Appendix 2 of this Statement.



## SunRice Group Speak Up

At the SunRice Group, we are committed to ensuring our people, community members impacted by our activities, our customers and those in our supply chain have access to an effective grievance mechanism. If you have concerns about human rights issues including modern slavery in our operations or supply chain, it’s important to speak up. You can make a report via the channels set out below.

All reports will be treated confidentially. If you would like to make an anonymous report, you can use the Speak Up hotline.

**To report a concern to the SunRice Group directly:**

**Email:** [ABCreporting@sunrice.com.au](mailto:ABCreporting@sunrice.com.au)  
**Post:** PO Box Q166 QVB  
 Post Shop, NSW 1230 Australia  
**Call:** +61 2 9268 2074 (Australia)

**To report a concern to the SunRice Group’s independent Speak Up hotline (toll free):**

**Online:** [sunrice.ethicspoint.com](https://sunrice.ethicspoint.com)  
**Call:** 1800 953 947 (Australia)  
 800 852 3976 (Singapore)  
 833 581 0346 (USA)  
 000 861 271 (PNG)

Scan QR code to make a report



If calling from Vietnam:  
 Step 1: Dial the direct access number for your location: 1 201 0288 or 1 228 0288.  
 Step 2: At the English prompt dial: 833 581 0346.



**We are pleased to present the SunRice Group’s 2024 Modern Slavery Statement. This Statement highlights our ongoing commitment to identifying and addressing modern slavery risks within our operations and supply chains.**

Sustainability is one of the ways in which we create value for our stakeholders, and our commitment to respecting human rights throughout our operations and supply chain is key to achieving our sustainability goals.

Modern slavery is a pervasive global issue affecting millions worldwide. As a global business, we have a responsibility to take steps to address the risks of modern slavery, engage meaningfully with stakeholders and work collaboratively to promote positive change.

In FY24, we navigated a range of challenges to our operating environment, driven by inflationary pressures, increased competition and ongoing supply chain disruptions. We understand that these factors can potentially lead to increased vulnerability of workers within supply chains and heighten the risk of exploitative practices. We therefore remain committed to continuously improving our modern slavery risk management approach, ensuring we stay responsive to any emerging risks. During the reporting period, we progressed the commitments made in our 2023 Modern Slavery Statement including strengthening our policy framework, refining our approach to audits, enhancing our supplier screening, deepening engagement with suppliers, and integrating modern slavery risk management in the development of new products. We also commissioned a review of our Stakeholder Engagement Framework and completed a double materiality assessment.

Consideration of identified material topics, including ‘Responsible Supply Chain and Modern Slavery’, and how these material topics relate to our stakeholders, will form part of our revised approach to sustainability in FY25.

The challenge of eradicating the risk of modern slavery cannot be achieved alone. It requires collaboration between business, governments and civil society. We are therefore proud to be a participant of the United Nations Global Compact (UNGC) since 2018 and the UN Global Compact Network Australia (UNGCA) since 2019, and are guided by the initiative’s Ten Principles including its human rights and labour principles. Through this platform and other forms of multi-stakeholder engagement, we seek to collaborate with key stakeholders across our industry and beyond to deepen our understanding of modern slavery risks, to inform effective strategies and to foster an environment of continuous improvement.

To that end, we remain committed to strengthening our governance approach, investing in training and capability building activities, and enhancing our engagement with our suppliers and other business partners. We look forward to reporting on this progress in our FY25 Statement.

**Laurie Arthur**  
Chair

**Paul Serra**  
Group CEO and  
Managing Director

30 August 2024





# Introduction

The SunRice Group is a global food business and one of Australia's leading branded food exporters. We are committed to respecting the fundamental human rights of the people in our operations supply chains. Our commitment is guided by internationally recognised human rights in the *Universal Declaration of Human Rights* and the core conventions of the International Labour Organization (ILO) including freedom from slavery. We are also working to implement the *UN Guiding Principles on Business and Human Rights* (UNGPs) and continue to evolve the active role we can play in making a meaningful contribution to the *UN Sustainable Development Goals* (SDGs).<sup>2</sup>

According to the Global Slavery Index,<sup>3</sup> there are approximately 50 million people living in modern slavery worldwide including 41,000 people in Australia. Modern slavery is a complex and constantly evolving issue which we monitor to align our approach in response to changes in risks and stakeholder expectations. We also monitor changes in legislative frameworks including the establishment of a federal Anti-Slavery Commissioner in Australia who we look forward to engaging with when appointed.

2. SunRice Group ESG Commitment. Available at: [https://investors.sunrice.com.au/FormBuilder/\\_Resource/\\_module/2weQNICYSUy13FE\\_jxQXvg/file/sustainability-reports/ESG%20Commitment\\_December%202022.pdf](https://investors.sunrice.com.au/FormBuilder/_Resource/_module/2weQNICYSUy13FE_jxQXvg/file/sustainability-reports/ESG%20Commitment_December%202022.pdf)
3. Walk Free. The Global Slavery Index 2023. Available at: <https://www.walkfree.org/global-slavery-index/downloads/>



**Modern slavery is an umbrella term referring to situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, deception and/or abuse of power.<sup>4</sup> The term refers to a range of serious human rights violations, which are also crimes in Australia.<sup>5</sup>**

The forms of modern slavery most relevant to the SunRice Group:

- **Human trafficking:** recruiting, transporting, transferring, harbouring, or receiving individuals through force, fraud, or deception for the purpose of exploitation for profit;<sup>6</sup>
- **Forced labour:** forcing individuals to perform work or services involuntarily under threat of penalty;<sup>7</sup>

- **Debt bondage** (or bonded labour): coercing or compelling an individual to work to repay a debt (such as for recruitment fees) under terms that are unfair or impossible to meet;<sup>8</sup>
- **Slavery:** treating an individual as property, exerting control over them as if they were owned;<sup>9</sup> and
- **Worst forms of child labour:** exploiting children in situations such as slavery, hazardous work, trafficking, debt bondage or forcing children into armed conflict.<sup>10</sup>

Modern slavery exists on the far end of a spectrum that ranges from decent work to serious criminal exploitation.<sup>11</sup> This spectrum highlights the diverse ways in which individuals can be exploited and underscores the importance of identifying and addressing risk factors or early warning signs to prevent escalation.

4. Walk Free. What is Modern Slavery? Available at: <https://www.walkfree.org/what-is-modern-slavery/>.
5. Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. Available at: [https://modernslaveryregister.gov.au/resources/Commonwealth\\_Modern\\_Slavery\\_Act\\_Guidance\\_for\\_Reporting\\_Entities.pdf](https://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf).
6. United Nations Office of Drugs and Crime. Human Trafficking. Available at: <https://www.unodc.org/unodc/en/human-Trafficking/Human-Trafficking.html>.
7. International Labour Organization. Forced Labour Convention, 1930 (No 29). Available at: [https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO::12100:P12100\\_ILO\\_CODE:C029:NO](https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO::12100:P12100_ILO_CODE:C029:NO).
8. Anti-Slavery International. What is Bonded Labour? Available at: <https://www.antislavery.org/slavery-today/bonded-labour/>.
9. Slavery Convention. Geneva, 25 September 1926. Available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/slavery-convention>.
10. International Labour Organization. Worst Forms of Child Labour Convention, 1999 (No 182). Available at: [https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO::P12100\\_ILO\\_CODE:C182](https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO::P12100_ILO_CODE:C182).
11. Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. Available at: [https://modernslaveryregister.gov.au/resources/Commonwealth\\_Modern\\_Slavery\\_Act\\_Guidance\\_for\\_Reporting\\_Entities.pdf](https://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf).



## Our Sustainability framework

**At the SunRice Group, our values drive how we do business, make decisions and partner with those in our supply chain. These values underpin our approach to sustainability and human rights risk management. Our commitments to act with Integrity, contribute to our Community and be Dynamic, Innovative and Collaborative are reflected in our Sustainability Framework.**

We take an intersectional approach to our modern slavery and broader human rights efforts, recognising that human rights are integral to our sustainability work. For example, deforestation for beef grazing and the growing of crops such as soy and palm oil, or the clearing of mangroves for rice production, may create environmental risks as well as displacement and loss of livelihoods for local communities, thereby making people more at risk of exploitation, including modern slavery. These examples highlight our belief in the importance of addressing environmental and social issues holistically.

### Our approach to Sustainability

*Making a difference to the sustainability of places and lives by:*



#### Making a difference to our environment

Minimise the environmental impact of our products from farm to table.



#### Making a difference to our communities

Partner with communities to enrich lives socially and economically, leveraging our expertise wherever we operate.



#### Making a difference with nourishing products

Create nutritious products to improve the lives of consumers.



During the reporting period we undertook a sustainability materiality assessment to identify the sustainability topics most material to the SunRice Group and our stakeholders, and commenced a refresh of our Stakeholder Engagement Framework. We applied the concept of double materiality to consider the SunRice Group's actual and potential impacts on the environment and society along with how these factors affect our financial performance. The process included interviews and focus groups with internal and external stakeholders on a range of issues including modern slavery. The materiality report was finalised at the end of FY24 with 'responsible supply chain and modern slavery' identified as one of our material topics. The results of the materiality review will be used to inform the Group's broader approach to sustainability, including modern slavery, moving forward.

## Our goals and actions

We have established several long-term goals to guide our approach to modern slavery risk management, and provide a roadmap for the impact we aim to make. These include:

- Embed robust governance systems to assess the impact of the SunRice Group's operations on human rights including modern slavery;
- Implement our 3-year social and ethical audit plan for the SunRice Group's owned and controlled sites;
- Minimise the risk of labour rights abuses in our operations and supply chain;
- Build internal capability to identify and remediate issues as they arise; and
- Foster open and trusted supplier relationships to identify and remediate labour rights issues across our supply chain.

Page 7 shows a summary of our progress made in FY24, as well as planned actions for FY25.





## Our commitment to continuous improvement

We are committed to continuously improving our approach to modern slavery risk management. As part of this commitment, we engaged Monash University to benchmark our FY23 *Modern Slavery Statement* against ASX100 and ASX300 companies, and a group of our industry peers and major customers to help us identify opportunities to strengthen our approach to modern slavery risks management and disclosures. The results demonstrated that the SunRice Group's reporting is, overall, above the sector average, but with opportunities for continuous improvement in our supply chain-related disclosures which we have straightened in this Statement.

The diagram to the right shows our key actions from 2016 to 2023.

### Key actions 2016–2024

#### 2016–2018

- Conducted our first supply chain materiality assessment and piloted risk and impact assessment; and
- Aligned the SunRice Group's Code of Conduct with UNGPs and adopted the SunRice Group's first Sustainability Charter.

#### 2019–2021

- Appointed a dedicated Sustainability Manager with a focus on human rights;
- Conducted initial supply chain mapping;
- Developed the Supplier Sustainability Code which was approved by the Board;
- Partnered with LRQA (formally ELEVATE) to conduct supplier risk segmentation;
- Launched the Supplier Sustainability Program (SSP) and commenced internal training and capacity building; and
- Engaged with priority suppliers through Supplier Self-Assessment Questionnaires (SAQs) to better understand their profile and risk management practices.
- Conducted social and ethical audits (using Sedex Members Ethical Audits (SMETA <sup>12</sup>)) of both Sunfoods facilities.

#### 2022–2024

- Conducted a social review of Australian Rice Growers to strengthen our engagement with growers, help deepen their understanding of human rights issues and increase our understanding of the potential human rights-related risks, including modern slavery risks, in our Australian rice supply chain. Based on the findings, our assessment of the risk of modern slavery for the included farms included in the review was low;
- Strengthened our governance approach by elevating the SSP Working Group to a Steering Committee and updating policies and procedures related to labour hire providers and the employment of young workers;<sup>13</sup> and
- Conducted social and ethical audits using SMETA our CopRice Wangaratta site and our Australian Grain Storage (AGS) sites.



12. SMETA is an audit protocol to understand standards of labour, health and safety, environmental performance, and ethics within an organisation's operations or at a supplier site. The SMETA audit is designed to help protect workers from unsafe conditions, overwork, discrimination, low pay and forced labour. More information is available at: <https://www.sedex.com/solutions/smeta-audit/>.

13. For the purposes of this Statement, we have defined young workers as those workers who are of legal working age (noting that this changes between jurisdictions) and under the age of 18.



## Key actions during FY24

During FY24, we continued to develop and strengthen our modern slavery risk management approach. Key actions included the following:

- Implemented a new Group Procurement Policy that incorporates consideration of human rights in purchasing decisions;
- Commissioned a review of the Supplier Sustainability Code including benchmarking against peer practice;
- Established a working group to examine the challenges associated with excessive working hours;
- Commenced the development of guidelines to outline our approach to providing accommodation globally for SunRice Group employees and their families;
- Implemented an audit plan for SunRice Group owned and controlled sites and conducted social and ethical audits (using SMETA) at our Solomon Islands site, Vietnam Mill, SunRice Leeton Mill and our Specialty Rice Food Group (SRFG) plant in Leeton;
- Embedded modern slavery risk identification and assessment into the New Product Development (NPD) process;
- Developed a new SAQ to enhance supplier screening and due diligence;
- Conducted a review and update of our supplier segmentation process; and
- Commenced development of a new internal process to assess human rights-related risks related to entering new countries.



## Planned actions for FY25

In FY25, we aim to:

- Review and strengthen our sustainability governance framework including:
  - Updating our Supplier Sustainability Code;
  - Finalising guidelines for the provision of accommodation globally;
  - Updating our Labour Hire Standards Policy and enhancing our Labour Hire Engagement Procedure; and
  - Considering the development of a Human Rights Statement.
- Review our modern slavery training program following the Government's response to the statutory review of the Act and the review of our sustainability governance framework;
- Release a new e-learning module on forced labour and make this available to our Australian Growers to help improve their understanding of modern slavery risks; and
- Undertake social and ethical audits (using SMETA) of four of our sites: SunRice Deniliquin Mill, CopRice Leeton, Sunfoods California and Sunfoods Hawaii.





# Our structure, operations and supply chain

## Our structure and operations

The SunRice Group is a global food business with a deep Australian heritage, and one of Australia's leading branded food exporters. SunRice was formed in 1950 when a group of rice growers pooled their resources in the Riverina region of NSW to build a single rice mill.

Ricegrowers Limited is a reporting entity under the Act. It was incorporated in Australia and is listed on the Australian Securities Exchange (ASX) (Ricegrowers Limited: SGLLV). The Group has operations across Australia, New Zealand, the Middle East, the United States of America (USA), the Pacific Islands and Asia. The Group's registered office is in Leeton, NSW, Australia.

Riviana Foods Pty Limited is also a reporting entity under the Act. Riviana Foods is a brand-led gourmet food business and is a wholly owned subsidiary of the SunRice Group, which is incorporated in Australia.

The SunRice Group's operations are supported by various functions including Research and Development, People and Culture (P&C), Health, Wellbeing, Safety and Environment (HWSE), Marketing, Sales, Quality, IT, Sustainability, Treasury, Legal and Finance.

A full list of our owned and controlled subsidiaries that are not reporting entities under the Act, but

### SunRice Group country risk rating<sup>14</sup>



whose operations and supply chain form part of the operations and supply chain of the reporting entities, is provided in Appendix 2.

The SunRice Group supports the interests of both A and B Class Shareholders. A Class Shareholders, who must be growers and meet the rice production criteria in our Constitution, are paid for their paddy through our Rice Pool Business, and have control of the company. The Group's B Class Shareholders have the right to receive any dividends generated by our Profit Businesses, and other distributions made by SunRice from time to time. The two shareholder classes, while separate, complement each other, strengthening the alignment between our investors and growers. For more details of the non-standard elements of the company's structure, see our investor website homepage [Investor Relations – Sunrice](#).

### Our objective is to optimise returns for both classes of shareholders

# A

**A Class Shareholders**  
GROWERS

**Australian Rice Pool Business**

Receiveal, milling & selling of Riverina Rice

Revenue – Expenses = Paddy Price

Payments for paddy rice to A Class Shareholders and growers

# B

**B Class Shareholders**  
INVESTORS

**Profit Businesses**

International Rice, Rice Food, Riviana Foods, CopRice & Corporate

Revenue – Expenses = Profit

B Class Shareholders entitled to dividends

Shared costs  
Asset financing charge  
Brand use charges

### Country risk rating

- Low
- Medium
- High
- Extreme
- Global offices and operations

14. EIQ is a third-party, supply chain ESG risk management and due diligence tool owned by LRQA. EIQ calculates country risk using a range of tools and indices including results from audits, the Human Development Index, the Global Slavery Index and other calculations associated with issues such as child labour, forced labour, working hours and wages. Environmental and governance (i.e. Transparency International's Corruption Perception Index) indices are also considered in the rating.



## Our businesses, brands and products

### Australian Rice Pool Business



Our Australian Rice Pool Business is known for supplying premium branded Australian rice. The premium rice featured across our portfolio is grown by rice farmers in the Riverina region of NSW and the Murray Valley in Victoria. Supplying retail, food service, food ingredient, and business customers in Australia, New Zealand, Asia, the Middle East, UK and Europe, our products include pantry staples such as Medium and Long Grain Rice, as well as specialty varieties developed for our Riverina climate, such as Koshihikari Rice, Low GI White and Brown Rice and fragrant Topaz Rice. The Australian Rice Pool Business also participates in premium tender markets selling rice into Japan, Korea and Taiwan.

### Profit Businesses



#### International Rice

Our International Rice business includes our global supply chain and partnerships with international rice growers. This segment also includes any internationally sourced rice sold in Australia.



#### CopRice

CopRice is our animal nutrition business and has a manufacturing footprint across Australia and New Zealand. CopRice's portfolio includes branded products for dogs, cats and the equine and livestock sectors.



#### Rice Food

Our Rice Food business includes a range of rice based products including Microwave Rice, Protein Chips, Mini Bites, Brown Rice Chips, Rice Cakes and Rice Cracker Chips. We also supply rice flour and ingredients to food manufacturers and ingredient customers to create products, including breakfast cereals, gluten free baked goods and rice crackers.

#### Corporate

Our Corporate segment captures the cost of holding and financing assets that are used by our Australian Rice Pool Business and our Profit Businesses. It also includes cross segment charges for the use of SunRice Group brands, and access to our milling and storage assets.



#### Riviana Foods

Riviana Foods is our brand-led gourmet food business specialising in bringing traditional and emerging international flavours, tastes and trends to Australia. Riviana Foods has a portfolio of more than 400 domestic and imported products across multiple food categories for retail and food service customers. Food categories include bakery; chilled desserts; olives, antipasto and traditional pickled vegetables; condiments and sauces; soups and ready meals, fruit (canned); vegetables (canned, frozen and pouch).

## Our brands at a glance

**40+**  
**brands**

(an overview of our brands is provided in Appendix 1)



**A presence in close to**

**50**  
**global markets**





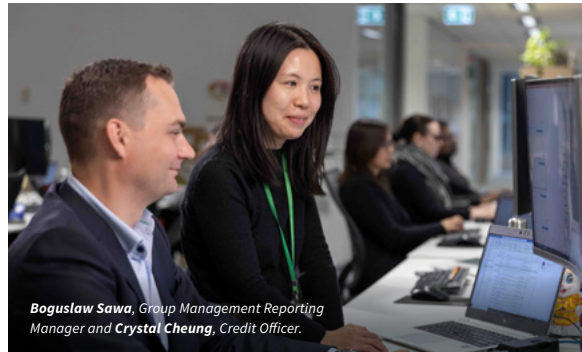


### Our workforce

We employ more than 2,100 people globally (96% permanent full-time; 4% permanent part-time, temporary fixed term or casual). We also we engage temporary or seasonal workers including through labour hire agencies in Australia and the USA. The number of these workers fluctuates during the year but in FY24 they comprised 6% of our total workforce during the Australian harvest time peak. Approximately 50% of our Australian and New Zealand employees are covered by an enterprise bargaining agreement and approximately 75% of our Australian employees are covered by an award.



Michael Baker, Supply Chain Manager and Regan Crockett, Packing Operator.



Baguslaw Sawa, Group Management Reporting Manager and Crystal Cheung, Credit Officer.



Roslindah Mohamed, SunRice Group Office Manager, Bralee Taeng-On, Procurement Category Manager, Packaging and Nur Hazwani Johar, Administration Assistant.



Simon Kohn, Merger and Aquisition Manager and Brianna Parbury, Senior Inhouse Lawyer.

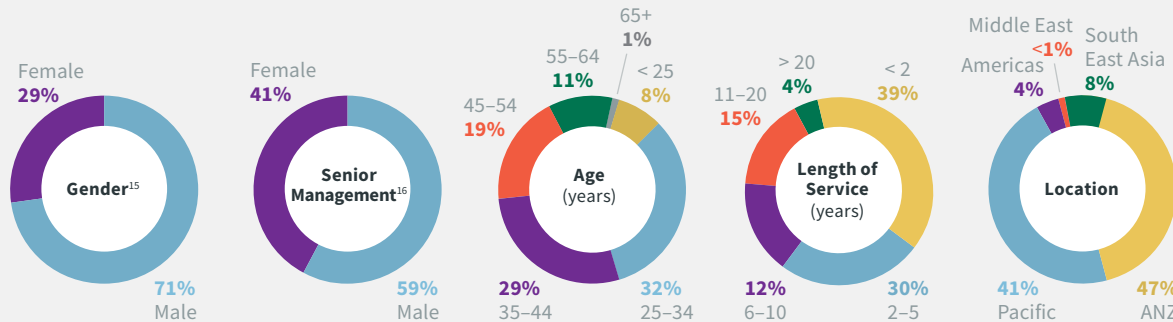


Dennis Dumoi, Sales Merchandiser and Olive Deilata, Sales Merchandiser.



Lam Dong Tung, Agronomy Manager.

### Our global employee base as at 30 April 2024



15. 40% of our employees are based in PNG of which 83% are male. Due to the industry and nature of work in PNG, it is unlikely that the Group will reach gender parity in the near to medium term.

16. Senior Management includes Senior Executives and their direct and indirect reports, who have responsibility for the creation and implementation of long-term strategy, autonomy to operate and/or leadership responsibilities.



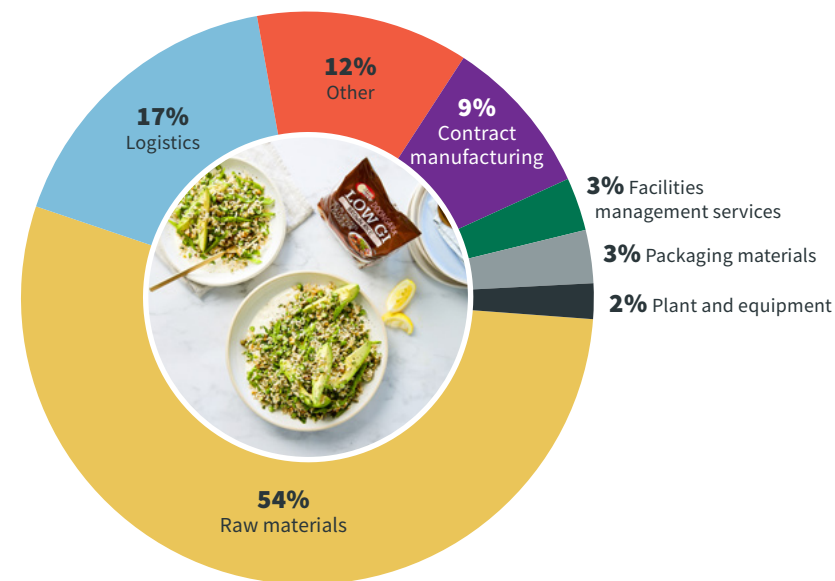
## Our supply chain

We take a multi-origin, multi-market approach to securing a reliable and adaptive global supply chain. We spent approximately A\$1.6b during this reporting period with approximately 5,000 suppliers, with rice comprising our largest procurement category in terms of volume and spend (captured under ‘Raw Materials’ in the Top spend categories pie chart). In FY24, we continued growing our supply chain globally and sourced close to 800,000 paddy tonnes of rice from 12 countries,<sup>17</sup> including Australia, to meet global demand. In addition to rice, other key products and services procured included raw materials (e.g. agricultural products and food ingredients), packaging and manufacturing and logistics services. We have both short and long-term contracts with suppliers depending on the type and nature of the product or service.

Procurement at the SunRice Group is managed by segment-specific procurement teams (Riviana Foods, CopRice and Global Rice, which includes the Australian Rice Pool, International Rice and Rice Food segments) and a central Group procurement function. The Group Procurement team supports the sourcing process for strategic initiatives and categories over a specific spend threshold or categories that are considered critical and/or high-risk across a range of areas including human rights in line with the Group Procurement Policy.

	Top countries by spend <sup>18</sup>		NUMBER OF SUPPLIERS	EIQ RISK RATING
AUSTRALIA	<b>52%</b>	<b>3320</b>		<b>Low</b>
USA	<b>12%</b>	<b>388</b>		<b>Medium</b>
CHINA	<b>10%</b>	<b>16</b>		<b>High</b>
VIETNAM	<b>6%</b>	<b>229</b>		<b>High</b>
THAILAND	<b>5%</b>	<b>15</b>		<b>High</b>
PNG	<b>3%</b>	<b>503</b>		<b>High</b>
ITALY	<b>1%</b>	<b>18</b>		<b>Medium</b>
NEW ZEALAND	<b>1%</b>	<b>165</b>		<b>Low</b>
FRANCE	<b>1%</b>	<b>9</b>		<b>Low</b>
INDIA	<b>1%</b>	<b>7</b>		<b>High</b>

## Top spend categories<sup>19</sup>



17. The SunRice Group's 12 rice sourcing countries in FY24 were Argentina, Australia, Cambodia, China, India, Italy, Pakistan, Taiwan, Thailand, Uruguay, USA and Vietnam.

18. These countries indicate the location of our direct suppliers. We acknowledge that goods and services supplied by our direct suppliers may be (or have components that may be) manufactured or provided in other countries.

19. Raw materials includes rice, wheat, barley, animal fats and oils, seasoning, flavours, minerals, nutrition, supplements, starch; Contract manufacturing includes finished goods such as ready-to-eat rice and jarred fruit and vegetables; Plant and equipment also include maintenance, repairs and operations; Other includes ICT, professional services, travel, entertainment and fleet management, financial service fees and insurance; Facilities management services includes utilities, PPE and cleaning and security; Logistics includes freight and storage; and Packaging includes primary packaging materials.





## Rice value chain

We continually improve our understanding of our supply chain including where the risks of modern slavery may exist. The diagram on the following page (page 13) provides a simplified high-level overview of the key stages in the growing, production, transportation and distribution of rice in Australia. Our international rice value chain differs from our Australian rice value chain.

### International rice value chain

Our international rice value chain varies depending on where the rice is sourced from and by whom. For example, rice may be sourced directly from farms as wet or dry paddy or from agencies, aggregators, drying facilities or rice mills at various stages of rice processing.

While we have long-term relationships with a number of suppliers, our supply chain may vary from year to year depending on supply chain disruptions driven by various factors including climate conditions (e.g. drought or floods) or legislation changes (e.g. trade, import or export related). This variation in our engagement with suppliers creates challenges in mapping our supply chain. To help understand our global supply chain further, during FY24 we commenced a traceability

project focused on our international rice value chain and the associated sustainability-related risks including modern slavery and human rights more broadly. To date, this work has involved engaging with several rice suppliers through a survey to trace the specific location of where rice is sourced from (i.e. the region within the country), the use of social and ethical audits and reviews of how suppliers use contracts in their own value chain. We will continue this work in FY25.





### Australian rice value chain<sup>20</sup>

1

#### Input suppliers

Farmers source a range of materials (e.g. seeds, fertilisers) and production equipment. In Australia, growers are provided with seed by SunRice. Growers sign a pre-delivery declaration which includes a commitment to the Supplier Sustainability Code.

2

#### Rice growing

Prior to planting, growers prepare the land. Seeds are planted using a variety of methods including aerial sowing using an aircraft and/or drill sowing into the ground. Once matured, farmers use grain harvesters to mechanically harvest the rice.

3

#### Storing rice

The rice is dried and stored ready for further processing.

4

#### Rice processing

The rice milling process produces brown and white rice as well as rice by-products (e.g. rice husks, rice bran, broken rice and rice straw).

5

#### Rice packing

Processed rice is packaged into various pack formats, ready for distribution. Types of pack formats include bulk containers, bags and consumer-ready packaging for retail.

6

#### Wholesalers and distributors

How we engage wholesalers and distributors depends on the product, the customer and the customer's location (local/overseas). Rice can also go direct from rice processing to further packing or retail.

7

#### Retail

Rice is sent directly to retailers or re-packed into retail-ready formats and then distributed. Where rice is being used as an ingredient it is sent for further processing (e.g. animal feed).

20. This is intended to provide a high-level overview of key parts of our value chain. Our actual value chain is highly complex and varies across businesses and jurisdictions.





# Identifying and understanding our modern slavery risks

## Understanding how we could be involved in modern slavery risks

The SunRice Group is committed to meeting its responsibility to respect human rights as outlined in the UNGPs. In line with the UNGPs, we understand a company may cause, contribute, or be directly linked to modern slavery in its operations and supply chain. This is known as the continuum of involvement and the Australian Government's guidance on the Act encourages reporting entities to draw on this continuum in identifying, addressing and reporting on modern slavery risks.<sup>21</sup>



Craig Roujet, Hygienist and Samantha Williams-O'Leary, Operator.

We have identified that the SunRice Group is more likely to be directly linked to modern slavery through our suppliers or other business relationships, rather than causing or contributing to it.<sup>22</sup> However, we acknowledge that there are potentially higher risks associated with a number of locations where we operate and source agricultural-based products from. As such, there is a potential risk we might cause or contribute to modern slavery if we do not have adequate controls in place or ignore credible allegations about a business partner, such as a supplier. Where we find instances of modern slavery related risks, we will assess the impact and our actions will be informed by multiple factors, including principles of leverage and remediation as outlined in the UNGPs. For example, where we have strong relationships with strategic suppliers, we are generally in a stronger position to influence change. This is discussed further in our remediation section on page 26.

21. Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. Available at: [https://modernslaveryregister.gov.au/resources/Commonwealth\\_Modern\\_Slavery\\_Act\\_Guidance\\_for\\_Reporting\\_Entities.pdf](https://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf).

22. Under the UNGPs, a company's "business relationships" are understood to include relationships with business partners, entities in its value chain, and any other non-State or State entity directly linked to its business operations, products or services." Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework. Available at [https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf).

## Hypothetical examples of how a company in the food and agriculture sectors may be involved in modern slavery or worker exploitation

### Type of involvement

#### Cause

**A business may cause modern slavery if its own actions or omissions directly result in modern slavery occurring (e.g. a business subjects its workers to serious exploitation such as forced or bonded labour).**

A food processing company directly recruits workers from a neighbouring country to work in its factory. As part of the work contract, the processing company requires the workers to pay an upfront recruitment fee to cover the processing company's administrative costs associated with recruiting migrant workers. As the workers cannot pay this fee upfront, the company deducts the fees from the workers' salaries and charges interest to do so. The debt grows each month and becomes so significant that it will take years to pay off. As security for the debt, the company also holds the passports and work permits for the workers until the debt is repaid.

#### Contribute

**A business may contribute to modern slavery if its actions or omissions facilitate or incentivise modern slavery occurring to the extent that modern slavery would have been unlikely to occur without these actions or omissions.**

**A business could also potentially contribute to modern slavery if it does not undertake appropriate due diligence in relation to its risk areas (e.g. a business' procurement practices).**

A food company places unrealistic expectations on a supplier by negotiating a very low price for a shipment of wheat. The company also places very short deadlines on the supplier for delivery. The only way the order can be met is by the supplier engaging in exploitative practices. As a result, the supplier requires its workers to work excessive unpaid overtime.

A rice mill receives complaints about an agricultural supplier's exploitative practices but does not take action to investigate or seek to use its leverage to address the situation.

#### Directly linked

**A business' operations, products or services may be directly linked to modern slavery through the activities of a third party, such as a supplier. A business may be directly linked, even when it has a modern slavery clause in the supplier's contract and/or has engaged in due diligence (e.g. a business' supplier due diligence practices).**

A pet food company has been engaging in responsible procurement practices including supplier due diligence and includes clauses in its supplier contracts requiring respect for workers' human rights. It procures packaging products from a supplier that exploits workers in producing those goods despite the controls it has in place.



### Our risk identification and assessment process

The SunRice Group has an international network of offices, facilities and operations,<sup>23</sup> and a global network of rice and non-rice suppliers. We rely on a variety of internal and third-party tools to identify and assess the modern slavery risks within our operations and supply chain.

These tools include data and insights from LRQA’s EiQ platform and Sentinel services (a media screening tool), the findings from our social and ethical audits (of our operations) our internal social and ethical questionnaire, supplier screening including SAQs, third party due diligence reports, our Speak Up mechanism, worker engagement, open-source data, multi-stakeholder initiatives such as the UNGC and external expert advice. We have not identified any significant changes to our modern slavery risk profile over FY24.

### Case Study: Development of revised audit plan

Social and ethical audits are one tool that we use to identify and assess our modern slavery risks. During FY24 we developed a revised social and ethical audit plan for SunRice Group’s owned and controlled sites (using SMETA), including developing a tool to assist us to identify sites for audits.

This audit plan tool includes a social and ethical questionnaire which covers issues such as country of operation, workforce composition, shift patterns, the use of labour hire companies, use of contractors (e.g. cleaning or security), and the site’s main activities. This questionnaire was completed by all SunRice Group sites. This data was assessed alongside operational needs, such as customer requirements, to inform the development of an audit plan outlining potential sites for audits over the next three years including timing and the frequency of any follow-ups. The plan has been developed to be a living document which will enable us to pivot, where necessary, to include additional requests from suppliers and/or customers and incorporate any major changes to how our sites operate.

In FY25, aligned with the revised audit plan, we plan to undertake SMETA audits of our Leeton CopRice Mill, SunRice Deniliquin Mill and our SunFoods sites in California and Hawaii.

### Potential risks of modern slavery in our operations

While we have assessed the risk of modern slavery is more significant in our supply chain than in our operations, the nature of the work and the geographic locations where it is conducted means there are some inherent risks in our operations.

#### Labour-related risks

We have assessed the risk of modern slavery in our operations as low due to the controls we have in place. However, our risk assessment process highlights that there are potentially higher risks of modern slavery and other types of labour exploitation among casual and seasonal workers, migrant workers (including those engaged through labour hire agencies), and service-related roles such as cleaning, logistics or security. In addition, casual and temporary workers often have fewer employment protections than those in permanent positions, such as working hour protections, sick pay and safeguards against unfair and unlawful termination. This lack of protections for working hours, combined with job insecurity, may lead workers to accept exploitative conditions, low wages, and poor treatment to maintain an income. For migrant workers, these challenges are further compounded by language barriers, limited understanding of regulatory protections, and visa issues or uncertainties.

The agriculture sector globally relies on temporary labour to meet the demands of seasonal activities such as the sowing and

harvesting of crops. In line with the industry more broadly, the SunRice Group periodically uses labour hire providers to scale up operations in response to business needs and seasonal demands, such as during harvest time. Meeting the heightened demands of seasonal activities may also create risks around excessive working hours, discussed further on page 21.

#### Geographic-related risks

As illustrated on page 8, some of the countries that we operate in, such as PNG and Vietnam, have higher risks of labour exploitation including modern slavery. While some countries have a reported higher risk of modern slavery, no country, including Australia, is immune from the risk of modern slavery.<sup>24</sup>



23. Operational sites include Australian Grain Storage (AGS) facilities, processing sites and manufacturing facilities.

24. Walk Free. The Global Slavery Index 2023. Available at: <https://www.walkfree.org/global-slavery-index/downloads/>.





### Rice sourcing country risk rating<sup>25</sup>

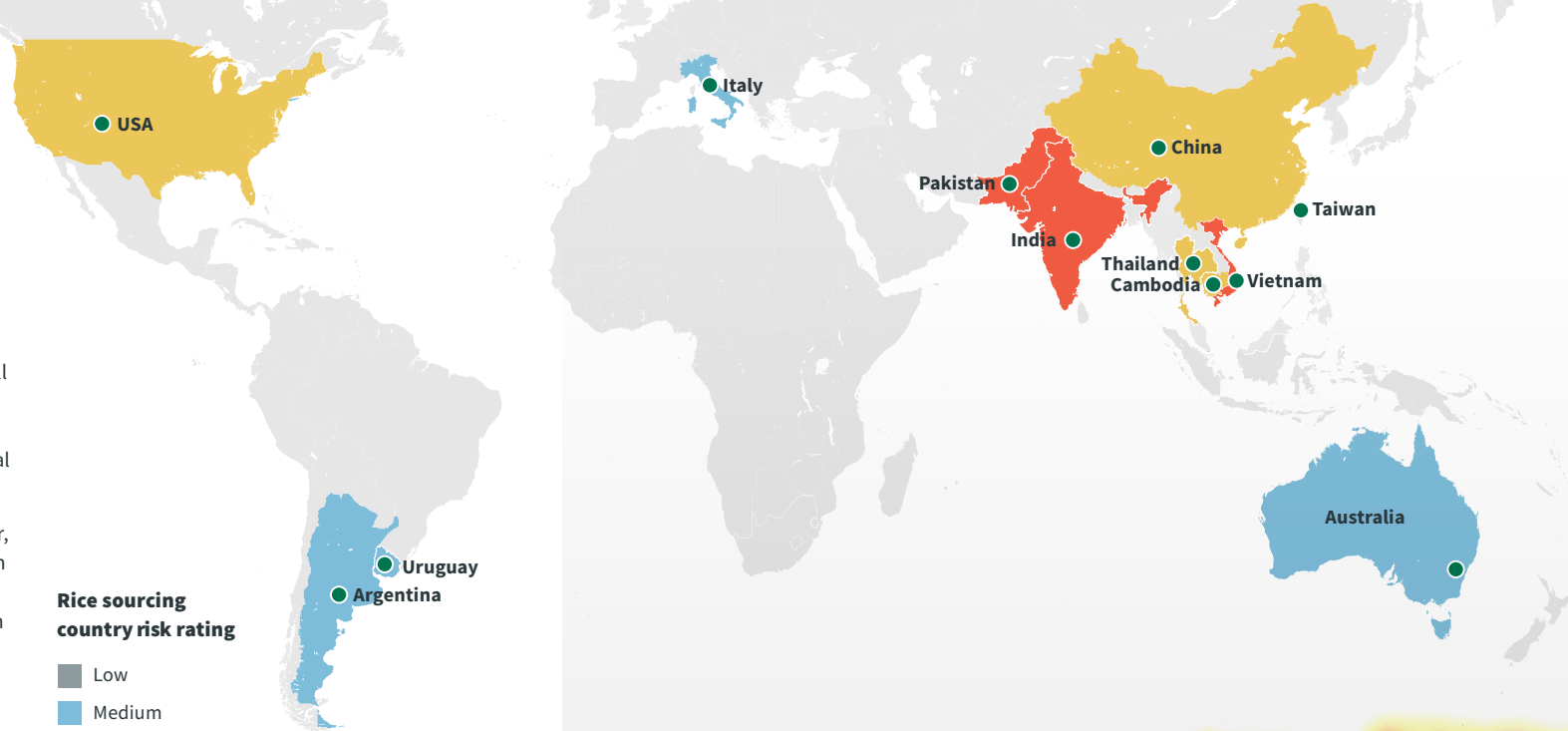
#### Potential risks of modern slavery in our supply chain

Globally, the agriculture sector carries risks of modern slavery. For example, the USA's Department of State acknowledges agriculture as a high-risk sector for forced labour in its 2024 Trafficking in Persons Report.<sup>26</sup> The ILO also reports that agriculture has the fourth highest number of confirmed forced labour cases out of all industries in addition to reports of child labour.<sup>27</sup> There are also multiple reported incidences of child and forced labour in relation to rice in several countries of production.<sup>28</sup>

While the SunRice Group is a significant purchaser, processor and marketer of Australian rice grown in the Riverina region, where approximately 98% of Australia's rice is grown,<sup>29</sup> we also source rice from a diverse range of suppliers located in countries with reported higher risks of modern slavery as shown in the diagram to the right. Additionally, in some instances, our suppliers may procure rice (or rice-products) from another supplier. We are doing work to understand our international rice supply chain, including beyond our direct suppliers (see page 12, for more information).

#### Rice sourcing country risk rating

- Low
- Medium
- High
- Extreme
- Rice supply sources



25. EIQ is a third-party, supply chain ESG risk management and due diligence tool owned by LRQA. EIQ calculates country risk using a range of tools and indices including results from audits, the Human Development Index, the Global Slavery Index and other calculations associated with issues such as child labour, forced labour, working hours and wages. Environmental and governance (i.e. Transparency International's Corruption Perception Index) indices are also considered in the rating.

26. United States Department of State. 2024 Trafficking in Persons Report. Available at: <https://www.state.gov/reports/2024-trafficking-in-persons-report/>.

27. International Labour Organization (ILO), Walk Free and International Organization for Migration (IOM) (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. Available at: <https://www.ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage>.

28. Office of Child Labor, Forced Labor and Human Trafficking, United States Department of Labor. 2022 List of Goods Produced by Child Labor or Forced Labor (2022). Available at: [https://www.dol.gov/sites/dolgov/files/ilab/child\\_labour\\_reports/tda2021/2022-typra-list-of-goods-v3.pdf](https://www.dol.gov/sites/dolgov/files/ilab/child_labour_reports/tda2021/2022-typra-list-of-goods-v3.pdf).

29. Refer to: <https://investors.sunrice.com.au/DownloadFile.axd?file=/Report/ComNews/20190405/02093814.pdf>.



### Goods and services at a higher risk of modern slavery

We have identified several goods and services that could be high-risk for modern slavery, including the most likely potential risks and key risk factors for each category.

#### Rice growing and harvesting

##### Potential modern slavery risks

Forced labour, debt bondage, human trafficking, child labour, deceptive recruitment, underpayment of wages, excessive working hours.

##### Key risk factors

- Reliance on vulnerable or at-risk workers (e.g. lower skilled workers, child labour, migrant workers).
- Use of labour hire companies, with potential risks of misleading and exploitative recruitment practices.
- Pressure to meet seasonal demands, with potential risks of excessive working hours associated with rice growing and harvesting.
- Geographic risks, with rice growing and harvesting often occurring in countries with a higher prevalence of modern slavery.

#### Labour hire companies

##### Potential modern slavery risks

Debt bondage, deceptive recruitment, underpayment of wages.

##### Key risk factors

- Reliance on vulnerable or at-risk workers.
- Risks related to misleading recruitment, identity documentation retention and the charging of recruitment fees (potentially leading to debt bondage).

#### Food processing and manufacturing

(e.g. ready to-eat rice, jarred fruit and vegetables)

##### Potential modern slavery risks

Forced labour, child labour, debt bondage, deceptive recruitment, underpayment of wages, excessive working hours.

##### Key risk factors

- Reliance on vulnerable or at-risk workers.
- Use of labour hire companies, with potential risks of misleading and exploitative recruitment practices.
- Geographic risks, with food processing and manufacturing often occurring in countries with a higher prevalence of modern slavery.

#### Non-rice agricultural produce

(e.g. wheat, barley)

##### Potential modern slavery risks

Forced labour, debt bondage, human trafficking, child labour, deceptive recruitment, underpayment of wages, excessive working hours.

##### Key risk factors

- Use of labour hire companies, with potential risks of misleading and exploitative recruitment practices.
- Pressure to meet seasonal demands, with potential risks of excessive working hours associated with growing and harvesting.
- Geographic risks, with growing and harvesting often occurring in countries with a higher prevalence of modern slavery.

#### Facility management

(e.g. cleaning, security, waste management, repairs and maintenance)

##### Potential modern slavery risks

Debt bondage, deceptive recruitment, underpayment of wages.

##### Key risk factors

- Reliance on vulnerable or at-risk workers.
- Use of labour hire companies, with potential risks of misleading and exploitative recruitment practices.
- Reliance on temporary and casual labour.

#### Shipping and marine transport

##### Potential modern slavery risks

Forced labour, debt bondage, human trafficking, deceptive recruitment, underpayment of wages.

##### Key risk factors

- Reliance on vulnerable or at-risk workers.
- Risk of hazardous work and poor living conditions.
- Limited visibility within shipping, with challenges around gaining access or conducting audits.
- Uncertain regulatory framework as international waters are not governed by national labour laws.

#### PPE and uniforms

##### Potential modern slavery risks

Forced labour, debt bondage, deceptive recruitment, underpayment of wages, excessive working hours.

##### Key risk factors

- Complex and opaque supply chains with potential high-risk inputs such as cotton and rubber.
- Reliance on vulnerable or at-risk workers.
- Geographic risks, with manufacturing and extraction of raw materials often occurring in countries with higher prevalence of modern slavery.

#### Solar panels<sup>30</sup>

##### Potential modern slavery risks

Forced labour, debt bondage, child labour, human trafficking, deceptive recruitment, underpayment of wages.

##### Key risk factors

- Complex and opaque supply chains with potential high-risk inputs such as polysilicon.
- Reliance on vulnerable or at-risk workers.
- Geographic risks, with manufacturing and extraction of raw materials often occurring in countries with higher prevalence of modern slavery.

#### Plant and equipment

##### Potential modern slavery risks

Forced labour, debt bondage, human trafficking, deceptive recruitment, underpayment of wages.

##### Key risk factors

- Complex and opaque supply chains with potential high-risk inputs such as steel and electronics.
- Reliance on vulnerable or at-risk workers.
- Geographic risks, with manufacturing and extraction of raw materials often occurring in countries with a higher prevalence of modern slavery.

30. There was no spend on solar panels during the reporting period, however, as outlined on page 24 we have continued our due diligence on solar suppliers in anticipation of any future investments.



# Assessing and addressing our modern slavery risks

## Governance

Our governance framework is crucial in supporting our approach to sustainability, including our modern slavery risk management approach.

Our Sustainability Framework includes our Supplier Sustainability Program (SSP), which provides a framework for managing human rights including modern slavery risks throughout the SunRice Group's operations and supply chain. It comprises a range of policies (including our Supplier Sustainability Code) and other activities to support sustainable practices. The SSP Steering Committee, a cross functional body with representatives from across the SunRice Group, has oversight of the SSP.

One of our priorities for the coming year is to review our sustainability governance framework, including for human rights issues. This will include revising the terms of reference of the SSP Steering Committee to update the SSP's responsibilities. Additionally, we are in the process of appointing a Sustainability Reporting and Governance Manager with responsibility for establishing and managing governance systems to support the delivery of our sustainability objectives including related to modern slavery.



## Governance of modern slavery risks at the SunRice Group

<b>SunRice Board</b>	Responsible for overseeing and monitoring the effectiveness of the Group's sustainability performance and of the Group's systems and processes for legal and regulatory compliance, including with the Act.
<b>Safety, Health and Sustainability (SHS) Committee</b>	Oversight and guidance, on behalf of the SunRice Board, on the Group's compliance with, and disclosure against, internal and external health, safety and sustainability laws, regulations, standards and commitments. The SHS Committee meets quarterly.
<b>SunRice Group CEO Corporate Management Team (CMT)</b>	Oversight and monitoring of the implementation of the health, safety and sustainability strategies and compliance framework across the Group's operations including, for sustainability, the Group's supply chain.
<b>Supplier Sustainability Program (SSP) Steering Committee</b>	Responsible for the identification of and decision-making for modern slavery risks across our operations and supply chain, including advising on supplier issues as they arise and identifying any issues that should be escalated to the SHS Committee or the SunRice Board. Meets every six to eight weeks, or more frequently if required.  <b>Membership includes:</b> General Counsel and Company Secretary Chief People Officer Group Head of Finance and Risk Group Head of Sustainability Group Head of Health, Wellbeing, Safety and Environment Group Head of Procurement Head of Global Supply Chain and Manufacturing Head of Operations, CopRice Head of Agribusiness Head of International Sourcing, Global Rice Head of Research and Development, Global Rice Chief Financial Officer, Riviana Foods Sustainability Manager, Human Rights
<b>Sustainability Team</b>	Responsible for defining and implementing the sustainability strategy, including the Group's approach to human rights risk management (including modern slavery). The Team also provides guidance in matters relating to human rights.

## Corporate Management Team (CMT)

**Paul Serra**  
Group CEO and Managing Director

**Dimitri Courtelis**  
Chief Financial Officer

**Kate Cooper**  
General Counsel and Company Secretary

**Stephen Forde**  
Chief Executive Officer, Riviana Foods Pty Ltd

**Ganesh Kashyap**  
General Manager, CopRice

**Belinda Tumbers**  
Chief Executive Officer, Global Rice

**Vesna Garnett**  
Chief People Officer

**Alan Preston**  
Chief Executive Officer, Trukai Industries Limited

## Policies

We have a number of policies that are relevant to managing modern slavery risks, as listed to the right. These are endorsed or approved by the CMT and, where appropriate, approved by the SunRice Board. These policies are part of our broader governance framework which includes a range of other policies including our Health, Wellbeing, Safety and Environment Policy, Anti-Bribery and Corruption (ABC) Policy, External Parties Policy and Risk Management Policy.

We are committed to continually improving these policies to ensure they remain fit for purpose and recognise we must continue to improve the awareness and adoption of our policies across the Group to ensure consistency in our approach. In addition to the policies in the table to the right, during the reporting period we commenced the development of Global Accommodation Guidelines to outline our approach to providing accommodation for SunRice Group employees and their families. We are also committed to reviewing our Labour Rights Standards Policy and updating our Labour Hire Engagement Procedure in FY25. The aim is to provide clarity on roles and responsibilities of the SunRice Group and our labour hire providers in critical areas such as grievance management, payment of workers, accommodation, eligibility to work and completion of safety training.

### SunRice Group Code of Conduct

**Relevance to modern slavery**  
Defines our standards, values, and behaviours in terms of how we operate as a business, including our commitment to the UNGPs. It places expectation on employees, suppliers and their sub-tier suppliers to respect all human rights, including labour rights, throughout their business activities. Specifically, it confirms that the use of child labour is not tolerated.

**Implementation**  
Our employees receive mandatory training on the Code of Conduct as part of their induction training. The training is required to be completed every two years. Information related to the Code of Conduct is also included in the Group’s employee booklet provided as part of our induction process.

### SunRice Group Speak Up Policy

**Relevance to modern slavery**  
Governs our whistleblower mechanism and processes, and clearly defines our investigation and escalation processes. Human rights-related concerns, including those related to modern slavery, can be raised through the Speak Up channels by a range of persons including employees, contractors, supply chain workers and those who come into contact with our operations.

**Implementation**  
This Policy is available in English, Vietnamese, Arabic, and Pidgin on our website. Our internal Speak Up Ambassadors (located in Vietnam and PNG) receive specific training on ABC and then deliver Speak Up training to those employees who do not have access to computers, or who need support in local language. The Ambassadors also promote the Policy, and make themselves readily available to employees, to provide workers with an option of raising issues with a trusted internal representative.

Information related to the Speak Up Policy is included in the SunRice Group’s employee booklet that is provided to employees as part of our induction process.

### SunRice Group Labour Rights Standards Policy

**Relevance to modern slavery**  
Outlines our adherence and commitment to the ILO Core Conventions, including the Forced Labour Convention, 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105). Specific focus is placed on freedom of association, forced labour and human trafficking, child labour, working hours, wages and benefits, servitude, diversity and inclusion.

**Implementation**  
The expectations outlined in our Labour Rights Standards Policy are included as a key component of the training associated with the Code of Conduct, the Supplier Sustainability Code and the Group’s mandatory modern slavery training.

Any employees, former-employees, contractors or supply chain workers can make a report including in relation to labour rights through Speak Up.

The Policy will be reviewed in FY25 as part of our standard review process.

### Group Procurement Policy (internal)

**Relevance to modern slavery**  
Outlines the principles and policies to be adopted by the SunRice Group as part of the procurement process and includes specific expectations related to modern slavery (e.g. no use of child labour and zero tolerance for modern slavery and human trafficking, including forced, bonded, or involuntary labour). It includes a procurement risk assessment guide which considers human rights issues including modern slavery.

**Implementation**  
The Group Procurement Policy was updated during the reporting period to strengthen our Group-wide approach to supply chain risk management and provide greater consistency across the business. It was approved by the CMT and shared across the SunRice Group. Education sessions on the Policy have started with additional activities planned for FY25.

### SunRice Group Supplier Sustainability Code

**Relevance to modern slavery**  
Outlines our standards and expectations of business practice for suppliers across the SunRice Group, and includes provisions around preventing forced labour practices and exploitation within our supply chain.

**Implementation**  
Our Supplier Sustainability Code is available on our website in English, Vietnamese and Chinese. Targeted training is conducted with key business functions. Clauses referring to the Supplier Sustainability Code are included in most of our contracts to outline our expectations to our suppliers and support compliance with our Code.

A review of the Code commenced in FY24 to assess alignment with international standards, including the UNGPs, peer practice and with the aim to provide a more streamlined document for our suppliers. The Code will be updated in FY25.

### ESG Commitment

**Relevance to modern slavery**  
Sets out our Group-wide commitment to the environment, communities and consumers. It includes our commitment to the UNGPs and reaffirms our expectation of our business, employees and suppliers to respect all human rights, including labour rights, throughout our operations and supply chain.

**Implementation**  
Our ESG Commitment is referenced in a number of our documents including the SunRice Group Code of Conduct, Supplier Sustainability Code and the Labour Rights Standards Policy.

### Grievance Policy (internal and Australia only)

**Relevance to modern slavery**  
Outlines how the SunRice Group addresses workplace grievances, aiming for a harmonious environment by resolving conflicts promptly and fairly. It defines the steps for raising grievances, outlines the resolution process, and highlights confidentiality and accountability. This policy applies to employees only.

**Implementation**  
The Grievance Policy is made available to employees via the internal intranet. The Policy will be reviewed in FY25 as part of our standard review process.



## Operational risk management

We seek to mitigate our operational risks through a range of policies and processes that govern our approach to recruitment and employment arrangements including our Code of Conduct and Labour Rights Standards Policy (outlined on page 19). Other controls include mandatory training for employees on modern slavery, an accessible grievance mechanism and dedicated ambassadors in some offshore locations to promote reporting channels and manage additional geographical risk (discussed further on pages 26–27).

During FY24, we continued to deploy an audit program for our own sites, with SMETA audits conducted across four of our operational sites.



31. The ETI Base Code is founded on the conventions of the International Labour Organization (ILO) and is an internationally recognised code of labour practice. Available at: <https://www.ethicaltrade.org/eti-base-code>.

32. This aspect was not specifically reviewed in the Australian audits.

### Case study: Audit process and findings

Social audits were conducted by independent third parties at our site in Solomon Islands, and at our Vietnam Mill, SunRice Leeton Mill and Leeton SRFG facility. The audits used the SMETA four pillar methodology, which assesses practices against Labour Standards, Environmental Ethics, Health and Safety and Business Ethics. The process is conducted by a SMETA approved auditor and is designed to identify risks to workers related to unsafe working conditions, overwork, discrimination, underpayment and forced labour. The audit process includes a site tour and interviews with workers.

#### Process

Leading up to the audits, the Sustainability Team worked closely with a group of leaders including site leads, P&C Business Partners and HWSE representatives to enhance understanding of the SMETA audit protocol, including the SMETA SAQ, and how the site would be assessed. “Toolbox Talks” were held with the broader site team to help prepare them for the audit process and inform them of what to expect. This was also used as an opportunity to deliver training on the Ethical Trading Initiative (ETI) Base Code<sup>31</sup> and the SunRice Group’s Speak Up mechanism. For more information on the training, see page 25.

#### Findings

The audits highlighted some strengths and areas for improvement. Non-attributable feedback from worker interviews highlighted that our workers are receiving the appropriate (and in some cases, above their) entitlements and that they felt respected in the workplace. The audits in Vietnam and Solomon Islands also reported that workers are receiving wages and benefits above the legal minimum requirements.<sup>32</sup> Other examples of benefits observed in Solomon Islands included free transportation for workers to and from work, provision of daily lunches, an allowance for medical assistance and an education allowance. In the area of labour rights, the audits revealed areas for improvement in Vietnam and Solomon Islands, particularly regarding record keeping and payslips and managing periods of overtime (although no modern slavery-related issues were identified). No issues related to labour rights were identified through the two Leeton audits.

#### Post audit support and next steps

Following the audits, regular meetings with a cross-functional team for each site were set up to create a corrective action plan to address non-compliances and findings raised. Non-compliances relating to written and understandable information in respect to wages under the ETI Base Code in Solomon Islands were closed out promptly through the implementation of new processes and systems.

A corrective action plan is in place to address findings from the Vietnam Mill audit. As this audit occurred in April 2024 (the last month of the reporting period), close out will occur during the next reporting period with verification taking place via a follow up audit.

The outcomes of these audits and the progress of actions taken to address non-compliances were discussed at the SSP Steering Committee meetings and were reported to the CMT and both the SHS and Finance, Risk and Audit (FRAC) Committees of the SunRice Board.

#### Key reflections

The audit process provided opportunities to identify areas for continuous improvement and build capacity across our operational sites and Group functions. It also strengthened engagement across the Group on a range of sustainability issues, including human rights. For example, by integrating ETI Base Code Training as part of the audit process, we were able to build the knowledge and awareness of workers across sites on labour rights including modern slavery. As we rolled out the audits across the sites, we also observed knowledge sharing between operational sites, and built stronger relationships between sites and Group functions that have extended beyond the audits themselves. Site leads also found the audit provided a useful mechanism to hear directly from workers on what was working well and where improvements needed to be made.

**New country screening**

Prior to entering or sourcing from a new country (for example, for the purposes of sourcing rice, establishing new operations associated with rice (i.e. milling), or partnering with processing companies with an existing presence), the SunRice Group conducts a risk assessment to identify, evaluate and mitigate a range of risks including governance, economic, environmental and human rights risks. A cross-section of representatives from key functions is included in the risk assessment and decision-making process, including International Sourcing, Quality, Sustainability, Logistics and Transport, Risk, Treasury and Legal.

During FY24, we started developing internal guidelines to formalise and inform our country entry screening process, including in relation to identifying and assessing human rights-related risks. As we further develop the guidelines, we will include considerations for supplier and/or business partner risk and the triggers that require further due diligence and critical issues that may



Hon Dat district, Ken Giang province, Vietnam.

result in an immediate termination of discussions with the intended supplier or partner. We have been testing the draft guidelines as part of our country and supplier due diligence related to a new country, which provides an opportunity to assess their practical application and incorporate updates before finalising and expanding their implementation.

**Mitigating risks associated with mergers and acquisitions (M&A)**

The SunRice Group continues to expand in key markets and into new product categories through strategic acquisitions. During the reporting year, the Group engaged in formal processes to acquire food businesses. Environmental and social, including human rights, due diligence was undertaken as part of the overall due diligence process associated with the potential acquisitions. This due diligence included reviewing the ingredients sourced by the particular businesses and assessing the businesses' operational profiles for human rights risks.

**Mitigating risks associated with working hours**

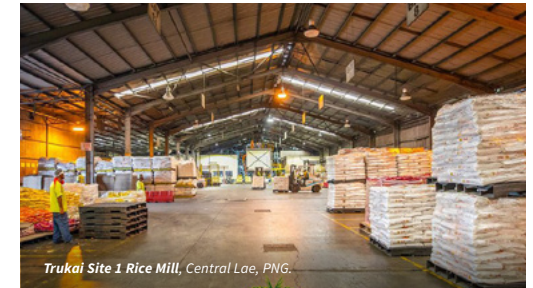
The seasonal nature of agricultural work often creates risks regarding working hours, particularly during harvest seasons. For the SunRice Group this risk occurs seasonally during Australia's rice harvest across our AGS facilities where we have an increase in labour hour requirements to fulfill the delivering and processing of paddy. Alongside the challenges posed by a harvest period, we are also navigating other challenges, particularly in

the Riverina region of NSW. For example, there is a shortage of labour to support the additional workload associated with the receival and drying of rice paddy at AGS. Concurrently, we have also witnessed seasonal workers seeking to work additional hours to maximise their income during harvest period and opting to work elsewhere if the desired hours are not available. Given this dynamic and complex operating environment, we continue to monitor risks related to excessive working hours across our business. During the reporting period, we established a working group to better understand these issues. This work will continue in FY25 including the scoping of any updates to policies or further guidance that is needed.

In preparing for the Australian harvest season, a risk assessment was conducted of the AGS operations to identify potential safety, health and environmental risks to workers and evaluate whether any additional controls may be needed. This assessment included considering risks associated with long hours or consecutive workdays. We have a number of controls in place to assess fatigue and ensure break days are taken if workers are experiencing fatigue. In FY25, we will conduct a post-operational harvest review to determine the effectiveness of controls outlined in this harvest risk assessment.

**Mitigating risks associated with labour hire providers**

In FY22, following an internal review, we started developing a new procedure to ensure labour hire companies meet our criteria prior to being approved



Trukai Site 1 Rice Mill, Central Lae, PNG.

to work with the SunRice Group. The Labour Hire Engagement Procedure provides an overview of the steps required for onboarding, compliance, and ongoing engagement, aligning with codes of practice and legal requirements. We have contracts in place with the majority of labour hire companies that we engage (with some currently under review), which include warranties to ensure that each worker has the appropriate skills, training, and qualifications, has the legal right to work in Australia, and will undergo any training requested by SunRice Group. We also have specific clauses related to modern slavery in these agreements.

**Mitigating risks associated with younger workers**

We have processes in place to ensure risks related to younger workers are addressed in our operations. These are included in our Child Labour Remediation Guideline which outlines our commitment to global labour standards, prohibits underage hiring, and provides guidance on actions to remediate child labour. To help reduce the risk of child labour from occurring, we screen individuals upon job application to check that they are of legal working age. Prior to an offer of employment, age checks are conducted by a third party. We intend to review our controls and measures to ensure the safety of younger workers of legal working age are appropriately considered.

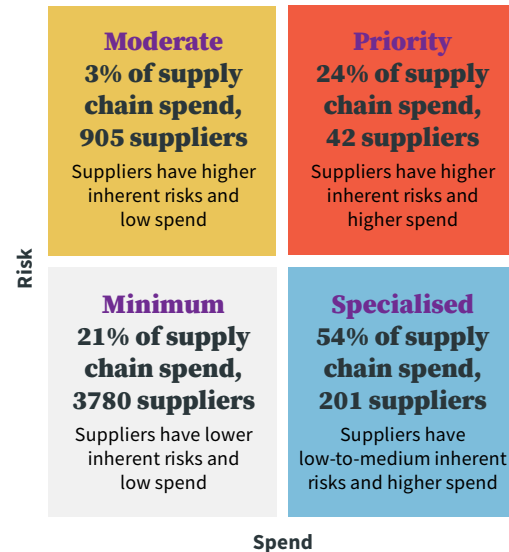


### Supplier segmentation

During the reporting period, we reviewed and updated our supplier segmentation. To assist with this process, work was undertaken to improve supplier data quality across the business, including analysing data and categorising suppliers according to the goods and services that they provide to the Group and overlaying this with supplier spend.

Our supplier risk assessment methodology categorises suppliers into four segments based on the inherent risk of the supplier, including modern slavery-related risks. We use the EiQ platform to assess suppliers, inherent modern slavery risks considering geography, sector, product, services and labour related risks. The segmentation process also includes consideration of the potential influence the SunRice Group has with our suppliers based on our level of spend. We acknowledge that supplier spend with a supplier is only one indicator of the leverage we may have to influence change. Other factors include the nature and length of engagement and market dynamics (e.g. number of suppliers that offer a certain good or service). These other factors will be assessed further as we deep dive into our priority categories. Understanding leverage enables us to prioritise our efforts in terms of where we can make the most impact. We will continue to evolve our approach to supplier segmentation and supplier screening over time.

### Overview of supplier segmentation<sup>33</sup>



### Supplier screening

We conduct initial due diligence on all new suppliers using an online tool that screens for politically exposed persons, state owned entities, regulatory and law enforcement, adverse media and if the relevant person or entity is subject to sanctions. In line with our External Parties Policy, if the initial due diligence identifies any issues of concern, more detailed due diligence may be carried out.

We use EiQ to undertake a risk assessment of high-risk suppliers based on the supplier segmentation process and screening process as shown below. Our process, set out on the right, will be reviewed following a number of category deep dives that we have commenced.

During FY24 we developed a new supplier SAQ to align with the ETI Base Code and reflect material topics such as deforestation. We initially rolled this out to several suppliers across priority categories (i.e. rice, co-manufacturing facilities and solar panel providers). Where social and ethical audit reports were available, they were reviewed in parallel to the SAQ. Based on the results of this review, we determine whether deeper due diligence is required including follow-up engagement with the supplier.

<sup>33</sup> Percentage refers to the percentage our supply chain spend that sits in the specific quadrant. We use the EiQ platform to assess the suppliers inherent modern slavery risks considering geography, sector, product, services and labour related risks.

### New priority suppliers

The majority of new priority suppliers (i.e. high-risk based on supplier segmentation) go through a screening process. Screening may occur through procurement or as part of our New Product Development (NPD) process (see, page 23).

Conduct initial due diligence via online tool.

Priority suppliers are required to provide additional information on their risk management practices (including in relation to modern slavery) through an SAQ. If issues or areas of concern arise, an audit will be requested.

Contract clauses requiring the supplier to adhere to the Supplier Sustainability Code are included in the majority of contracts.

### Existing priority suppliers

Priority suppliers are reviewed on an ongoing basis and an SAQ may be requested or an audit if any red flags are identified. We also review existing audit reports through SEDEX or audit reports provided to us by suppliers.

### Suppliers that remain high-risk post screening

Decisions regarding suppliers that remain high or extreme risk after detailed risk assessment, and suppliers that do not engage with us regarding their modern slavery practices, are escalated to our CMT, SHS Committee and if necessary, the SunRice Group Board.

We will continue to expand the number of suppliers that receive the SAQ across our identified higher risk categories with the goal of broadening our approach across our supplier base. Our ongoing due diligence and engagement with suppliers, including in relation to increasing our suppliers' understanding of modern slavery risks will be an area of focus in FY25, particularly for rice suppliers and co-manufacturers.

### Case Study: Supplier screening

During the reporting period an existing supplier was asked to complete an SAQ as part of the supplier due diligence process for New Product Development (NPD). The SAQ response enabled us to identify potential areas of risk which prompted deeper engagement with the supplier to further understand their risk profile and risk management approach. Through this process, the supplier shared that one of their ingredients was being sourced from a country with reported high human rights risks including modern slavery. We also learnt that there was no assurance of due diligence being conducted by our suppliers' supplier to manage this risk. Following ongoing engagement, we explored alternative sourcing options with our supplier and opted to source the ingredients (via the supplier) from an alternate source in a country with a lower risk profile. Although this resulted in an increase to the project cost, the SunRice Group was satisfied that, in this instance it was the appropriate approach to managing the modern slavery risk based on the information available. As a result of this engagement, the supplier advised that they were planning to incorporate sustainability into their strategy



moving forward, and we have also added additional terms to our contract with the supplier concerning supply chain due diligence.

#### Key reflections

Our engagement was well received by the supplier with feedback that it provided them with the opportunity to enhance their knowledge and capacity, particularly in relation to due diligence processes. The collaborative approach encouraged an open dialogue with our supplier and demonstrated the benefit of combining SAQs with direct supplier engagement to understand the operating context and agree on a path forward.

The process also helped to increase our internal capability on supply chain risks and due diligence within our internal teams, particularly in relation to how we can address supplier risks that are further down our supply chain. We recognise that this is an area for deeper exploration particularly where our suppliers source materials, including ingredients, on our behalf.

### Case Study: Embedding modern slavery risk identification and assessment into NPD

In 2024, our Global Rice Research and Development Team invested in integrated IT systems, addressing Product Lifecycle Management and Project Management. This offered an opportunity to further integrate the Sustainability Team into the NPD process through the provision of guidance on sustainability-related expectations of suppliers including related to modern slavery.

To support this process, checklists setting out key considerations (including modern slavery risk factors) were created for relevant stages of the product development process and continue to be refined as we learn from putting them into practice. As part of the approval process to proceed to the next stage of development, the Sustainability Team also undertakes a sustainability risk assessment and, where required, due diligence, including in relation to modern slavery, and provides advice on mitigating any identified risks. The level of risk associated with the supplier will inform the steps taken which may include further



due diligence, collaboration on risk mitigation strategies with a supplier and/or escalation to SSP or CMT for further consideration.

We have also been working on a new product specification system which includes an automated process to assess new and existing suppliers on sustainability issues including modern slavery. Roll-out commenced outside of the reporting period and further details will be provided in our FY25 Statement.

#### Key reflections

Providing a process for structured engagement between the Sustainability Team and cross-functional project teams has allowed for the identification of modern slavery risks early in the NPD process and streamlining of due diligence processes across the business. The early and ongoing engagement has also resulted in increased capacity across internal teams to recognise potential human rights risks including related to modern slavery.





SunFoods, Woodland, California.

### Case study: Due diligence on solar panel suppliers

In our FY23 Modern Slavery Statement, we reported on the supplier due diligence undertaken for our solar project at our SunFoods site in Woodland, California. In FY24 more than 2,500 individual solar panels were installed across three different solar energy systems at the site. Although we did not have any solar panel-related spend during FY24, we anticipate potential future investments in this area in line with the Group's commitment to having 100% renewable electricity by 2030 and to be Net Zero by 2050. In line with our 2023 commitment to deepen due diligence processes in relation to the purchase of solar panels, we have been conducting due diligence on potential suppliers, informed by desk-based research and targeted screening. To aid this process, we developed tailored SAQs: one for solar providers and another for inverter providers. The SAQs included a comprehensive set of questions about the supplier's operations and supply chain, such

as countries of operation, workforce composition, use of labour hire providers and supplier locations. They also included the supplier's human rights risk management strategies across the value chain, with a particular focus on forced labour, and questions about the provision of grievance mechanisms. We have been engaging with several suppliers across multiple jurisdictions regarding their responses to better understand their policies and controls, and will continue to do so before making a selection.

#### Key reflections

Our due diligence on solar panels and inverters has demonstrated the challenge of understanding the risks associated with complex and opaque supply chains, particularly where the risks may exist deeper in the supply chain (i.e. the sourcing of raw materials to manufacture the panels). Responses received to date to the SAQs have varied significantly, revealing substantial differences in the maturity levels of different suppliers. This underscores the value of using a tailored questionnaire to address specific issues within a sector.

### Case study: Engaging with our suppliers on audit findings

During the reporting period we identified, through social and ethical audits, the charging of recruitment fees by two suppliers based in South East Asia. One of the two suppliers directly charged recruitment fees to its migrant workers, whilst the other supplier used a labour hire provider that was charging recruitment fees and holding the work permits of migrant workers who were working at our supplier's factory.

Once the issue was identified, our Sustainability Team engaged with each supplier, including the business owners and key senior staff, to further understand the situation and determine the necessary measures required to address the issues. We also offered support to both suppliers in the form of capacity-building activities, such as training on human rights including modern slavery and/or on the ETI Base Code, to help them understand our expectations and key international standards and frameworks.

Through our engagement, we identified that the supplier that had been charging recruitment fees directly had already been addressing the issue over time, including reimbursing recruitment fees. A follow-up audit report confirmed that the appropriate measures were in place to ensure workers would no longer be required to pay recruitment fees, and that workers who had paid them had been reimbursed.

Ongoing engagement with the other supplier continues, including working with them directly to develop a corrective action plan. This plan includes working with their labour hire provider to outline expectations regarding minimum

labour standards and follow-up discussions with our Sustainability Team to discuss progress and identify any additional challenges. A follow-up audit has also been conducted (we are awaiting the audit report at the time of drafting this Statement).

These matters were discussed at the SSP Steering Committee meetings and were reported to the CMT and the SHS and FRAC Committees of the Board.

#### Key reflections

Our engagement with these suppliers has highlighted some of the challenges in addressing supply chain risks. For example, recruitment fees are legal in the jurisdiction in which the relevant suppliers operate, which made communicating the need to change practices more complex. As such, we had to help build both suppliers' understanding around the differences between our expectations which align with international standards (such as the ETI Base Code) and domestic legal requirements.

We found that the supplier that had more experience with international retailers had more fluency in the area of labour rights standards, which led to a more open dialogue and faster outcomes, including the repayment of recruitment fees. With the other supplier, we encountered some language barriers, which made engagement more challenging. This will require us to consider additional translation support as we continue to engage our suppliers on sustainability priorities across our international supply chain.

While audits are only one tool within our broader due diligence approach, and have limitations, this experience underscored the value that conducting independent audits can provide.

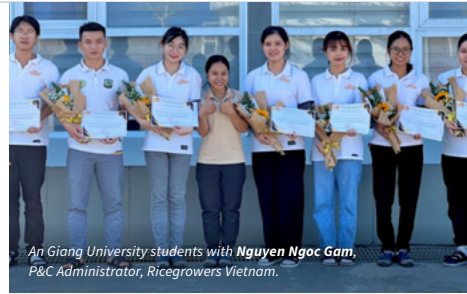
# Training

Building the capacity of our team to identify and address modern slavery risks is crucial to the success of our modern slavery strategy. Through our training modules we aim to help employees understand SunRice Group’s expectations and how these expectations relate to their roles and responsibilities, and support the goal of embedding our commitment throughout the business. Based on the outcomes of the Government’s response to the independent review of the Act, we will look to update our modern slavery-related training. We will also roll out forced labour training modules to some segments of our suppliers.

## Case study: ETI Base Code training for workers at operational sites during audit process

Our Sustainability Team, in partnership with the on-site operational teams, used the site audits in Solomon Islands, Vietnam and Leeton, NSW as an opportunity to deliver training on the ETI Base Code. ETI Base Code training was provided to workers at these sites ahead of each audit. This training was delivered face-to-face using interpreters where required. In Vietnam, participants also received a copy of the ETI Base Code in Vietnamese.

The training took participants through the nine key principles of the ETI Base Code and what they could expect in the workplace, providing practical examples to illustrate each principle. The training also explained the audit process and explained that workers should feel free to speak openly and that their information would be kept confidential.



An Giang University students with **Nguyen Ngoc Gam**, P&C Administrator, Ricegrowers Vietnam.

## eLearning modules

### Our Approach to Sustainability: Recognising the risks of Modern Slavery

This module provides an overview of modern slavery including its prevalence, indicators and key risks for our business. The training also provides information on the requirements of the Act, and how to raise concerns. This module is mandatory for all permanent employees and must be completed every two years.

**93%** compliant in FY24<sup>34</sup>  
(based on those that it was issued to)

### Our Approach to Sustainability: Supplier Sustainability Code

This module covers key elements of the Supplier Sustainability Code (including modern slavery), SunRice Group’s Speak Up Policy, and the expectations and responsibilities of suppliers and SunRice Group. Specific staff in Global Sourcing, Accounts Payable and Legal, as well as business unit staff in procurement, quality, and research and development are required to undertake Supplier Sustainability Code training every two years.

**93%** compliant in FY24<sup>34</sup>  
(based on those that it was issued to)

<sup>34</sup> These training modules are required to be completed every two years by relevant employees. The % of employees that are compliant refers to employees that were due to complete the module and have completed and passed the module as at 30 April 2024.

## Collaboration and engagement

Throughout the reporting period, we have participated in several forms of collaboration and engagement.

Engagement	Key stakeholders	Overview
<b>UNGCNA Modern Slavery Community of Practice (MSCoP)</b>	Business and other stakeholders including civil society and government	Engagement in the MSCoP has provided a space to learn and discuss opportunities and challenges relating to modern slavery and share leading interventions to improve approaches to modern slavery risk management.
<b>UNGCNA 2023 Annual Dialogue on Business and Human Rights</b>	Multi-stakeholder	Participation in the Dialogue provided insights into emerging human rights risks and challenges including related to modern slavery. It also assisted us in monitoring relevant international developments. A summary of key themes was shared with the SSP Steering Committee after the Dialogue.
<b>Australian Government’s Modern Slavery Conference (2023)</b>	Multi-stakeholder	Participation in the Conference enabled us to deepen our understanding of modern slavery risk areas and examples of good practice. A summary of key themes was shared with the SSP Steering Committee after the conference.
<b>Research project on remediation of modern slavery in supply chains</b>	Academia	We engaged with a university research team that is looking at the issue of remediation of modern slavery in supply chains. By sharing our insights and experiences with academics, we hope to contribute to this research and the development of knowledge and solutions that can be used by a wide range of stakeholders.
<b>Australian Government’s Modern Slavery Expert Advisory Group</b>	Government	Our Group Head of Sustainability’s participation in the Expert Advisory Group allows us to offer insights into the practical application of the Modern Slavery Act to the Australian Government and identify opportunities to raise awareness and capacity within the business community. It also provides a space for us to enhance engagement with other key stakeholder groups such as civil society, unions, investors and academia.
<b>Engagement with retailers</b>	Customers	We engaged with several of our retail customers during the reporting period in relation to modern slavery. This engagement stemmed from supplier due diligence requests that we received from them, leading to ongoing conversations about challenges in the agriculture sector, exploring potential opportunities for collaboration across our value chain and informing our own approach to risk management.



# Grievance mechanisms and remediation

## Commitment to remediation

In line with the UNGPs, where we identify that we have caused or contributed to human rights harms, including modern slavery, we are committed to providing for, or cooperating in, effective remediation. We also recognise that there may be situations where we are directly linked to human rights harms, including modern slavery. In those situations, we will seek to use our influence to play a role in remediation. We have ongoing relationships with a number of strategic suppliers in countries reported to be of higher risk for modern slavery and have been working to use our leverage to influence better practices in those regions (see page 24 for more information on supplier engagement). We will continue to explore ways to build and use our leverage over the coming reporting period.

## Overview of our grievance mechanisms

### Internal grievance mechanism

The objective of the SunRice Group Grievance Policy is to promote and foster a harmonious working environment by providing a process whereby conflicts and disputes are resolved quickly and amicably and to the satisfaction of all concerned parties. The Grievance Policy outlines the steps for raising grievances, the resolution process including the possibility of mediation or conciliation, and the underpinning principles of confidentiality and accountability.

If an investigation is to be undertaken, an internal investigator or, if deemed appropriate by the SunRice Group, an external investigator will be appointed to conduct the investigation impartially and sensitively. The Grievance Policy also outlines the variety of outcomes that may be achieved including an apology, targeted training, changes to working arrangements and/or disciplinary action.

## Speak Up Policy and whistleblower program

### Who?

Speak Up provides an avenue for a range of persons to make a report about anything that they have reasonable grounds to suspect concerns, misconduct, or an improper state of affairs or circumstances, in relation to any member of the SunRice Group. The Speak Up Policy is available to those who are or have been an employee, officer or director of a member of the SunRice Group, as well as others with a connection to the SunRice Group such as suppliers of goods or services to an entity in the SunRice Group, contractors, consultants and other business partners (including someone who is or has been employed by a supplier), or a relative, spouse or dependent of any of these individuals. This includes workers in our supply chain and community members.

### What?

Reportable conduct can include any potential breach of the law or our key policies including our Code of Conduct, Anti-Bribery and Corruption Policy and our Supplier Sustainability Code. This includes issues related to human rights including labour exploitation and modern slavery.

### How?

A Speak Up report can be made in writing or verbally including to:

- The Integrity Officer;
- a Director or member of the CMT;
- the Speak Up hotline (phone, QR code, online); and
- an Ambassador (for those working in PNG, Solomon Islands and Vietnam) or General Manager.

### When?

The Speak Up hotline is administered by NAVEX Global, an independent third party and is available 24 hours a day, seven days a week.

### Key elements

- The Speak Up Policy is available in English, Vietnamese, Arabic and Pidgin;
- Confidentiality protected;
- Option for anonymous reporting (through the Speak Up hotline);
- All reports are taken seriously;
- Commitment to non-retaliation and reprisals;
- Ongoing communication with complainants;
- External third-party support (as required); and
- Ambassadors to promote the mechanism.





### How we seek to build awareness of Speak Up

A grievance mechanism is only effective if it is known and accessible to, and trusted by, the users it is designed to serve. We are committed to strengthening our grievance mechanisms to align them with the UNGPs effectiveness criteria for operational grievance mechanisms.<sup>35</sup>

We seek to raise awareness of our Speak Up whistleblower program with our employees in a number of ways.

- Information on our Speak Up program is included in SunRice Group’s Code of Conduct and is discussed in our induction training sessions.
- Guidance materials including posters for our grievance channels are displayed in our own facilities and we regularly promote the Speak Up hotline in our internal newsletter, The Roundup, which is distributed to all staff with email addresses and displayed in lunchrooms at some of our facilities.
- Materials are also shared with our suppliers to help raise awareness of our Speak Up mechanism with workers in our supply chain.

We have Anti-Bribery and Corruption Ambassadors located in PNG and Vietnam to promote both the Speak Up mechanism and our ABC Policy.

The Ambassadors also make themselves available to employees to provide them with the option of raising issues with a trusted internal representative, in addition to employees being able to use the external Speak Up hotline.

Training to promote understanding and awareness of our Speak Up program is conducted both online and face-to-face. The training provides an overview of relevant SunRice Group policies (including the ABC Policy), the rights of and the protections for employees and how to make a report. During FY24, as part of our pre-audit engagement, we provided information on Speak Up to employees at our operational sites.

### Speak Up reporting during FY24

Data on the number and outcomes of Speak Up reports is provided twice a year to the SunRice Board’s Finance, Risk and Audit Committee (FRAC) by the Integrity Officer. The information provided to the FRAC includes information related to the key issues and themes arising from the reports and steps taken to ensure anonymity is protected.

No modern slavery-related complaints were made during FY24. However, we acknowledge the absence of complaints does not necessarily indicate the absence of occurrences or risks. We will continue to monitor reports for precursors to human rights related matters, including modern slavery.

**Speak Up!**

**Bribery or corruption**

**Forced to work**

**Underpaid**

**Underage workers**

**Bullying or abuse**

**Unsafe work environment**

**Encounter any of the above? If so, speak up.**

**To report a concern to SunRice directly:**  
 Email: [ABCreporting@sunrice.com.au](mailto:ABCreporting@sunrice.com.au)  
 Post: PO Box Q166 QWB, Post Shop, NSW 1230, Australia  
 Call: +61 2 9358 2074

**To report a concern to our independent Speak Up hotline:**  
 Online: [sunrice.ethicspoint.com](http://sunrice.ethicspoint.com)  
 Australia: 1800 953 947  
 US: 833 581 0346  
 Singapore: 800 852 3976  
 PNG: 000 861 271  
 Vietnam: Dial the direct access number for your location: 1 201 0288 or 1 228 0288. Then, dial 833-581-0346 and follow the prompt.

**Scan QR code to make a report:**  
 Speak Up is a service managed by an independent third party. It provides an avenue for SunRice employees and suppliers and their workers to report issues confidentially and anonymously.

**ZERO TOLERANCE** Make a Difference  
 SunRice Group

**SunRice** **CopRice** **ags** **SunFoods** **Riviana** **APC** **FRAC**

35. The UNGPs set out criteria to ensure operational-level non-judicial grievance mechanisms are effective. This includes that grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.

# Assessing the effectiveness of our approach

Ensuring our modern slavery and broader human rights program is having an impact is critical to us. This includes being able to outline our impact in a consistent way.

## Embed robust governance systems for the SunRice Group's operations on human rights including modern slavery

### Key outcomes in FY24

- Delivered work to update and/or develop policies and guidelines including our Group Procurement Policy, the Supplier Sustainability Code, and commenced the creation of guidelines to outline our approach to providing accommodation globally.
- Convened six meetings of the SSP Steering Committee.
- Engaged Monash University to undertake a benchmarking review of our FY23 Modern Slavery Statement against ASX100, ASX300 and a group of our peers.

### How this helps us to assess effectiveness

Through the SSP, we review key policies and governance frameworks to evaluate their effectiveness and whether they remain fit-for-purpose and reflect our operating environment. This has led to an update of a number of policies, guidelines and procedures across the SunRice Group during FY24.

## Implement our 3-year social and ethical audit plan at SunRice Group's owned and controlled sites that prioritises sites based on human rights-related risks associated with our operations

### Key outcomes in FY24

- Implemented a revised audit plan using a risk-based tool that takes into consideration customer requirements and operational requirements.
- Conducted four SMETA audits in FY24. Fourteen SMETA audits of SunRice Group sites have been completed to date, plus two re-audits at the SunRice Leeton Mill and SRFG facility.

### How this helps us to assess effectiveness

Audits help us to understand whether we have consistent compliance with local legislation and the ETI Base Code across our operations. Audits also help us to identify opportunities for us to work with business partners to improve policies and practices to address identified non-compliances.

## Minimise the risk of labour rights abuses in our operations and supply chain

### Key outcomes in FY24

- Embedded modern slavery risk identification and assessment into the NPD process.
- Commenced a review and update of our supplier segmentation process.
- Developed a new supplier SAQ to increase our understanding of potential modern slavery risks in our supply chain and enhance supplier screening.
- Selected a new e-learning module for suppliers on forced labour (from a third party provider).

- Commenced development of internal guidance to inform our screening process for entering new countries for rice sourcing, establishing new operations associated with rice (i.e. milling), or partnering with processing companies with an existing presence which includes consideration of human rights-related risks.
- Established a working group to look at the issue of working hours and conducted internal and external research to inform next steps.
- Worked with our operational sites to strengthen or establish risk assessment processes, systems and procedures to address non-compliances identified through SMETA audits.
- Carried out an assessment of health, safety and environmental risks relating to harvest (including working hours) in advance of the Australian harvest.
- Integrated sustainability considerations, including related to human rights, into M&A processes.

### How this helps us to assess effectiveness

Modern slavery risk identification and assessment processes helps us to understand the extent to which our expectations are being implemented by our employees and suppliers.

## Build internal capability to identify and remediate issues as they arise

### Key outcomes in FY24

- Continued rollout of mandatory modern slavery training for employees and targeted training for key business functions on the Supplier Sustainability Code.
- Delivered in person training at our SunRice Leeton and Vietnam mills, Solomon Islands site

and SRFG facility on the ETI Base Code, which included information on how to raise a concern using the Speak Up mechanism.

- Participated in several multi-stakeholder events on modern slavery and broader human rights issues.
- Monitored reports from Speak Up with data provided twice during the year to the SunRice Board's FRAC by the Integrity Officer.

### How this helps us to assess effectiveness

Providing modern slavery training and targeted training on the Supplier Sustainability Code helps us understand the capacity of our people to identify and address modern slavery risks.

Hearing about peer practices (including how they respond to challenges) provides an opportunity for learning and helps us identify opportunities to keep improving our approach.

Monitoring reports from Speak Up and other channels enables us to detect patterns, guide due diligence measures and shape policy development.

## Foster open and trusted supplier relationships to identify and remediate labour rights issues across our supply chain

### Key outcomes in FY24

- Engaged with priority suppliers on audit findings and SAQ results including on the development of corrective action plans.

### How this helps us to assess effectiveness

Engaging with suppliers and other business partners provides us with feedback on where our approach is working and where we have opportunities to improve.





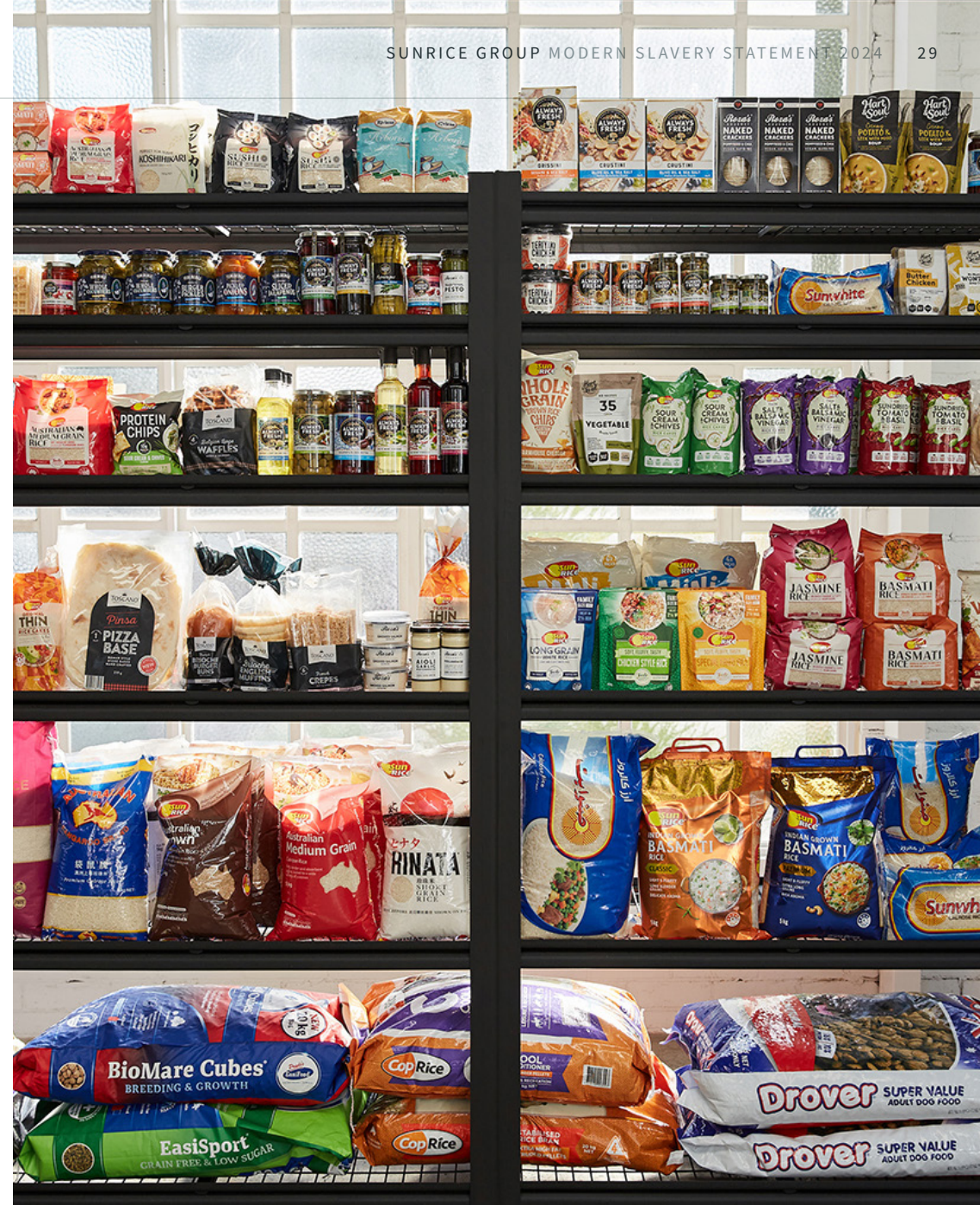
# Consultation process

The development of this Statement was led by the Sustainability Team with input from various functions across the reporting entities including Corporate Affairs, Group Finance, Risk, Global Supply Chain and Manufacturing, Procurement, People and Culture, Legal, International Sourcing, Product Development, Quality and Health, Wellbeing, Safety and Environment. The consultation process also involved input from the CMT and other senior leaders and employees across our owned and controlled entities and our business units including Global Rice, CopRice, Trukai and Riviana (which is also a reporting entity).

The ongoing development of our Modern Slavery Statement, and our modern slavery risk management approach, includes cross-functional consultation with input from key areas of our business. We understand that actively engaging with our people, regardless of their roles, builds internal alignment and is a fundamental component

in developing robust programs and procedures. The SSP Steering Committee is central to our approach as it provides a framework for ongoing consultation, engagement and collaboration across the SunRice Group. The consultation and exchange of information not only supported the development of this Statement but the ongoing implementation of the SunRice Group's response to modern slavery.

This Statement was reviewed and endorsed by the CMT. The CMT comprises executives from across the SunRice Group who have specific operational and functional responsibility for the reporting entities, controlled entities and business units, including Global Rice, CopRice, Trukai and Riviana. In addition, the Statement was reviewed by the SunRice Board's SHS Committee before it was approved by the Board.





# Regulatory disclosure matrix

This Statement was prepared to meet our regulatory disclosure requirements and complements our existing sustainability disclosure found on the SunRice Group’s investor website and Annual Reports. This Statement is made in accordance with the *Australian Modern Slavery Act 2018 (Cth)* and with regard to the requirements of the *UK Modern Slavery Act (2015)*.

The tables below reference where within this Statement we address the mandatory criteria for the *Australian Modern Slavery Act 2018 (Cth)* and the requirements under the *UK Modern Slavery Act 2015*.

Australian Modern Slavery Act Mandatory criteria	UK Modern Slavery Act Recommended reporting criteria	Disclosure reference
<b>Mandatory criteria 1:</b> Identify the reporting entity.		About this Statement (page 2)
<b>Mandatory criteria 2:</b> Describe the structure, operations and supply chains of the reporting entity.	Organisation’s structure, its business and its supply chains.	Our structure, operations and supply chain (page 8)
<b>Mandatory criteria 3:</b> Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls.	Parts of its business and supply chains where there is a risk of slavery and human trafficking taking place and the steps it has taken to assess and manage that risk.	Identifying and understanding our modern slavery risks (page 14)
<b>Mandatory criteria 4:</b> Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Policies in relation to slavery and human trafficking.  Due diligence processes in relation to slavery and human trafficking in its business and supply chains.  Training on slavery and human trafficking available to staff.	Assessing and addressing our modern slavery risks (page 18)  Grievance mechanisms and remediation (page 26)
<b>Mandatory criteria 5:</b> Describe how the reporting entity assesses the effectiveness of such actions.	Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Assessing the effectiveness of our approach (page 28)
<b>Mandatory criteria 6:</b> Describe the process of consultation with any entities that the reporting entity owns or controls.		Consultation process (page 29)
<b>Mandatory criteria 7:</b> Any other information that the reporting entity considers relevant.		Appendix 1: Our brands (page 31)  Appendix 2: Our owned and controlled entities (page 32)

## Appendix 1: Our brands



KOSHIHIKARI



TASTIC



## Appendix 2: Our owned and controlled subsidiaries

Name of entity <sup>36</sup>	Country of Incorporation	Principal activities	SunRice Group interest in the entity in FY2024 (%)
<b>Ricegrowers Limited</b>	<b>Australia</b>	<b>Ultimate parent entity</b>	<b>-</b>
<b>Riviana Foods Pty Ltd<sup>37</sup></b>	<b>Australia</b>	<b>Importation / manufacturing / distribution of food products</b>	<b>100</b>
Australian Grain Storage Pty Ltd*	Australia	Grain storage assets	100
Rice Research Australia Pty Ltd	Australia	Research into rice growing	100
Roza's Gourmet Pty Ltd	Australia	Manufacturing / distribution of food products	100
KJ&Co Brands Pty Ltd	Australia	Importation / distribution of food products	100
SunRice Australia Pty Ltd	Australia	No current activities	100
SunRice Fund Limited	Australia	No current activities	100
SunRice Trading Pty Ltd	Australia	No current activities	100
Pryde's Tuckerbag Pty Ltd	Australia	Holding company	100
Pryde's Easifeed Pty Ltd	Australia	Manufacturing / distribution of animal food products	100
Pryde's Easifeed NZ Limited	New Zealand	Distribution of animal food products	100
Ricegrowers New Zealand Ltd	New Zealand	Distribution of rice and other food and animal nutrition products	100
Aqaba Processing Company Ltd	Jordan	Rice packing / storage	80
Rice Industries Limited	PNG	Property	66.23
Trukai (Wholesale) Limited	PNG	Distribution of rice	66.23
Trukai Industries Limited	PNG	Processing and distribution of rice	66.23
Ricegrowers Singapore Pte Ltd	Singapore	Procurement and trading of rice and other food products	100
Ricegrowers Limited Japan	Japan	No current activities	99
Solomons Rice Company Limited	Solomon Islands	Distribution of rice	100
Ricegrowers Middle East DMCC	UAE	Distribution of rice and other food products	100
SunFoods LLC	USA	Processing and distribution of rice	100
Sunshine Rice, Inc	USA	Holding company	100
Sunshine Rice Pty Ltd	Australia activities	No current	100
Ricegrowers Vietnam Company Limited	Vietnam	Processing and distribution of rice	100
SunRice Trading (Shanghai) Co Ltd	China	No current activities	100

36. The line items in bold are reporting entities under the Act.

37. Entities part of a Deed of Cross Guarantee that are relieved under the ASIC Corporations (Wholly-owned Companies) Instrument 2016/785 from preparing a separate financial report (see note 5c) of the Annual Report.