

Lite n' Easy

MODERN SLAVERY STATEMENT 2022



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Introduction

Lite n' Easy is a proven leader in food and nutrition innovation, and has become an established, trusted supplier of meals to our valued customers Australia wide. To deliver on our mission of providing safe, quality and nutritious food, we need to ensure our business processes and control systems are effective in identifying and remediating modern slavery risks posed to the business and communities we work within.

Recognising modern slavery is a crime and can take many forms, we have adopted a zero tolerance approach to modern slavery across our entire business, including our engagement with all suppliers as well as our employees.

This statement outlines the management of modern slavery throughout the company, including operations and supply chain, as well as the current processes in place. We are committed to strengthening our due diligence across our value chain and being a part of the collaborative change needed to address the causes of modern slavery.

We acknowledge the Australian Government is currently conducting a three year review of the Modern Slavery Act 2018 (Cth) and welcome the revised directive expected early next year. We will ensure ongoing alignment with meeting our responsibilities to the continued efforts for the abolishment of modern slavery.

This statement has been issued in accordance with the Modern Slavery Act 2018 and covers Lite n' Easy PTY Ltd. It has been considered and approved by the Advisory Board on the 27/12/2022. This statement demonstrates our commitment to ethical trading, tackling modern slavery and overall strategy to increase transparency within our supply chain and our own operations.



CEO Statement



Lite n' Easy has over 30 years experience in providing safe, quality and nutritious meal solutions, not only for weight loss and convenience, but for our aging populations, NDIS and Home Care providers. Our values and **How We Work Together Commitments (HWWTC)** provide the fabric in which we hold ourselves and others accountable in doing the right thing. We understand that modern slavery is illegal with practices of this nature being intolerable and having no place in the business, in our communities or anywhere in the world. Respecting the human rights of the people we employ or otherwise interact with, and implementing governance policies and training around modern slavery, further demonstrates that we do not tolerate, and are firmly opposed to all forms of human rights violations or poor labour conditions in our operations and supply chain.

Lite n' Easy remains committed to;

- a) Creating a business environment that is free from exploitation or abuse of the vulnerable,
- b) Pursuing continuous improvement in our own policies, processes and systems to identify and eliminate modern slavery risks within our operations and supply chain,

- c) Engaging partners with like-minded values within our supply chain and creating a business model valued by our customers and our employees,
- d) Ensuring transparency in our activities and annual reporting.

In FY22, we have commenced reviews of our governance structure, policies, systems, industry engagement and business partners as part of our initiative to both champion and deliver sustainable change. Engaging with our suppliers via the approved supplier program facilitated further assessment of risks as well as providing the opportunity of sharing modern slavery initiatives and industry progress. Our approved supplier program has so far achieved a 50% response rate from just over 500 suppliers. All senior management and relevant key departments have completed modern slavery training. A modern slavery policy has been drafted and is currently under final review with our committee.

Ethical recruiting remains on our agenda as well as a clear focus on gender equality and diversity opportunities within the work place. This focus drives a safe and quality work environment, free from discrimination or harassment. Updating our Code of Conduct Policy empowers our team members to increase their awareness and obligations towards modern slavery. Strengthening our data protection also ensures greater privacy protection for our teams and community.

Combined, the above mentioned framework will assist the business in its continued efforts to identify modern slavery risks and they form the key deliverables which the Advisory Board and ESG committee will use in assessing the strategic and risk mitigation opportunities.

We fully support industry collaboration to identify and remove causes of modern slavery in our society.

A handwritten signature in black ink, appearing to read 'Dennis Stark'. The signature is fluid and stylized, with a prominent loop at the end.

Dennis Stark
CEO, Lite n' Easy | December 2022

Our Structure, Operation and Supply Chains

STRUCTURE

Lite n' Easy sources fresh produce, raw materials and service providers in order to manufacture and deliver nutritious meals direct to customers and aged care facilities.

Our key brands include **Lite n' Easy** and **My Choice**.

Lite n' Easy is a 100% Australian, privately owned business operating since 1986. Currently represented with 6 state based sites, the group is managed by an experienced leadership team reporting to an Advisory Board.

Lite n' Easy Pty Ltd (ACN 010 655 820) and its associated entities, being:

Lite n' Easy (Queensland) Pty Ltd
ACN 066 985 073;

Lite n' Easy (New South Wales) Pty Ltd
ACN 165 076 380; and

Lite n' Easy (Victoria) Pty Ltd
ACN 153 499 579.

OPERATIONS

Our workforce consists of approximately 2000 team members either on a fulltime, part time, casual or contract basis. Approximately 1100 team members are directly involved in manufacturing, packaging and safe food preparation across all Lite n' Easy entities.

Prior to recruitment, work eligibility is verified to comply with all Australian employment legislation including, but not limited to visa checks and right to work. The diversity of our team members is considered in the development of internal policies and standards, which are made readily available to our team members through our document management system and notice boards. All reviews have inbuilt remediation processes. If any errors are identified through periodic financial reviews or internal audits covering fair pay, entitlements, work conditions or breaches of the code of conduct, a risk assessment and corrective actions can be immediately completed. This reduces any identified risks to low, across employment, wages, welfare, health and safety throughout our operational and supply chain teams.



We produce more than 1.5 million fresh and frozen meals each week



We complete 15,000+ home deliveries to Home Care Package & CHSP recipients every week



We deliver to more than 95% of the metro, regional and rural population



Risk of Modern Slavery Practices

SUPPLY CHAIN

We source high quality ingredients, raw materials and services from over 500 trade and non-trade suppliers. We view and require our supplier relationships to be both strategic and ethical partners to the business. Greater than 90% of the meat, vegetables, fruit and dairy used in our meals are sourced locally from within Australia. Our packaging, snacks and portion controlled items are also manufactured in Australia, using local and imported raw materials. These suppliers have a long standing reputation within their industry and are aware of modern slavery obligations. We also have non trade suppliers providing various goods and services to our operations which includes corporate services, IT and property management.

The inability to audit suppliers face to face over the past two years led to remote desk top audit reviews being created to support our due diligence for risk assessment across our supply chain. By incorporating questions pertaining specifically to supplier actions to the modern slavery act, we have been able to evaluate initial responses and evidence material provided. Questionnaires have been sent to 80% of our packaging and food providers with a 50% response rate; 30% of these responses reflect suppliers have a modern slavery policy or statement in place.

We currently undertake the above mentioned process when taking on new suppliers. Additional considerations in the risk evaluation of our suppliers include, but are not limited to, substantiated media releases, internal vulnerability reviews or other equivalent sources of notifications of any suppliers that are implicated as being associated with modern slavery issues.

COMPLETED AND ONGOING ACTIONS TO REMEDIATE MODERN SLAVERY RISKS

COMPLETED

- ESG committee established with regular meetings
- Road Map developed identifying:
 - › Health and wellbeing action plan
 - › Employment training communication and engagement plan
 - › Cultural awareness training
 - › Diversity and inclusion action plan
- Phase 1 Vendor assurance questionnaires
- Phase 1 Training for Modern Slavery

ONGOING

- Reviewing and updating policies/resources to deliver improvements:
 - › Modern Slavery Policy
 - › Code of Conduct
 - › Onboarding/Ethical Recruitment
- Developing the framework for a Human Rights Program
- Further consolidate supplier tiered risk approach including PPE and sundries
- Phase 2 Modern Slavery training
- A community approach to sharing best practice principles and applications

Risk of Modern Slavery Practices

RISKS IDENTIFIED

Lite n' Easy appreciates that whilst initial risk assessments have commenced with a Modern Slavery assessment intent, increased periodic reviews are required to take into account risks that were either not evident initially or have more recently emerged. Defining the ongoing frequency of our audits and risk review process will need further consideration over FY23.

With the consultative committee and working group reviews completed across our operations and supply chain in FY22, we have identified additional opportunities which have been progressed to agenda items for both the ESG Committee and corresponding working groups:

DIRECT RISK

- Agency labour hire with potential risks for deceptive recruitment processes requires further review, including a better understanding of their procedures with regards to preventing exploitation of migrant workers, correct communications to workers and worker training.
- Due diligence in strengthening contractual controls of Lite n' Easy's requirements in agreements with suppliers.
- Guidance on working hours identifying workloads during contingency work schedules or supply.
- Full understanding of Vendor Assurance Risk Supply Chain and manufacture of PPE and other sundries.
- Due diligence process and Vendor Assurance Risk understanding of training providers.
- Informal internal reporting of risk assessments in regards to modern Slavery.

INDIRECT RISKS

- Contractor and Subcontractor relationships and agreements with focus on drivers, deliveries, construction and contract cleaners.
- Storage movements by contracted storage providers and communication of such movements and locations.
- Resources used by suppliers of print and promotional goods.
- Food processing equipment manufactured and sourced primarily overseas (Europe).

Non-conformances identified during internal, third party or compliance audits are documented on a risk register so corrective actions can be actioned. This approach delivers greater visibility of repeat issues and identifies the suitability and sustainability of corrective actions taken.

Management and team member knowledge surrounding modern slavery risk identification and remediation opportunities, has highlighted that more targeted and specific training is required to ensure proactive momentum is maintained. Training will enable and prepare the business to meet updated regulatory requirements and any emerging improvements from the three year Australian Government review of the modern slavery act. To support this identification over the next 6-9 months, a training 'needs' analysis will be undertaken with a focus on the modern slavery intent.

Risk of Modern Slavery Practices

ACTIONS

The Advisory Board and ESG Committee has formalised a three year plan with core strategic goals that addresses gaps identified and timings to action. A steering committee with multiple working groups and cross functional teams, will review effectiveness of the following:



- Vendor Approval program, utilizing slavery and trafficking risk methodologies currently available with an emphasis on child labour risk in supply chains. If suspected discrepancies are identified, remediation steps will be implemented to ensure compliance.
- Update and standardise Agency hire contracts and partnership agreements across all state based sites.
- Review and update the current Training Matrix with increased e-learning opportunities.
- Ongoing business awareness and communications of modern slavery policies.
- Modern Slavery messaging for visitors and contractors to build greater awareness of current business activities.
- Website updates to enhance customer communications.
- Review the current EAP program for additional support service opportunities for our team members e.g. counselling, pastoral care.

Assessing the effectiveness of our actions

The ESG Committee, working with the support of the Advisory Board, facilitates the review process of the business's strategic direction, proprieties, risk management and continuous improvement initiative.

FY22 saw the implementation of the modern slavery framework with:

- Working groups meeting to address modern slavery with corresponding agendas and action plans
- Vendor Assurance working group with priority/targeted groups highlighted.
- Modern slavery and Code of Conduct training and awareness for key staff via e-learning modules
- Corporate Policy Development – labour hire/migrant hire
- Visitor and Contractor policy – develop and launch action plan
- EAP further development with improved frameworks around Whistle Blower, Fatigue Management and Safe Work considerations
- Ethical sourcing of ingredients captured in the Vulnerability program

To build upon and verify the effectiveness of the business actions, FY23 reporting will also include specific detail on:

- Vendor Approval program supplier tiers
- Risk assessment questionnaire completion rate
- Supply partner evaluation and compliance statement levels
- Internal audit outcomes
- Training Matrix completion reporting
- Agency Hire contracts in place
- Outcomes of cultural awareness training, diversity and inclusion plan
- Governance framework and policy review completion
- Non-conformances & Remediation activities

FY23 FOCUS & CONTINUOUS IMPROVEMENT

We understand it is our responsibility to abolish Modern Slavery impacts and we have a duty of care to continued improvement ensuring our business acts and transacts responsibly.

A key focus for the ESG committee is to plan future activities which support our strategic business goals, as well our suppliers and the sourcing of new suppliers aligned with our mission and values. An ongoing review of policies and training with a focus on raising awareness, protecting our operational team members and those within our supply chain and our communities will also be a key focus.

We remain committed and support a steadfast approach to the abolishment of any modern slavery, servitude, forced or compulsory labour and any human trafficking across the world. We recognise for us to do our part, all future activities will require continued collaboration across industries to achieve the intended outcomes of the Modern Slavery Act 2018 (Cth).



Lite n' Easy

liteneasy.com.au