



MODERN SLAVERY STATEMENT





MODERN SLAVERY STATEMENT

D'Orsogna Limited (ACN 063 427 752)
Financial Year 2020-2021

This Modern Slavery Statement is prepared and issued by D'Orsogna Limited, ACN 063 427 752 (hereinafter referred to as D'Orsogna) and is made pursuant to the *Modern Slavery Act 2018* (Cth) in respect of D'Orsogna and refers to the period 1 July 2020 to 30 June 2021.

MESSAGE FROM THE MANAGING DIRECTOR AND CHIEF EXECUTIVE OFFICER

Dear Stakeholders,

This is D'Orsogna's 2nd Modern Slavery Statement which outlines the undertakings we have made to identify, manage and mitigate modern slavery risks within our operations and that of our supply chain.

The 2021 financial year has been a very challenging year as communities and businesses around the world struggled with the Covid-19 outbreak. The team at D'Orsogna and those of our suppliers based in Australia and overseas have had to navigate extended lockdowns, manage changes in production patterns, and adapt to the fast evolving Government Covid-19 health and safety regimes.

The challenges that our business and those of our suppliers and customers alike have faced in the financial year just passed, has reminded us that our business teams, our people have played a key role overcoming and ensuring the success of our business. This has emphasized the need for us as a business to work together with our suppliers to create a safe and healthy working environment that is free from prejudice and commit to uphold and respect that of an individual's universal human rights.

An integral part of the D'Orsogna business culture is the respect of the human rights of our team members and of every worker that is employed within our supply chain. In 2021, we endeavoured to the best of our abilities to integrate human rights into the way we go about our business and in the decisions we make.

With a proud history and heritage, D'Orsogna is committed to excellence in all we do, from the food we produce to our relationships with employees, customers, partners, consumers and shareholders. We achieve this through the highest standards of safety, quality, innovation, respect and integrity.

More than ever, the Management Team and the Board of D'Orsogna are deeply committed to the pursuit of continuous improvement initiatives. To strive to develop and grow a mature and effective Modern Slavery Compliance Framework to demonstrate our full support of the implementation of the *Modern Slavery Act 2018*.

This Statement was approved by the Board of Directors of D'Orsogna Limited.

Greig Smith
Managing Director and Chief Executive Officer
22 December 2021

INTRODUCTION

A. About our business

D'Orsogna is an Australian owned and operated food manufacturing company employing 750 employees which operates in Australia at two locations, Western Australia (Head Office) and Victoria. D'Orsogna's core business is providing a range of processed smallgoods across Australia.

D'Orsogna is a single entity and operates primarily in the retail industry selling D'Orsogna branded and private label products for sale through various supermarket supply chains throughout Australia, which includes Woolworths, Coles, Costco and Aldi.

B. Key policies and principles to manage modern slavery Risks

D'Orsogna understands that the risks relating to suppliers will vary depending on their industry, geographic location and company size, and therefore, the scope of D'Orsogna's suppliers' policies, processes and systems are expected to reflect the specific risks pertinent to that business.

D'Orsogna's core values were developed and endorsed by D'Orsogna's Management and Board of Directors. These core values were communicated, actively promoted and monitored throughout our business and in our business relationships with our suppliers and customers.



In order to promote and monitor ethical behaviour within our operations, during the reporting period the below policies, procedures and processes were reviewed. Where required these were amended to improve controls and then re-communicated throughout the business.

- Ethical Conduct and Sourcing Policy
- Procurement Policy which incorporates a Supplier Code of Conduct
- Preferred and Approved Vendor Standard Operating Procedure and Register
- Risk Management Policy
- Whistle Blower Policy
- Employee Code of Conduct
- Employment Policy which includes labour hire management
- Grievance Policy
- Vendor contracts during the reporting period that were due to be renewed were reviewed to ensure reference to terms and requirements were included for ethical practices

C. In our operations

In financial year 2021, D'Orsogna continued to review the risk of modern slavery in our operations. The risk of modern slavery in our operations was assessed as low.

The modern slavery risk was assessed to be low due to the following factors:

- Dedicated Human Resources Department led by the HR Manager who is part of the Senior Management Team.
- Human resources controls and processes in place which includes:
 - Inductions and on boarding for new employees. This includes providing information on employee wages, employment conditions and entitlements.
 - Audit compliance in relation to ensuring our employees have work rights, old enough to work and work at D'Orsogna Ltd at their own free will.
 - Employees have access to unions, consultation and grievance raising mechanisms.
 - Company is required to meet Compliance with Australian Employment laws and external auditing is conducted to ensure we meet compliance and employment standards.

- Safety and Health system in place to ensure the welfare of our employees.

MODERN SLAVERY ACT 2018 COMPLIANCE

Risk management and due diligence processes
D’Orsogna Ltd recognises that through its supply chain and operations, it can be directly or indirectly exposed to the risk of modern slavery and human trafficking. In order to mitigate these risks and achieve compliance with the Act, the company has taken the following actions during the reporting period.

- Continued to develop and improve on the D’Orsogna Ltd Preferred Vendor Program which is monitored through the company’s Quality Management System in order to manage risk within its supply chain relationships.
- Reviewed and amended the Ethical Conduct and Sourcing Policy and the Procurement Policy to improve on our risk management processes.
- Reviewed the vendor list to identify any new vendors or vendors that have been discontinued or reduced supply and re-assessed the risks associated with those vendors.
- Reviewed all vendor and supplier related procedures to ensure consistent messaging
- Modern Slavery Act 2018 compliance was an agenda item at both Senior Management and Board meetings.
- Provided information, training and instruction within the organisation and supply chain.
- Our website was updated during the reporting period and includes transparency in relation to the origins of some of our main raw material providers.

SUPPLY CHAIN

A. Analysis of supply chain to identify risk

Our supply chain relationships include suppliers/vendors from the following sectors: information, technology & Communications, maintenance services, maintenance parts, labour hire, security services, logistics, dry goods procurement, raw meat procurement, office supplies, personal protective clothing/protective equipment and medical supply suppliers.

B. The process

Internal modern slavery Risks

During the reporting period we conducted an internal audit our employment practices and grievance reports to identify any modern slavery issues within our own operations. This was an important part of the process as we employ individuals where English is second language and visa workers who may be deemed as vulnerable workers. No modern slavery issues were identified during the reporting period.

External modern slavery risks

During the reporting period, we conducted the following activities:

- Conducted a review of Vendors on the preferred vendor list to identify potential modern slavery risks and to update key contacts information.
- Conducted a review on actual spend for the 2021 financial year by supplier, then ranked our suppliers from highest spend to lowest.
- Issued questionnaires to any new or proposed vendors in order to conduct a risk assessment. The process also included the supplier advising of other third party suppliers within their supply chain.
- Updated the Supplier Risk Register and Preferred Vendor Register and identified the supply chain risks in regards to modern slavery.
- Monitored any news/announcements in relation to our vendors for any ethical issues being reported.
- Improved supplier contract review process to ensure that relevant clauses with regards to the respect of human rights and relevant measures against modern slavery were included in the supplier’s obligations.
- Reviewed risk assessment criteria to ensure it was current.
- On review of current data, we noted that most of D’Orsogna’s direct supply chain spend continues to be with meat suppliers, who are located in Western Europe, Australia and North America.

C. Effectiveness of actions taken

During this reporting period, our focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains.

Our review of the current reporting period identified that we need to improve our review and

assessment process to allow us to adequately assess the full effectiveness of the measures we have implemented and undertaken. We are in the 2nd year of the implementation of the *Modern Slavery Act of 2018* and we recognise that our review and assessment process has its limitations to identify and address our modern slavery risks within our operations and across our supply chain. We are committed to continue to improve our review and improvement process.

We believe that the involvement of our Senior Management Team and the Board of Directors is fundamental to the ultimate success in implementing the *Modern Slavery Act of 2018* by “leading from the top down”. We have introduced modern slavery risks into our business risk matrix which will be discussed and addressed periodically at the Management and Board meetings.

The clear expectation is that each area of the business is responsible for identifying and assessing their own operations and supply chain for human rights risks and to implement appropriate controls with support from our risk management team.

In the 2021 financial year reporting period, the focus was on mapping and understanding the supply chain in more detail to help close the risk knowledge gaps identified, and for the Management Team to put the necessary processes in place to implement a detailed and thorough risk assessment program.

The program is still in development, but based on the assessments and monitoring conducted to date, this has indicated that the team is aware of the risks of modern slavery and the process has identified where we can make improvements in our supply chain.

RISKS OF MODERN SLAVERY PRACTICES IN D’ORSOGNA’S OPERATIONS AND SUPPLY CHAINS

A large portion of our supplier and procurement spend continues to be with suppliers based in countries, like Australia and Denmark, that have a lower risk of experiencing modern slavery practices, as identified by the Global Slavery Index (GSI). However, there are some suppliers that fall

in a higher to modern slavery risk category, such as China. Whilst geography is only one factor used in assessing the overall risk of a supplier, it has been an important starting point for the business to understand the level of risk and mitigation strategies.

Impact of COVID-19 on modern slavery risks

As felt by many other companies around the world, COVID-19 continued to present a range of challenges for D’Orsogna and for our extended supply chain.

D’Orsogna recognises that COVID-19 has continued to have an impact on modern slavery risk as we have been restricted in our ability to fully assess and address risks within our supply chain. The main cause of this being the shortage of certain goods or delays within our supply chain that may result in alternatives having to be sourced at short notice and our assessment process is conducted on a good faith and based on what information or validation provided from the supplier.

In summary, we have assessed that there is a risk of modern slavery being present in our extended supply chain due to the geographical locations from which products and raw materials are sourced.

In the next reporting period, D’Orsogna intends to conduct further review and assessments based on these findings and impacts.

FUTURE ACTIONS TO BE TAKEN TO ADDRESS MODERN SLAVERY RISKS

D’Orsogna is committed to continuous improvement in the area of modern slavery therefore a number of actions including training and awareness will be conducted over the next reporting period.

Actions planned

- Team members who deal with our suppliers will be required to complete a training program that will cover modern slavery and ethical sourcing.
- Continuous review of Supplier Contracts to ensure that suppliers meet the supplier code of conduct.

- Continue with information collation and risk assessment process.
- Investigate the use of third party, such as SEDEX or Modern Slavery Platforms, to assist with data collation and compliance with our procedures.
- Internal worker education on key employment rights and minimum conditions.
- Continue with internal auditing processes.
- Training programs on employment related policies and procedures for our internal management team.

REMEDIATION

Where a legitimate modern slavery concern or issue is raised through one of our grievance mechanisms, we are committed to work with our suppliers, Government and worker representative bodies to ensure an appropriate remedy is provided.

Our grievance mechanisms

We respect the rights of individuals therefore to support this we provide a number of grievance mechanisms.

A. Whistle Blower Policy

Our Whistle Blower Policy encourages the reporting of any suspected unethical, illegal, fraudulent or undesirable conduct, including suspected adverse impacts on people, communities or the environment within our supply chain. The Whistle Blower Policy includes an external hotline number to PWC who monitor and provide quarterly reports.

B. Internal Grievance Procedures

The company has an internal Human Resources Department and a documented grievance procedure. To communicate this to our team members, we provide several methods such as inductions, re-fresher inductions and visible printed copies on noticeboards or via internal intranet. The procedure includes the process of accessing government bodies such as Fair Work Australia if remedy is found non-satisfactory or Worksafe Australia for safety related grievances.

This Modern Slavery Statement is prepared in accordance with the criteria set out in the *Modern Slavery Act 2018* (Cth).