



Modern Slavery Statement FY23

1. Reporting and Consultation

We have prepared this statement to meet reporting requirements under the Australian Modern Slavery Act 2018 (Cth). The statement outlines the actions that have been taken by Chrisco to identify, assess, and address modern slavery risks across our operations and supply chains in the financial year ending 30 June 2023 (FY23).

Chrisco makes this single joint modern slavery statement on behalf of the following entities:

- Chrisco Hampers Australia Limited (NZBN 9429037963507, ABN 41080852535);
- Chrisco International Holdings Limited (NZBN 9429045898129);
- Chrisco Hampers Limited (NZBN 9429037333386);
- Chrisco Distribution Limited (NZBN 9429035341345); and
- Chrisco IP Limited NZ (NZBN 9429034998274).

Whilst some of the entities listed above may not be reporting entities for the purposes of the Act, we have adopted a 'business-wide approach', and this statement applies to all of Chrisco's operations.

Consultation

Chrisco has policies, systems and procedures that apply broadly across our business.

Our modern slavery working group consulted relevant management, procurement and buying teams from entities we own or control.

We gathered some information about the supply chains and operations from each of the above entities and reviewed the processes that they have in place to monitor and address modern slavery risk. This modern slavery statement was also circulated to relevant members of our leadership team for comment prior to being put to the Board of Chrisco for review and approval.

This modern slavery statement was approved by the Board of Chrisco on 27th November 2023.



From Our CEO

I am pleased to present Chrisco's fourth modern slavery statement, which has been prepared to meet reporting requirements under the Australian Modern Slavery Act 2018 (Cth).

Chrisco remains dedicated to an ongoing process of due diligence aimed at recognising and mitigating possible modern slavery risks. This commitment involves the identification of potential risks such as human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment for labour or services, and the worst forms of child labour.

Chrisco is committed to continuing our ongoing review of our supply chain, our work on human rights due diligence, and the continued identification of the modern slavery risks that may exist in our operations and supply chains.

We look forward to continuing our anti-modern slavery work in FY24.



Geoff Spong

Chrisco CEO & Managing Director

27th November 2023

2. Modern Slavery Statement Overview

The *Modern Slavery Act 2018* section 16 mandatory criteria and reporting requirements have been addressed in this statement as follows:

Identification of the reporting entity

This is addressed on page 2.

Description of the process of consultation with any entities the reporting entity owns or controls

This is addressed on page 2.

Description of our structure, operations, and supply chain

This is addressed on pages 4-7.

Description of the risks of modern slavery practices in our operations and supply chains and any entities we own or control

This is addressed on pages 8-16.

Description of the actions we have taken to assess and address these risks

This is addressed on page 16.

How we assess the effectiveness of our actions

This is addressed on pages 17-18.

3. Our Structure, Operations and Supply Chains

The Chrisco Group is a privately-owned company and acts as the purchasing agent for Chrisco Hampers Australia Ltd. Chrisco is a company registered in New Zealand that has been operating in Australia since 1997, with our head office located in Granville (Sydney), New South Wales. Chrisco offers a broad range of goods including food hampers, gift cards, homewares, gifts and other merchandise to consumers via regular payment plans.

Chrisco sells its goods exclusively via catalogue and its website at www.chrisco.com.au. Consumers can place orders by completing the form in the Chrisco printed catalogue, making an online order via the Chrisco website, or placing a phone order to a trained Chrisco agent.

Chrisco sells and delivers Christmas Hampers containing foodstuffs and wider consumer goods to 100,000+ customers in Australia (80%) and New Zealand (20%). Chrisco customers are able to pick their hampers or consumer goods up to 14 months in advance of their delivery either to the customer's home, or to a 'depot collect' when items cannot be delivered directly.

In Australia Chrisco has operations centres in Melbourne, Brisbane, and Sydney.



Our Products

Chrisco provides customers with a wide range of products which include:



Hampers

We provide a huge selection of hampers that include pantry food items, freezer items, beverages and alcohol, butchery and frozen seafood, personal care products and home and cleaning products.



Electronics

We sell personal and home electronics such as Apple iPads, iPhones and Apple watches, audio & TV equipment, consoles and games from Nintendo, home arcade game machines, headphones and TV's & home theatre systems



Sports and Recreations

We supply sports and recreation equipment including pools and spas, home gym fitness equipment, bikes quad and motorbikes and children's outdoor play equipment.



Camping and outdoor equipment



Furniture and homewares



Whitegoods & vacuums



Kitchen appliances



Garage and tools



Gift cards

Services and Goods-not- for-resale

Our local operations, including our call centres, warehouses and freight distribution centres, procure services and goods-not-for-resale and we have incorporated these into our modern slavery risk assessment process below. These services encompass freight distribution, logistics, cleaning, security, communication, and recruitment support.

We recognise that within these service sectors, there are workers with varying skill levels and individuals who may be susceptible to exploitation or potential victims of modern slavery practices.

FY2020

- Commitment by the Board and executive team
- Establishment of our modern slavery working group
- Planning for rollout of our product and services supplier review
- Planning for updates to internal supplier policies
- Planning for first modern slavery training module

FY2021

- Roll out of our first round of supplier questionnaires to first-tier suppliers
- Update of our Chrisco Supply and Trading Terms Agreement to incorporate a modern slavery and social responsibility clause
- Modern slavery risk assessment
- Review of our first round of modern slavery training for buying and procurement

FY2022

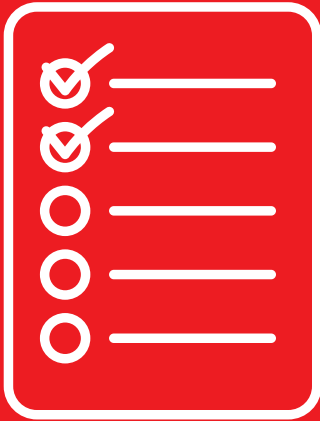
- Review of our first responses from the supplier questionnaires
- Development of targeted training for procurement and buying teams
- Planning for the ethical sourcing policy inclusions
- Continued assessment of our supply chains and operations and communications with first and second-tier suppliers.

FY2023

- Update of our internal modern slavery training module
- Development of guidance for buyers and suppliers to assist in identifying modern slavery risk within our supply chains
- Review of the Chrisco Supply and Trading Terms Agreement and Supplier Code of Conduct

Timeline of actions taken to address Modern Slavery

Modern Slavery Goals for FY24



- Planning to ensure that our modern slavery goals meet the UN Guiding Principles on Business and Human Rights (UNGPs)
- Present modern slavery risk updates and mitigation strategies to our executive leadership team
- Roll-out of our updated tailored modern slavery training module
- A further detailed review of our services and good-not-for-resale suppliers
- Explore potential collaborations with groups and organizations dedicated to managing and eliminating modern slavery

4. Risks of Modern Slavery Practices

Chrisco recognises that sourcing our products comes with possible modern slavery risks.

Certain products and services we acquire carry an inherent risk of modern slavery, either from geographical risks, the type of the product or service itself, or the raw materials utilised in the production of our many products.

We acknowledge the possibility of modern slavery in our supply chains and business operations. This pertains specifically to our modern slavery risks concerning:



Supply chain transparency



Electronic products



Production of goods using raw materials



Services and goods not intended for resale

Limited transparency regarding the local operations of our suppliers can obstruct our ability to identify all possible modern slavery risks. We depend on published guidance to enhance our understanding of modern slavery risks and use our updated training programs to ensure that our buyers are aware of the specific risks for Chrisco products and services.



Supply chain transparency

Many of the major businesses that we engage have taken steps to enhance transparency and accountability in addressing modern slavery by the publication of modern slavery statements or modern slavery compliance information online.

In our efforts to assess and manage our own possible modern slavery risks, we rely on the valuable information published by these large businesses along with our own due diligence processes. This approach ensures that we stay attuned to industry best practices and uphold our commitment to responsible business conduct.





Electronic products

Chrisco sells quality electrical and homewares products that we source from leading major international brands including electronic devices from Apple, Samsung, Nintendo, Acer and Microsoft and electrical appliances from Dyson, LG, KitchenAid (Whirlpool) Breville, Fisher & Paykel and Panasonic. In 2023 The Walk Free Foundation identified electronics as the highest risk items for modern slavery risks.

All our suppliers of electronics and electrical appliances listed above have submitted current modern slavery statements and we rely on the due diligence reporting of these businesses to inform our risks in this sector. We will continue to review of our electrical and electronic product risk in FY24.



SUPPLIER CASE STUDY:

Ensuring Ethical Practices at Samsung

Samsung has published its commitment to maintaining ethical standards across its global operations, as reflected in its Child Labour Prohibition Policy. Aligned with international standards and national regulations, this policy enforces a zero-tolerance approach towards child labour and is applicable to all Samsung worksites, including suppliers and third-party recruitment agencies. The policy establishes stringent regulations prohibiting the employment of children and young individuals.

This commitment underscores Samsung's dedication to fostering responsible business conduct and upholding ethical practices throughout its supply chain.

Chrisco will continue to monitor these practices for Samsung and our other electrical product suppliers throughout FY24.



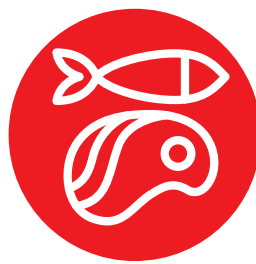
Production of goods using raw materials

Chrisco supplies thousands of products over multiple product categories and acknowledges that with such a large number of products, there are modern slavery risks in the raw materials used to produce them. Given the volume and diversity of our product range, Chrisco recognises the complexity associated with ensuring ethical and responsible sourcing practices throughout its supply chain. These risks are mainly connected to the cultivation, extraction, manufacturing, and supply chain procedures linked with those raw materials.

As part of our continuous efforts to conduct our supply chain review, our attention has been directed towards three specific high-risk product categories:



Cotton



Meat and Seafood



Palm Oil





Cotton

Chrisco sells a range of finished textiles and homewares that use cotton as their raw material. We are aware of the potential modern slavery risks in certain cotton-growing areas where agricultural labourers may face exploitation. Obtaining these items as final products directly from our suppliers means we lack transparency over the production processes and the origins of the raw materials used.

We rely on published information from our trusted suppliers and as part of our ongoing supplier review and transparency initiatives, we continue to seek information about the sourcing of raw materials for these products.



SUPPLIER CASE STUDY:

Sealy Asia Pacific

Sealy Asia Pacific outlines its approach to embed its Anti-Slavery Policy into practice including key measures such as a tailored risk assessments to pinpoint areas most susceptible to modern slavery within the business and supply chains.

Sealy implements contractual documentation that prohibits slavery, servitude, forced or trafficked labor, and child labour. Sealy Asia Pacific encourages its contracted suppliers to uphold these expected standards and also reserves the right to terminate any contractual arrangement in case of policy breaches.

The Sealy Anti-Slavery Policy sets clear consequences for breaches, with potential disciplinary actions and emphasises the importance of cooperation in investigations related to suspected policy breaches. The policy requires regular review and updates which demonstrates Sealy's dedication to combating modern slavery and promoting ethical practices within its operations and supply chains.

Chrisco will continue to monitor these commitments in FY24.



Meat and Seafood

Chrisco is proud to supply quality Aussie meats, and we are aware of reports of mistreatment of workers in the meat processing industry. We have long-term relationships with most of our meat suppliers who have previously provided information for our supplier review. We ensure that we review worker-related policies when onboarding new suppliers.

For our finished food products, we rely on the information published in our major suppliers' modern slavery statements and other publications. We will continue to review and gather information on our seafood products suppliers and work with them to identify any modern slavery-related risks during FY24.



SUPPLIER CASE STUDY:

Simplot Australia - Seafood products

Simplot Australia is a parent company to our major food seafood product brands including Bird's Eye, I & J, John West & Seakist. They demonstrate their public commitment to ethical supply chain management through a comprehensive set of policies and procedures. Their Partner Code of Conduct, endorsed by 247 suppliers, mandates adherence to laws and principles prohibiting forced labour, human trafficking, and child labour while ensuring fair wages, reasonable working hours, and safe conditions.

Their supplier onboarding process requires suppliers to endorse their Code of Conduct, and their ongoing supplier audit program evaluates modern slavery risk indicators.

Simplot Australia collaborates with industry partners and various non-government organisations, including Pacifical which aims to ensure human rights are upheld while producing socially responsible tuna for John West and other seafood companies.

As a large agricultural and food manufacturing business, Simplot employs multiple risk assessment tools, utilising data from Sedex radar reports, insights from community partners, and global information sources. The company's commitment to industry collaboration and proactive risk evaluation underscores its dedication to identifying and mitigating modern slavery risks within its operations and supply chain.



Palm Oil

Chrisco is aware that palm oil production has been linked to concerns about environmental and social issues, including labour exploitation. Palm oil is a widely used in numerous food products including baked goods (such as cookies and bread), snack foods (including chips, crackers, and snack bars), chocolate and confectionery, instant noodles, ready-made meals, sauces, soups, ice cream, breakfast cereals, granola bars and infant formula.

As palm oil can be listed under a variety of different ingredient names, it is an ongoing process for Chrisco to identify the products that contain palm oil. We continue to educate our buyers about these high-risk raw materials in our internal modern slavery training.

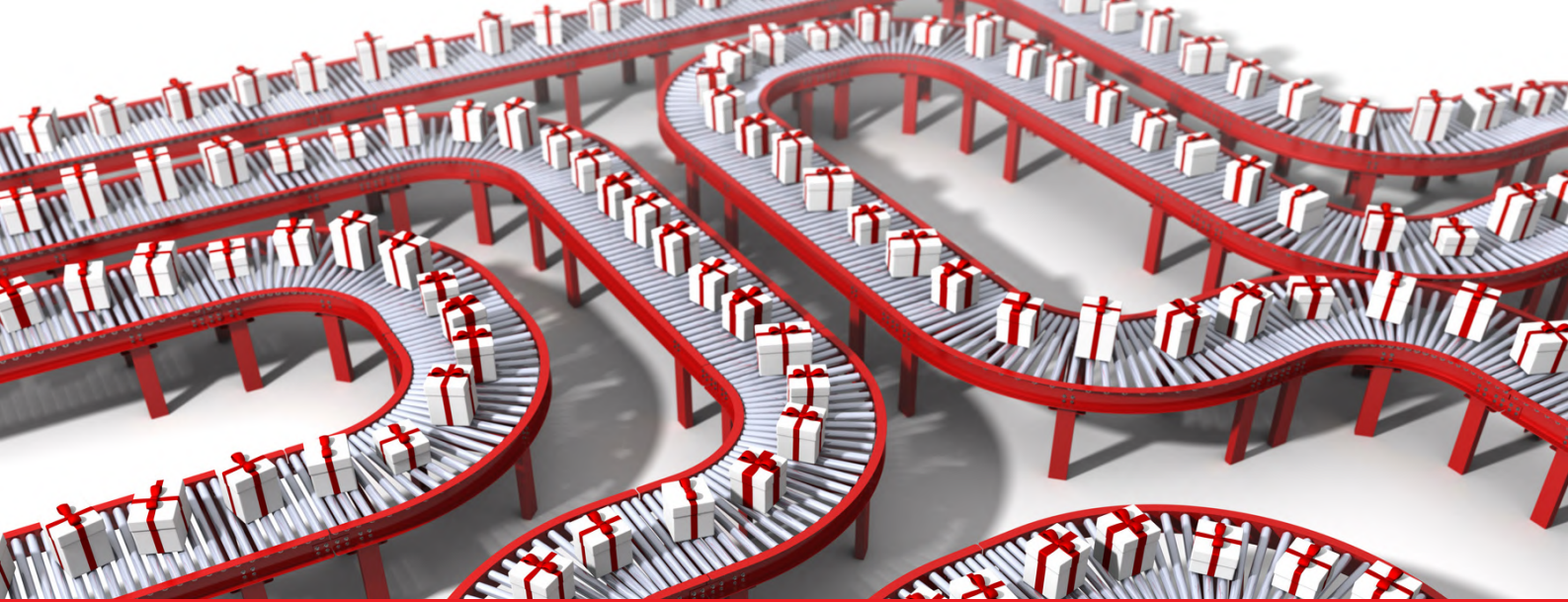
SUPPLIER CASE STUDY: **Peters Membership with** **Roundtable on Sustainable** **Palm Oil (RSPO)**

The Roundtable on Sustainable Palm Oil (RSPO) is an organisation that promotes the sustainable production and use of palm oil. RSPO focuses on environmental and social criteria, including labour rights, addressing concerns related to the exploitation of workers in the palm oil industry.

The organisation sets standards for sustainable palm oil production and encourages companies to adhere to these guidelines through certification processes. This aims to create a more responsible and ethical palm oil industry.

Peter's Food Service, best known for its ice cream - proudly supplied by Chrisco - has been a member of the RSOP since 2012, and publicly committed to their ongoing membership and the values of the RSPO.





Services and goods not for resale (GNFR).

Chisco is aware that our potential modern slavery risks extend beyond the products we source and sell. We also need to consider the services and GNFR we utilise in our daily operations. Many of the services procured by Chisco are supplied in Australia, where there is a lower risk of modern slavery due to government regulations. However, we do recognize the need to assess the potential risks associated with all the services engaged by our business. We have identified that our high-risk service industries include:



Cleaning



Freight
and Logistics



Call Centres



Maintenance



Information
technology



Waste
Management



Graphic design
and printing



Professional
services

To mitigate our exposure to modern slavery risks when engaging service providers, we prioritise reputable suppliers and have established contractual terms in our Supply and Trading Terms Agreement. This outlines our expectations in relation to modern slavery. We assess our risk of exposure to modern slavery in the procurement of professional services to be very low.



FOCUS: **Freight and Logistics**

As a large company with heavy distribution needs, we have carefully reviewed the information published by our major suppliers and carefully reviewed the information provided in our supplier review in relation to the freight and logistics companies that service Chrisco.

This sector is reported to be susceptible to modern slavery risks due to its complex and globalized supply chains. Risks can arise at various stages, including transportation, warehousing, and distribution, all of which are vital to Chrisco's operations. Common risks in this sector include labour exploitation, forced labour, and substandard working conditions, especially in subcontracted or remote facilities.

To mitigate these risks, we have implemented a process of due diligence on suppliers, and regular audits to promote supply chain transparency in our Supply and Trading Terms Agreement.

We acknowledge that this is a major issue to properly identify and address modern slavery risks in the sector and we will work throughout FY24 to gather further worker-related information from logistic and freight suppliers and, where possible, continue to identify any issues of concern.



5. Actions Taken to Address Modern Slavery Risks

During FY23, Chrisco has worked to address our identified modern slavery risks and has taken the following actions to address those risks.

Board Level Commitment

The Chrisco Board is committed to the process of elimination of modern slavery from its supply chains and operations. This commitment includes dedicated training on modern slavery risks for both executive and procurement teams. Additionally, resources are committed to preparing modern slavery statements to meet reporting requirements and to the MSWG, overseen by our Chief Commercial Officer and Compliance Officer.

Update of our Modern Slavery Training

In FY23, we updated our specialised online modern slavery training program tailored for relevant staff. This program focuses on providing updated information about our reporting obligations under the *Modern Slavery Act 2018*, ensuring compliance with local regulations. It includes content on modern slavery legislation and initiatives globally to enhance understanding of risks beyond Australia. This targeted training has been reviewed by executive team members and we are working to roll out this training.

Improving Our Transparency

During FY23 we focussed on our goal of further identifying any modern slavery risks in our supply chain and operations. We continued our review the modern slavery related information published by our first tier suppliers. We also focused on further identifying risks within our freight and logistic operations. This work is ongoing into FY24.

Continued Development of Internal Policies and Processes

In FY23, we continued to roll out corporate and social responsibility policies that included the need for suppliers to proactively address the risks associated with modern slavery practices within their operations and supply chains.

Our Chrisco Supplier Code of Conduct outlines essential requirements for all our suppliers and business partners (including subcontractors and raw materials suppliers). We foster an environment that encourages both staff and suppliers to report any concerns related to modern slavery, as outlined in our Whistleblower Policy so that Chrisco can promptly and appropriately respond to and rectify any compliance concerns.



6. Assessment of Actions Taken

In FY23 we have continued to review published information about our suppliers, including details about their raw material sourcing, factories, workforce, supply chains, and operations. We have concentrated on raising awareness and understanding of modern slavery within our organisation. We updated our modern slavery training module specifically for our purchasing teams with the main goal of the training designed to help our teams recognise signs of modern slavery and encourage them to report any concerns they may come across.

The supplier information gathered over the past few years has given us some insight into our very complex supply chain and our commitment to this process is ongoing.



7. Moving Forward

Moving Towards Improved Transparency

We are aware of the obligation to work towards mitigating and eliminating modern slavery. Over the past year, we've upheld our commitment to ongoing transparency by actively working to gather more information about our supply chain. This process has involved a review and assessment of our supply chain, and we will continue these efforts to enhance transparency further. Our approach will align with the principles outlined in the United Nations' Guiding Principles on Business and Human Rights, specifically by assessing how our business activities may contribute to or be directly linked to modern slavery and how we can prevent these risks within our supply chain.

Responsible Buying Plan

We remain committed to supporting and training our teams to conduct supplier checks. This includes assessing both current and potential suppliers to determine whether the products or services they provide have a high risk of modern slavery.

Our ongoing emphasis on this process ensures that our teams are equipped to make informed decisions, fostering a proactive approach to mitigating modern slavery risks in our supply chain.

Chrisco[®]

**Modern Slavery
Statement FY23**