



## **Contents**



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**Freshmax** 

## **ABOUT US**

The Freshmax Group was established in 1995, with Freshmax Holdings Ltd incorporated on June 29, 1994, in New Zealand. The founders, passionate about the fresh produce industry, began by importing avocados and exporting kiwifruit, later expanding to strawberries and NZ apples.

After establishing a strong presence in New Zealand, Freshmax acquired businesses in Australia and beyond, becoming a leading fresh produce sales and distribution company in the Southern Hemisphere. Today, Freshmax operates in New Zealand, Australia, North America, and South America, focusing on six main fruit export categories from the Southern Hemisphere.

Freshmax has grown with vision a diversification fresh in produce sectors. international coverage, direct supermarket business, and import/export operations, with offices and sites worldwide. Throughout its journey, the company has maintained progressive approach to people and culture.



## **OUR COMMITMENTS**

The group and its subsidiaries and controlled sites are committed to operating ethically and responsibly, ensuring safe working conditions and treating all workers with respect and dignity, while delivering sustainable business growth.

This is the Freshmax Group's fourth Modern Slavery Statement, issued under the Australian Modern Slavery Act 2018 (Cth). It details the steps taken by Freshmax Group Pty Ltd and its subsidiaries to prevent modern slavery within its supply chains and business operations during the 2024 financial year (October 1, 2023 – September 30, 2024). Building on our previous statements, beginning in 2020, this report reflects our growing understanding and expanded mitigation efforts.

For the purposes of this statement, "modern slavery" encompasses slavery, servitude, forced or compulsory labour, debt bondage, deceptive recruiting for labour or services, child labour, and human trafficking. The terms "extended workforce suppliers" and "our extended workforce" refer to both our suppliers and their employees.

#### **Our Values**





## MESSAGE FROM THE GROUP CEO

Freshmax's motto. "People passionate about Produce." our dedication underscores to our workforce. We acknowledge the complexities and inherent modern slavery risks within our diverse supply chain and are committed to continuous improvement in understanding and mitigating these risks through robust processes. We operate with a zero-tolerance policy towards modern slavery, upholding human rights and maintaining ethical and integral business practices. A core objective is the development and implementation of effective systems to address potential modern slavery risks within both our operations and supply chain. The Freshmax Group's Code of Conduct establishes the ethical and legal framework for all employees, and our Modern Slavery Assessment is aligned with these principles across all business units.

We have implemented a Whistleblower Protection Policy, aligned with our core values, to foster a culture of corporate compliance and ethical behaviour. This policy protects individuals who report misconduct, promoting transparency and integrity while deterring wrongdoing. To further support this and other related initiatives, we have created a dedicated People, Culture, Sustainability, Environment, and Quality (PCSEQ) team to provide guidance and support across the organization.

Sincerely, Murray McCallum Group CEO, Freshmax Pty Ltd



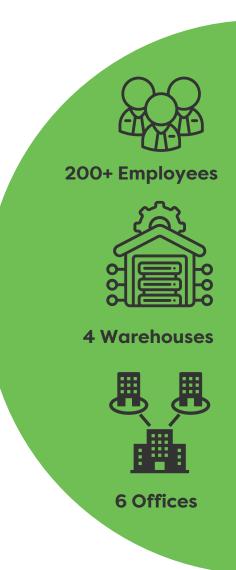
FRESHMAX MODERN SLAVERY REPORT 4

## **REPORTING ENTITY**

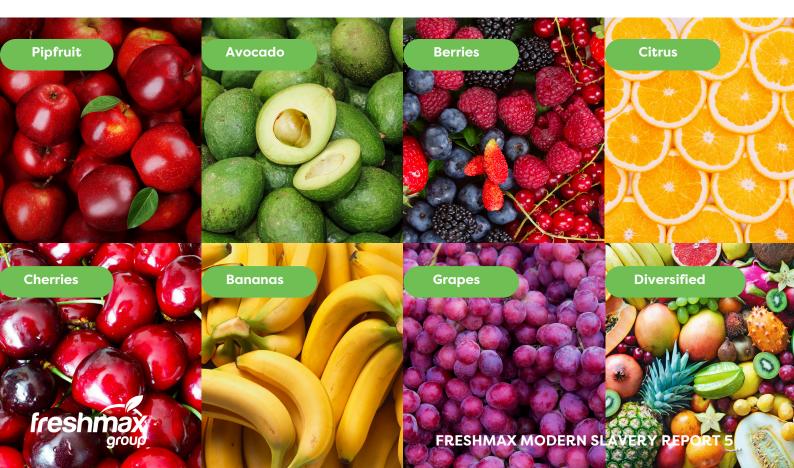
Freshmax, headquartered in Melbourne, Victoria, Australia, operates across five countries: Australia, New Zealand, the United States, Chile, and Peru. We focus on various core categories within the fresh produce industry, including domestic and international supply, as well as value-added services such as treatment, ripening, and prepacking.

Driven by a commitment to innovation and efficiency across the entire supply chain, from field to fork, Freshmax has achieved significant global scale connecting with customers across six of the seven continents.

Freshmax offers a range of fruits and vegetables sourced from Australia, New Zealand, Malaysia, and North & South America. These products are sourced from orchards and farms in these regions, with a focus on quality and ethical practices.



## **Categories of Products Offered**



## **OUR BUSINESS STRUCTURE**



## Freshmax Group

Freshmax
National
Pty Ltd
Australia

Freshmax Australia Pty Ltd Australia Deluca Banana Marketing

**Australia** 

Valleyfresh International

North & South America, Chile & Peru. Innovar Global

Australia

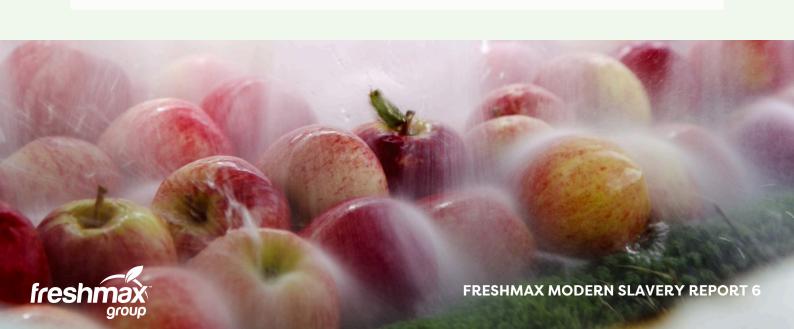
Freshmax National Pty Ltd supplies premiumquality produce to all major Australian supermarkets, and also provides ripening, packing, and consolidation services from its production sites.

FAU's business specialises in supplying high-quality produce to the wholesale & export market. This business also offers trade partners treatment services, including fumigation and ripening.

DBM is one of Australia's largest domestic banana suppliers, with established, long-term supply programs in place with two of the three major national retailers.

This part of the business operates across multiple continents, specializing in exports, & diversified horticultural activities, encompassing **Business Units** such as VF Direct, FMX Export, VF North America, Peru & Chile, & Berry Co.

Innovar
develops
proprietary
varieties like
Modi® Apples,
Piqa Boo®
Pears, King
Midas Plums,
Auro®
Seedless
grapes, and
Tangold
Mandarins.



## **People Passionate About Produce**

At Freshmax, we recognize that fostering strong and mutually beneficial relationships with our trade partners is paramount to our long-term success. By providing exceptional service and exceeding expectations, we solidify these partnerships and contribute significantly to the overall health and sustainability of the Australasian fresh produce industry.

Our commitment to delivering high-quality services extends beyond simply fulfilling orders. We actively seek to streamline the supply chain through:

- Operational Competence
- Value-Added Services
- Open Communication and Collaboration
- Continuous Improvement

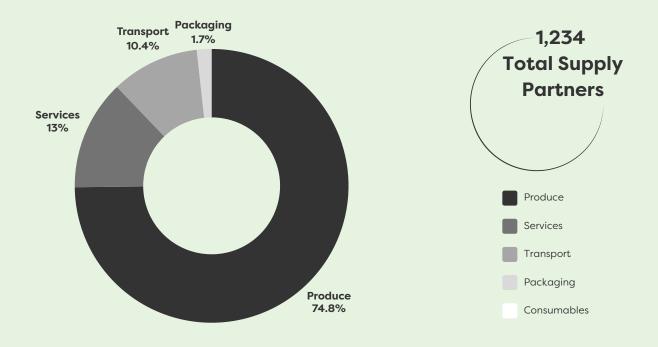
This strategic approach delivers numerous benefits:

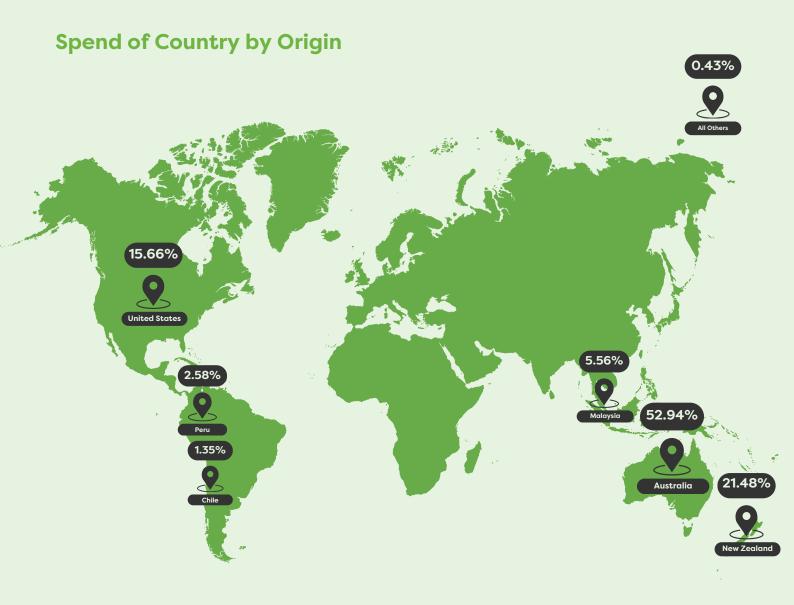
- Enhanced Efficiency: Streamlined supply chains reduce delays, minimize waste, and optimize transportation, resulting in cost savings for all stakeholders.
- Improved Product Quality: Efficient handling and preservation through our services ensure that high-quality produce reaches consumers, enhancing their satisfaction and brand loyalty.
- Increased Trust and Confidence: Consistent service delivery builds trust and confidence among our trade partners, fostering long-term relationships and encouraging continued collaboration.
- Enhanced Sustainability: Streamlined processes and reduced waste minimize the environmental impact of the supply chain, contributing to a more sustainable and environmentally responsible industry.
- Strengthened Market Position: By providing exceptional service, Freshmax strengthens its market position as a reliable and preferred partner within the Australasian produce industry.

In summary, our commitment to providing exceptional service to our trade partners is a cornerstone of our business philosophy. By taking this approach we not only seek to strengthen our own business but also to contribute significantly to the success and sustainability of the entire Australasian fresh produce industry, creating a win-win scenario for all stakeholders.



## **Visual Representation of Supply Categories**







## **MODERN SLAVERY RISKS & UNDERSTANDING**

The 2023/2024 financial year witnessed continued disruptions to global supply chains, characterised by labour shortages, shipping delays, and extreme weather events. To ensure consistent service delivery to our customers, the business sourced products and services from approximately 1234 suppliers globally, with a significant presence in Australia, New Zealand and the USA.

- Recognizing the inherent risks associated with global supply chains, including the potential for Modern Slavery, we have categorized our suppliers into five key areas:
  - Produce.
  - Services.
  - Transport,
  - Packaging,
  - Consumables.
- · Based on industry analysis and the geographic distribution of our supply partners, key potential Modern Slavery risks identified within the horticulture sector and our internal risk assessments include:
  - Forced labour intimidation, threats, use of coercion or fraud:
  - working Excessive working hours unreasonable amount of time beyond a standard work week:
  - Debt bondage payment of recruitment fees and retention of identity documents;
  - Deceptive recruitment practices false job description, misrepresented salary details, hidden work conditions.

We are committed to the continuous assessment of modern slavery risks within our direct workforce and supply chain, with the aim of mitigating these risks and upholding ethical and responsible sourcing standards.





## **Understanding risks continued**

For this reporting period, Freshmax adopted a risk-based approach to identify and mitigate potential Modern Slavery risks within our own sites and supply chain. We utilised independent third-party platforms such as SEDEX, FairFarms, and CENTRL to assess inherent risks and evaluate potential concerns related to Forced Labour, Debt Bondage, Excessive Working Hours and Deceptive Recruitment.

For our directly owned sites, assessments are performed at a minimum annual frequency, or more frequently in the event of business structure or operational changes, or when social audit findings necessitate. The assessment process for our supply partners is initiated upon engagement and maintained through continuous monitoring. Initial risk assessments are based on supplier self-assessments, categorized as High, Medium, or Low risk. The platforms mentioned above provide valuable support to both Freshmax and our suppliers in implementing effective monitoring and remediation strategies to mitigate these risks.

Following assessment, all directly owned sites were determined to present a low risk of modern slavery occurrence. Our supply partners categorised as having high risk in Modern Slavery were found to be in the Produce Category, whereas Low risk partners belonged to both the Produce & Packaging categories. The presence of supply partners across both high and low-risk categories demonstrates the effectiveness of our risk mitigation strategies. This highlights that by implementing robust controls and remediation steps, businesses can significantly reduce the risk of Modern Slavery, regardless of the inherent risks associated with specific sectors.

## **Risk Management Program Partners**









## DUE DILIGENCE, MITIGATION AND REMEDIATION

As part of our ongoing commitment to ethical sourcing, Freshmax has focused on identifying and addressing potential gaps within its supply chain. This includes a continuous review and strengthening of existing internal controls to ensure the highest standards of ethical conduct are maintained throughout the supply chain.

The following framework is utilized for the identification and assessment of potential risks:

Board of Directors					
Group CEO					
Human Rights and Health & Safety Steering Committee					Sustainability
Modern Slavery Working Group					Steering Team
Company CEOs					
Operations	H&S Committee Teams	Supply Chain	Finance	Export	
Imports	Wholesale	Sales	Service Management	People & Culture	



## INTERNAL PROCESSES AND POLICIES

Freshmax has implemented a holistic approach to employee empowerment, encompassing the implementation of company core values and the proactive management of Modern Slavery risks within our business and supply chain.

All employees directly employed by Freshmax are engaged under employment contracts that adhere to the National Employment Standards, the Fair Work Act 2009, and applicable Industry Awards. All employees working at Freshmax warehousing or packing facilities are provided with access to and are expected to comply with all relevant company Policies and Standards:

Policies & Standards			
Title	Objective & Implementation Approach		
Human Rights Standard	The Company's Human Rights standard is based on internationally recognised human rights principles, as a minimum those set out by the International Bill of Human Rights. With his standard, the business embeds our commitment to respect human rights in all business areas and processes by identifying, preventing and mitigating potential adverse human rights impacts that we may cause or contribute to by our business activities. All new team members are required to go through this during their induction process and go through a refresher on an annual basis. This is also published on our internal shared portal accessible by all team members.		
Code of Conduct	This Standard seeks to provide a framework and set out expectations for behaviour of team members. The guidelines outlined in this document, support each of the team members to enjoy working and create confidence in our customers and our supply partners. All new team members are required to go through this during their induction process and go through a refresher on an annual basis. This is also published on our internal shared portal accessible by all team members.		

Title	Objective & Implementation Approach
Whistleblower Protection	Freshmax is committed to promoting a culture of corporate compliance and ethical behaviour in accordance with its core values. This Policy recognises that the protection of whistleblowers is integral to fostering transparency, promoting integrity, and deterring and detecting misconduct & wrongdoing.  The business believes that the best way to fulfil this commitment is to create an environment where team members who have concerns about unacceptable behaviour, misconduct, or wrongdoing, feel safe to report it without fear of reprisal. This standard is designed to complement Freshmax's normal communication channels and is not intended to restrict Freshmax Representatives from raising issues and discussing grievances and concerns with appropriate Line Managers. All new team members are required to go through this during their induction process and go through a refresher on an annual basis. This is also published on our internal shared portal accessible by all team members.
Dispute Resolution	To facilitate a structured resolution where a dispute within the workplace may directly affect an individual staff member, or group of staff members, and may also result in detriment to the company's business or productivity, this standard has been developed and implemented to guide to come up with and effective resolution.  All new team members are required to go through this prior to commencing work and go through a refresher on an annual basis. This is also published on our internal shared portal accessible by all team members.
Sustainability & Ethical Sourcing Policy	In this Policy statement the business outlines its commitment to conduct business ethically with sustainable practices; Freshmax commits to do so whilst respecting people, their welfare and individual human rights. Everyone within the business is accountable for ensuring that our practices remain ethical, and the business is working continually towards a more sustainable future. All team members have access to this standard via company sharing portal.



Title	Objective & Implementation Approach
Anti Bullying and Anti Harassment	The aim of this standard is to provide a workplace where all people can achieve their potential and team members can conduct their normal work duties without fear of intimidation or harassment of any nature. All new team members are required to go through this during their induction process and go through a refresher on an annual basis. This is also published on our internal shared portal accessible by all team members.
Anti Discrimination	The Company has an obligation to provide equal employment opportunities to all employees, or potential employees.  Discrimination on any basis is not condoned by the business and by this standard, the business further shows commitment to provide all persons with an opportunity to present their case for employment or advancement.  All team members have to abide by this standard and have access to it through shared internal portal after going through it during recruitment process. They also go through a refresher on annual basis.
Business Conduct Standard	To succeed in becoming a successful business, requires the highest standards of behaviour from all of our team. The company has earned a reputation for conducting its business with integrity and with respect for the interests of those our activities affect. This reputation is an asset, and this standard supports the business in sustainably conducting the business activities. The team members are required to go through this during their induction process and go through a refresher on an annual basis. This is also published on our internal shared portal accessible by all team members.
Drug and Alcohol	The Drug & Alcohol Standard is in place to ensure that the workplace is free from the adverse effects of drug and alcohol induced performance impairment. All new team members are required to go through this during their induction process and go through a refresher on an annual basis. This is also published on our internal shared portal accessible by all team members and all of them have access to the handouts for easy review.



Title	Objective & Implementation Approach
	Freshmax's overall health and safety objective is to prevent work related injuries or illnesses.
Injury Management & Return to Work	In the event of a work-related injury or illness occurring, Freshmax is committed to providing a safe and early return to work in the best interest of all workers. This standard outlines the methodology & guides the business to ensure the return to work obligations are met with worker's wellbeing as a priority. All team members have access to this standard via company sharing portal.
	The Company is committed to ensuring that it complies with all 13 Australian Privacy Principles (APPs) set out by the Privacy Act. These principles regulate the way the Company can collect, use, disclose, amend and pass on personal information.
Privacy in Workplace	All new team members have access to this during their induction process and go through a refresher on an annual basis. This is also published on our internal shared portal accessible by all team members.
Protected Disclosure	The aim of the policy is to ensure that the Company operates an appropriate internal procedure for receiving and dealing with information about serious wrongdoing in or by and one inside or associated with the Company in accordance with the provisions of the Public Interest Disclosure Act 2013 in Australia and the Protected Disclosures Act 2000 in NZ. All new team members have access to this during their induction process and go through a refresher on an annual basis. This is also published on our internal shared portal accessible by all team members.
Health Safety & Environment Policy	In this Policy statement the business outlines how it aims to deliver on the accountability and care towards people and environment. Freshmax cares about people, community, natural world, lands, rivers, and oceans and all they contain. The business is committed to doing business in a safe and responsible manner and minimising its environmental impact. Freshmax is accountable for working safely, caring for those around us and minimising its impact on the environment. All team members have access to this standard via



company sharing portal.

Title	Objective & Implementation Approach
	The purpose of this policy is to establish procedures and guidelines for Employees who wish to take personal (sick or carers) leave as per Fair Work guidelines.
Leave Policy	All new team members have access to this during their induction process and go through a refresher on an annual basis. This is also published on our internal shared portal accessible by all team members.
	The company is committed to promoting safety and responsible use from all of its team members.
Mobile phone and Device	To ensure that this commitment is followed through, the company has adopted a mobile phone policy that requires all individuals to operate company phones and devices in a manner that ensures the professional conduct, including not using phones in moving cars, forklifts or machinery if not fitted to an approved hands free system.
	All new team members are required to go through this during their induction process and go through a refresher on an annual basis.  This is also published on our internal shared portal accessible by all team members and all of them have access to the handouts for easy review.



#### EMPLOYEE WELLBEING

To demonstrate its continued commitment to employee well-being, the business has implemented the following initiatives:

- Workplace H&S: To enhance employee engagement and improve overall health and safety, the group has engaged with a Health & Safety Advisor to review and update its management plan. This has resulted in the implementation of ten key projects within the first year, including comprehensive training programs delivered in multiple languages to suit the diverse needs of our workforce.
- Wellbeing Calendar: This initiative promotes employee well-being through the regular dissemination of informative infographics and the organization of engaging activities.
- Employee Surveys: Freshmax conducted an employee survey previously, and the results were instrumental in identifying key areas for improvement. Based on these insights, we are currently reviewing the survey format to enhance its effectiveness for future surveys. The next employee survey is planned for Q3 2025, and the findings will be used to further refine our employee engagement strategies.









## A CONTINUED FOCUS ON WELLBEING

During the 2023/2024 reporting period, Freshmax Group employed over 200 full-time equivalent employees. Additionally, 48 team members were sourced through 3 different labour hire providers, and 11 contract workers were engaged.

All workers were verified to have a contract of employment. Focusing this year towards safety of our team members, the Group has put in efforts in reviewing and re-developing our Safety systems. This included having a dedicated team reviewing and updating our Standards and Standard Operating Procedures and the business investing in implementing an intuitive cloud based EHS system to drive team member participation and leadership.

## **Case Study:**

Post Ethical Sourcing Audit of one of our sites in Australia, the Group prioritised a review of its labour hire provider compliance to ensure the well-being of all team members, including those engaged through external agencies, was being appropriately addressed.



#### **EXTERNAL SUPPLY CHAIN PROCESSES**

Freshmax is committed to upholding the highest ethical standards throughout our supply chain. To demonstrate this commitment, all directly controlled warehouses in Australia are registered with SEDEX and have undergone rigorous assessments, including completion of a Self-Assessment Questionnaire (SAQ) and a minimum of one SMETA 4-pillar audit within the past 12 months.

A total of 87 social audits were conducted during this reporting period throughout the supply chain, which identified the top five key areas for improvement. The Freshmax team is actively working with our suppliers to address these findings and enhance ethical compliance across our entire supply chain.

To further strengthen our commitment to ethical sourcing, we have developed a Supplier Code. This Code outlines our expectations for all suppliers, emphasizing the following core principles:

- Compliance with all applicable laws and regulations.
- Confidentiality of all business information.
- Fair and ethical treatment of all employees.
- Zero tolerance for forced labour, child labour, and human trafficking.
- A safe and healthy working environment free from discrimination, harassment, and any form of abuse.
- Respect for employees' right to freedom of association and collective bargaining, consistent with local laws.

The Supplier Code also includes a mechanism for the anonymous reporting of suspected violations, ensuring that all concerns can be raised and addressed effectively.

## REMEDIATION

Upon identification of any nonconformances through our due diligence process, we will take immediate action to address them.

In the event of any instances of suspected or confirmed Modern Slavery, we will implement comprehensive remediation measures and investigate the root causes of these occurrences.



**SUPPLIER CODE** 







# ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Freshmax is committed to continuous improvement in its human rights practices. We are actively evaluating the effectiveness of our existing initiatives and identifying opportunities for enhancement across all aspects of our business.

In 2023-2024, we significantly increased engagement with Tier 1 suppliers. By leveraging platforms like Sedex, FairFarms, and CENTRL, we gained deeper insights into potential modern slavery risks and identified opportunities to improve working conditions for workers throughout the supply chain.

Furthermore, an annual self-assessment questionnaire was implemented to identify areas for improvement within our own operations. These combined efforts have provided valuable data that will inform the development of a comprehensive supply chain mapping strategy in the coming years.

The Freshmax Framework is designed to monitor and evaluate the effectiveness of our systems for control of Modern Slavery Risks:





Governance	<ul> <li>Self-Assessment Questionnaire (SAQ)</li> <li>Risk assessments</li> <li>Internal Audits</li> <li>People &amp; Culture Committee</li> </ul>	
Risk Management	<ul><li>Site Audits</li><li>Supplier Audits</li><li>Communication and Acknowledgement</li><li>Training participation</li></ul>	
Monitoring	<ul><li>Whistle-Blower Policy</li><li>Complaints &amp; Investigation</li></ul>	
Grievance Mechanism	<ul><li>Whistle-Blower Policy</li><li>Complaints &amp; Investigation</li></ul>	

Freshmax maintains an established Approved Supplier Program that necessitates ongoing review of our entire supply chain. During this reporting period, relevant teams conducted thorough reviews of all supplier memberships, ensuring timely completion and updates of Self-Assessment Questionnaires (SAQs).

Additionally, we verified the completion of third-party audits and ensured timely closure of any identified non-compliances to local law. The outcomes of these reviews were promptly communicated to relevant teams within the organisation.

Furthermore, we are pleased to report that 87 of our Tier 1 Suppliers who have undergone independent social audits have endeavoured to address any identified non-compliances, demonstrating their commitment to meeting International Labour Organization (ILO) standards within audit scope.



## PROCESS OF CONSULTATION

Freshmax is committed to a collaborative approach to addressing modern slavery risks throughout our operations and supply chain. This commitment is reflected in the development of this statement, which was achieved through collaboration between representatives from Procurement, People & Culture, Legal, Ethical Sourcing, and Operations.

This statement has undergone rigorous review and approval processes, including evaluation by the Modern Slavery Working Group, the Group CEO, and the Freshmax Board of Directors.

Throughout the reporting period, the Modern Slavery Working Group actively engaged with various business units to gain a deeper understanding of the specific modern slavery risks associated with their respective operations, considering factors such as geographical location and operational diversity. This collaborative approach has enabled us to develop targeted strategies to mitigate these risks effectively.

## ADDITIONAL INFORMATION

Despite facing industry-wide challenges such as labour shortages, shipping delays, and extreme weather events, Freshmax has made significant strides in achieving positive business outcomes.

With increased employee engagement and enhanced employee wellbeing through our introduction of the plan for 10 key Health & Safety projects across the group in Australia, the Group has fostered a strong sense of trust and empowerment among our team members. This initiative along with successful implementation of the Grievance Mechanism has played a crucial role in driving business growth and sustainability.

By proactively assessing Modern Slavery Risks within its operations and supply chain, the Group has demonstrated a commitment to continuous learning and improvement, further reinforcing our vision of a sustainable and ethical business.





## **LOOKING AHEAD**

We are proud of the progress made in understanding and addressing Modern Slavery risks within our supply chain. However, we recognize that this is an ongoing process. We are committed to continuous improvement and will actively seek collaboration and support from both internal and external stakeholders to further enhance our efforts.

## SYSTEM & REPORTING

The Modern Slavery Working Group is committed to continuous improvement. In the coming year, the Group will:

- Re-evaluate the Psychological Health and Wellbeing Standard: This review will inform the relaunch of employee surveys to better identify and address key employee well-being concerns.
- Continue producing the company Sustainability Report: This report will be developed in collaboration with internal stakeholders and key supply partners.
- Review and update internal Policies, Standards, and Standard Operating Procedures (SOPs): This review will ensure our internal processes align with the evolving needs of a sustainable and responsible business.





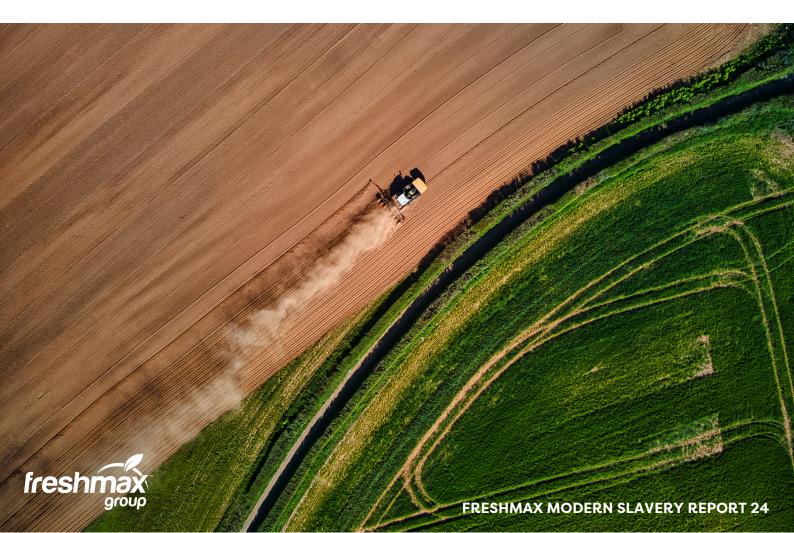
#### TRAINING AND COMMUNICATION

Freshmax is committed to continuous improvement, guided by our core values and the four pillars of our Group vision: 'better for our people,' 'better for our suppliers,' 'better for our customers,' and 'better for our company.'

To uphold these commitments, we will:

- Enhance Employee Awareness and Empowerment:
  - Continue offering English language classes to non-English speaking employees in Australia to improve workplace communication and understanding.
  - Deliver comprehensive Health & Safety training programs in multiple languages to suit the diverse needs of our workforce.
- Strengthen Internal Communication: Ensure all employees have access to and understand company Policies, Standards, and other relevant documentation.
- Review and Update Training Programs: Conduct a thorough review of our internal training programs, including defining specific frequencies and updating content to address evolving industry needs and best practices.

By implementing these initiatives, Freshmax will foster a positive and inclusive work environment while upholding the highest standards of ethical and sustainable business practices.





## **APPROVAL OF STATEMENT**



This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth) (the Act) for the year ending September 30, 2024. This Statement was approved by the Board on the 27th of March 2025.

This statement has been approved by

Murray McCallum Group CEO, Freshmax Group Pty Ltd

