



2021
MODERN SLAVERY
STATEMENT

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Introduction

Freshmax Group Pty Ltd and its subsidiaries and controlled entities are committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible ethical operations.

Freshmax Group's Code of Conduct provides an ethical and legal framework for all our employees. Our Modern Slavery Assessment aligns to the principles of the Code of Conduct and applies to all businesses.

Freshmax has a zero-tolerance approach to modern slavery, and we are committed to respecting human rights and acting ethically and with integrity in all our business dealings and relationships. Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains is one of our key focus areas.

We are issuing this statement pursuant to the Australia Modern Slavery Act, which requires Freshmax Group Pty Ltd and certain of its subsidiaries to disclose efforts to ensure that modern slavery is not taking place in our supply chains and business operations. This is our second statement, covering our 2021 financial year (October 1, 2020 - September 30, 2021).

Throughout this statement, we reference "modern slavery," which includes slavery, servitude, forced or compulsory labour, debt bondage, Deceptive recruiting for labour or services, child labour and human trafficking. In addition, we reference "Extended workforce suppliers" and "our extended Workforce," which includes suppliers and supplier employees.

About Us

STRATEGY

Freshmax Group is one of the largest specialised international fresh produce groups operating in the Southern Hemisphere.

The corporate head office for the group is in Derrimut, Victoria Australia since 2020.

The Group's strategy is based on management's vision for delivering a specialist international platform for long term sustainable value to stakeholders.

The strategy is based on fundamental strategic growth drivers:



International Capability and reach underpinned by investment partnerships in key supply regions.



Supply security: Portfolio of supply procurement in both Australasia and across key counter seasonal hubs.



Innovation of portfolio of Intellectual Property (IP) brands, building increased supply security



Core category specialisation



Sustainability

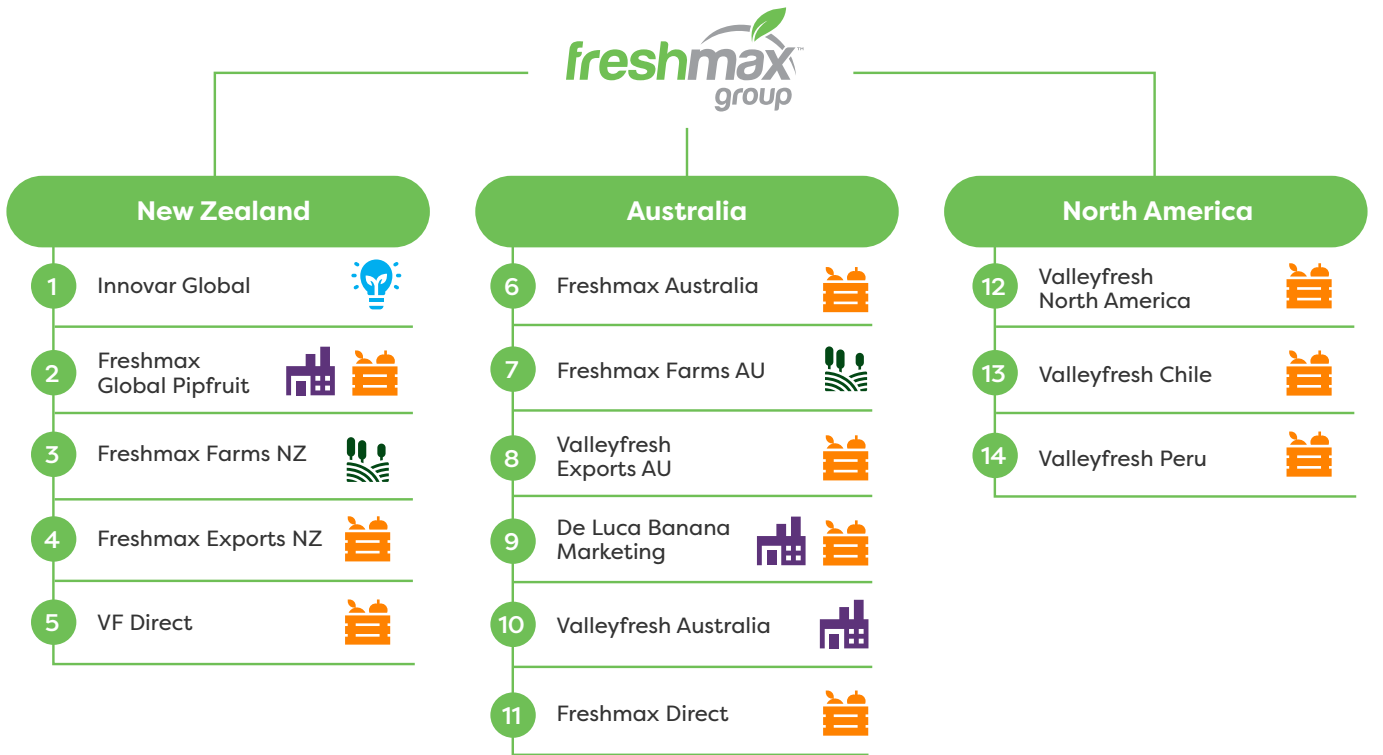






People

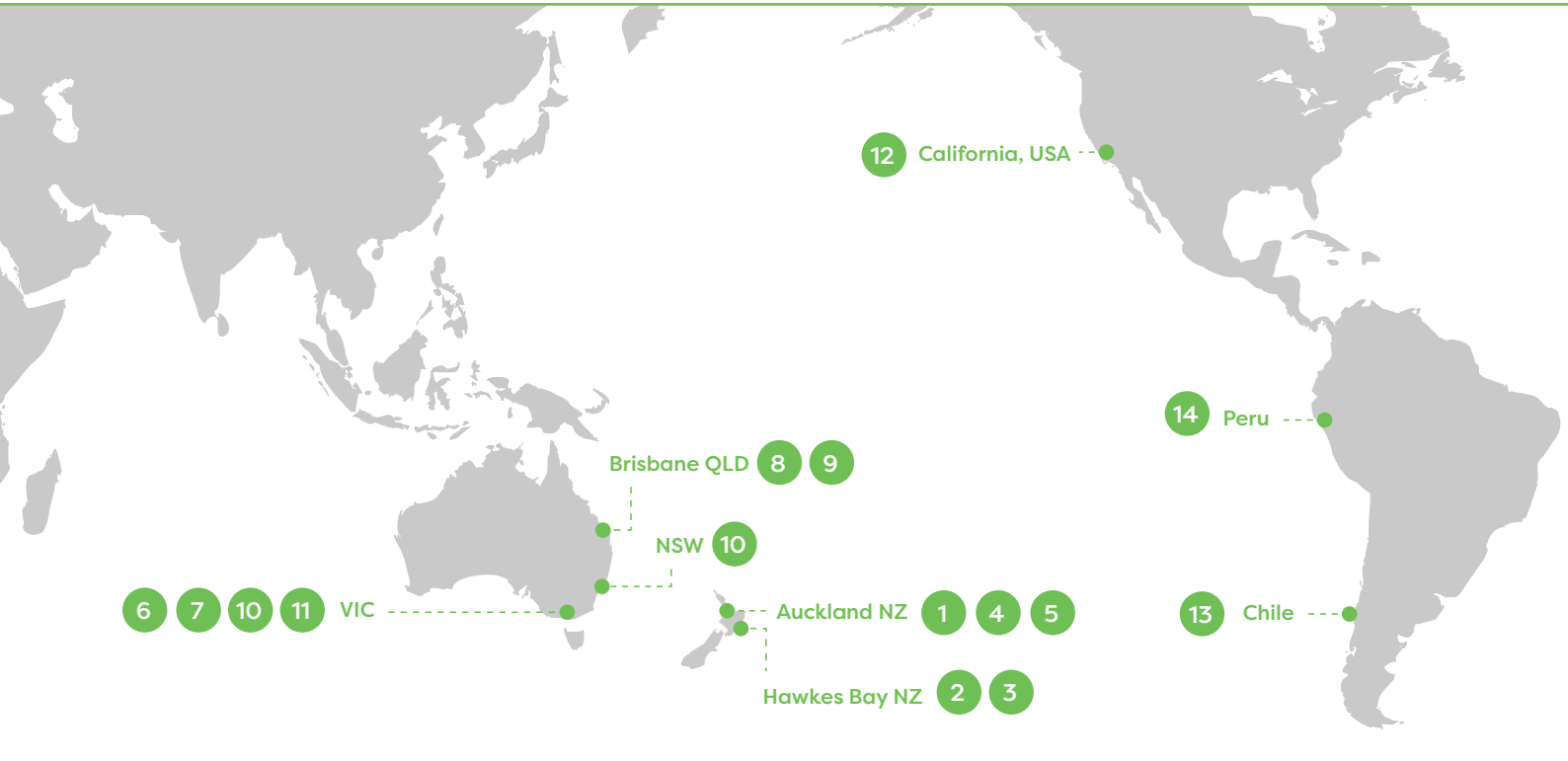
The success of our strategic goals is dependent on our partners, suppliers, and growers meeting our high ethical and human rights standards. Any new or existing supplier/growers are required as part of annual assessment to agree to our Modern Slavery Act (Anti-Slavery and Human Trafficking) Policy.

STRUCTURE & OPERATION

The governance of Freshmax Group is split across Australia (AU), New Zealand (NZ) and North America, Chile & Peru. The New Zealand and Australian operations and supply chains fall into the following categories:



 **Primary Production** - farm supply
  **Packhouses** - packing and distribution
  **Trade** - importing and exporting of products
  **Innovation** - new variety & intellectual property development



Risks of Modern Slavery Practices

Freshmax's operations as a group are spread across multiple continents, whereby we source produce from Australian, New Zealand, USA, Chile, Mexico, Spain, Argentina, Malaysia, and Peru; all of our supply partners in turn have their own supply chains.

We recognise that modern slavery risks can occur both in our operations and supply chain given the substantial number and geographic diversity of stakeholders.

Types of Modern Slavery Risks associated with the horticulture industry and the geographic spread of the business have been identified as follows:

1. Forced labour
2. Debt Bondage
3. Deceptive recruiting for labour or services
4. Child Labour
5. Unsafe working conditions

In the horticulture sector, the above-mentioned types of Modern Slavery have been identified owing to high dependence on migrant workers. Many of these workers encounter language barriers which potentially inhibit their awareness of their rights, exposing them to the risks of Modern Slavery.

The sector relies on these migrant workers for specific tasks that are seasonal in nature, primarily picking and packing. They are hired on a casual and/or temporary basis; directly or through a labour hire agency.

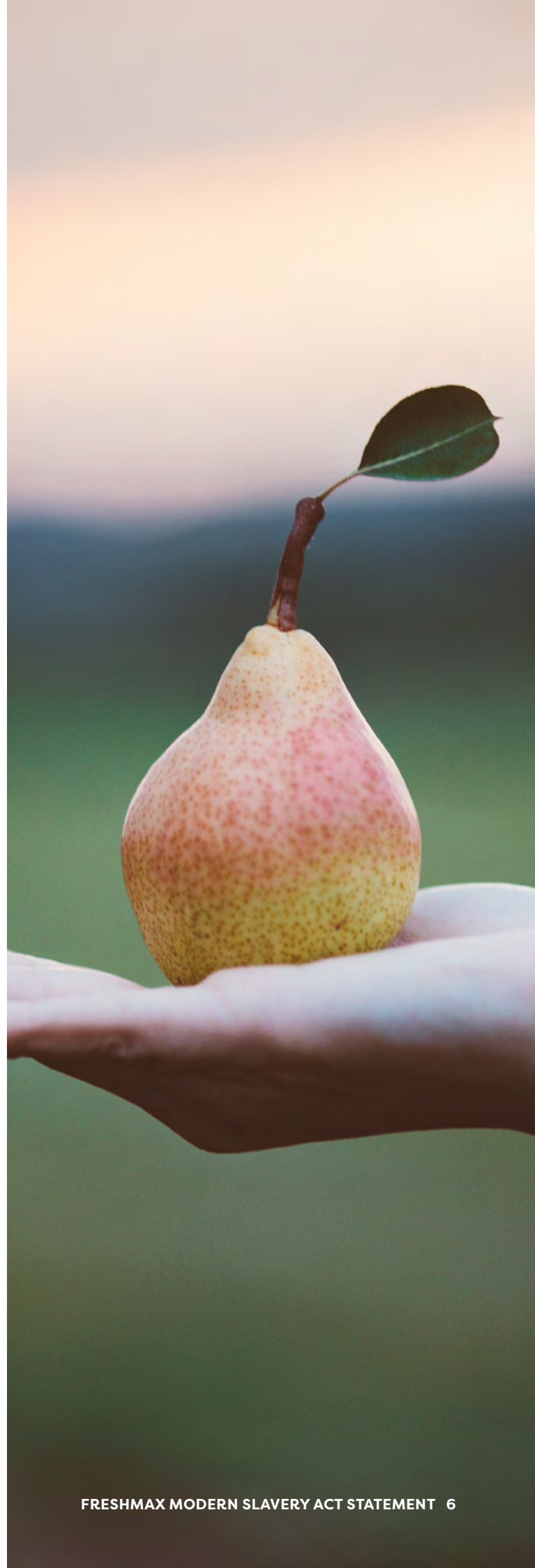
Freshmax has strict policies, procedures and controls to ensure compliance with the applicable local requirements for all its direct employees and hence the risk of modern slavery occurring is low. However, Freshmax acknowledges that it depends on the widespread support from supply chain partners for supply of produce and services to be able to successfully trade and thrive. These may include providers of other goods and services of cleaning, security, transport, freights, etc.

Modern Slavery Risks, Due Diligence and Remediation

Freshmax Group has a Continuous Improvement Program in place and assessing and addressing all identified Modern Slavery Risks forms an integral part of this plan. The Continual Improvement Program is reviewed on regular intervals to assess its effectiveness and relevance to the ever-emerging industry and sector.

As identified below, we have in place systems to:

- Identify and assess potential risk areas in our supply chain
- Mitigate the risk of slavery occurring in our supply chain
- Monitor potential risk areas in our supply chain
- Protect whistle-blowers



OUR GOVERNANCE STRUCTURE

The following structure is in place to identify and assess potential risk areas:



POLICIES

The following policies aimed at mitigating the risk of slavery occurring in our supply chain are available for all employees and relevant interested parties on intranet, company share drive, and hard copies. All Freshmax’s direct employees also have access to and are aware of ETI Base Code, which is an internationally recognised set of labour standards based on ILO conventions.

Company	Business Conduct Policy
Employment	Ethical Sourcing Policy
Health & Wellbeing	Human Rights Policy
Use of IT	<ul style="list-style-type: none"> Anti-bullying & anti-harassment Policy Anti-discrimination Policy Code of Conduct Dispute Resolution Policy Equal Opportunities Policy Leave Policy Privacy in Workplace Policy Protected Disclosure Policy Smoke Free Workplace Drug & Alcohol Policy Whistle Blower Policy Employee Assistance Program Covid 19 Mobile phone & Device Policy Emails & Internet Use Policy Health & Safety Policy
Safety	Health & Safety Management System

RISK ASSESSMENT, DUE DILIGENCE AND RESPONSIBLE SOURCING PROGRAM

At Freshmax we have taken a risk-based approach in developing the Ethical Sourcing Policy. The group uses SEDEX, FairFarms and CENTRL as management tools to improve responsible practices in our supply chain.

These tools are used to assess risk in our own business and our supply base to assess the risk associated with Forced Labour, Debt Bondage, and Deceptive recruiting for labour or services. They also help with monitoring and implement any remediation needed.

Currently, 100% of Freshmax's directly controlled packhouses in Australia are registered with SEDEX, have completed a self-assessment questionnaire (SAQ) and have gone through a SMETA 2 pillar audit as a minimum.

Of all the suppliers of produce, packaging, logistics, and goods & Services, 120 were approached through the SEDEX portal and 133 through the CENTRL portal.

This was made possible by requesting our direct supply partners use the above-mentioned tools/platforms to complete a questionnaire and then performing a risk assessment on the answers.

Of the fifty-one supplier sites that have gone through a Responsible Sourcing Audit, thirty-eight sites have had theirs for this reporting period. These audits are primarily focused on labour and health and safety and are undertaken by independent second- or third-party certification body. There are more sites scheduled for audit over the next reporting period owing to the seasonal factor, the challenges faced due to pandemic and availability of qualified auditors.

Thereby, in 2021, Freshmax has progressively taken steps in further understanding the complexities and challenges within our supply chain and communicated the following to our direct supply partners:

- The content and purpose of the Modern Slavery Act that has been enacted in Australia and make it the basis for future collaboration.
- Steps taken by our direct supply partners to identify, assess and address any Modern Slavery risks within their business.
- Confirm if our direct suppliers have completed, or have a plan to conduct any ethical/responsible sourcing audits or other similar accreditations

TRAINING AND COMMUNICATION TO MITIGATE RISK

Owing to the challenges faced because of pandemic, opportunities for in person training have been limited. Freshmax has taken this opportunity to think outside the box and used variegated methods to effectively communicate the importance of understanding of the risks associated with operations and site-specific Modern Slavery and steps taken to mitigate the same.

Some of these are as follows:

1. Introduction of a Health & Safety message boards across all our packhouses in Australia.
2. Communication of the ETI base code and internal Health & Safety policies & procedures across all Australian Pack houses through bulletin boards, toolbox talks, posters, and online video meetings.
3. Introduction of independent Whistle-blower hotline across all packhouses within Australia to support the internal Whistle-blower policy. Thereby, empowering the team members across Australia to report suspected misconduct, including but not limited to forced labour. The information was communicated in various languages best understood by all the team members for efficacious implementation and empowerment.
4. Members of the Modern Slavery Working Group and the company CEOs were trained in Modern Slavery Act requirements specific to our sector, operations, and geographic location.
5. Relevant team members that deal directly with our supply partners and major stakeholders, were trained in company Ethical Sourcing Requirements along with internal policies and procedures set in place for successful implementation of the same.
6. Training was completed for all employees in Australia for all the above-mentioned policies.
7. Freshmax Group Values – survey was rolled out in Australia.
8. Planning for Employee Wellbeing survey has been completed and will be rolled out in the next Financial Year.

REMEDATION

We will continue to strengthen our approach to managing risk of Modern Slavery within our business and supply chain, and ensure our strategy is responsive to changing risks. We will act indeterminately to addressing mistreatment or non-conformity in safety or welfare standards. Where we identify instances of modern slavery, we will ensure remediation and address the cause.

Assessing the Effectiveness of our Actions

Freshmax is striving continually to understand and assess the effectiveness of the initiatives outlined in this statement and identify opportunities for improvement in broader activities and initiatives taken across the business that impact human rights to develop a plan and framework for ongoing assessment.

Currently, the following practices are used to measure our performance:

Governance	<ul style="list-style-type: none">• Modern Slavery Working Group• Review of internal Policies and Procedures• Board Reporting
Risk Management	<ul style="list-style-type: none">• Internal Audits• People & Culture Committee
Monitoring	<ul style="list-style-type: none">• Self-Assessment Questionnaire (SAQ)• Site Audits• Supplier Audits• Training participation
Grievance Mechanism	<ul style="list-style-type: none">• Whistle-Blower Policy• Complaints & Investigation

Process of Consultation

Freshmax as a group is committed to development of a collaborative approach to address the risks associated with Modern Slavery.

This statement was developed in partnership with an interdepartmental and inter-company group consisting of representatives from Procurement, People & Culture, Legal, Ethical Sourcing and Operations.

All these representatives have convened during the reporting period to discuss and develop the actions mentioned in this statement. This statement has been reviewed by our Modern Slavery Working Group and has been approved by the Group CEO and the Freshmax Board members.

Throughout the reporting period, members of the Modern Slavery Working Group have worked closely with different businesses within the group to better understand and mitigate the specific Modern Slavery risks faced by each of these businesses based on their different geographical locations and operational diversity.

Additional Information

Freshmax Group respects and acknowledges the work being done by major Australian Retailers in paving the pathway for addressing risks associated with modern slavery.

We work hand in hand with our retail stakeholders to ensure mitigation actions and processes implemented are effective to prevent human rights violation and prevent modern slavery incidents. With keeping the ideals of equity, Freshmax proudly supports the continuous improvement in Fresh Produce sector brought along by efforts of these major retailers and other organisations such as Australian Fresh Produce Alliance, which Freshmax is an active member of.

The roll out of the Whistle-Blower Policy by the group in Australia has gained the trust of and empowered the team members that help the business not only sustain but also grow leaps and bounds. The actions taken by the Group to endeavour to assess the Modern Slavery Risks within its operations and supply partners (including but not limited to produce, logistics, goods and services) have only strengthened the vision of achieving a consistent continuous improvement program.

Looking Ahead

Freshmax will continue working towards Continuous Improvement, keeping in mind the four pillars of the group vision: for the better of our people, better for our suppliers, better for our customers and better for our company.

The group commits to:

- Continue developing a system to measure effectiveness of our mentioned actions;
- Develop an internal expansive Ethical Sourcing Program;
- Expand the Whistle-Blower Policy roll out to all of Australia;
- Expand the Continuous Improvement Program to reach our relevant interested parties outside Australia; and
- Provide further training in relation to Ethical Sourcing, Human Rights and identifying Modern Slavery Risks.

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth) (the Act) for the year ending September 30, 2021.

This Statement was approved by the Board on 3 March 2022.

This statement has been approved by



Murray McCallum
Group CEO, Freshmax Pty Ltd