

Modern Slavery Statement 2023-2024

REVISED VERSION FOR SUBMISSION

SPC GLOBAL LTD & SPC OPERATIONS PTY LTD

A JOINT MODERN SLAVERY STATEMENT FOR THE SPC GROUP

REPORTING PERIOD: 1 JULY 2023 TO 30 JUNE 2024

REVISED VERSION FOR SUBMISSION (May 2025)

*ONE OF AUSTRALIA'S LEADING AGRIBUSINESS COMPANIES,
PROVIDING HIGH QUALITY, HEALTHY FOOD AND BEVERAGE
PRODUCTS*

Modern Slavery Statement 2023-2024

REVISED VERSION FOR SUBMISSION

Reporting Entity and Structure

This Modern Slavery Statement is made pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the **Act**) for the period of 1 July 2023 to 30 June 2024 (the **Reporting Period**).

This statement has been prepared by SPC Global Ltd (ACN 633 389 394) and is a joint statement under section 14 of the Act made on behalf itself and its wholly owned subsidiary, SPC Operations Pty Ltd (ACN 633 532 162). SPC Global Ltd and SPC Operations Pty Ltd are reporting entities under section 5 of the Act.

The Modern Slavery Statement describes the risk of modern slavery in SPC's own operations and our supply chain for the Reporting Period. It outlines actions taken by SPC to assess and address the risks and explains how we evaluate the effectiveness of these measures. The term 'modern slavery,' as used in this Statement, takes the meaning given to it in the Act.

Introduction to SPC

SPC, a cherished 100-year-old Australian brand is the oldest and last Australian-owned fruit and vegetable processor. Since 1918, it has been bringing a diverse array of Aussie-grown produce to tables across the country, including stone fruit, tomatoes, and beloved favourites such as our SPC Baked Beans and Spaghetti.

At SPC, for the Reporting Period, our overarching goal was 'Creating better food for the future.' Anchored in our Values, which form the cornerstone of our corporate policies and procedures, this objective reflects our unwavering commitment to conducting business with integrity and in an ethical and transparent manner.

SPC Values



Safety first



Open for business



Risk smart



Care about our communities and environment



Agility and speed



Roll our sleeves up

Modern Slavery Statement 2023-2024

REVISED VERSION FOR SUBMISSION

Our Brands and Products



We manufacture and market a diverse range of food products under the umbrella of cherished household brands. SPC, Goulburn Valley, and Ardmona stand as three of Australia's recognisable and trusted brands within our portfolio. The diverse product range at SPC includes processed deciduous (tree-ripened) fruit, tomatoes, beans, and pasta products. SPC's products are available in Australia and New Zealand.

Operations and Supply Chain

SPC is dedicated to promoting a workplace where our employees feel safe, supported, and valued. We actively promote inclusivity in our working environment and hiring practices, placing a strong emphasis on gender diversity and equal opportunities for all employees.

SPC's headquarters are in Melbourne, and its largest manufacturing site is situated in Shepparton, within the Goulburn Valley region of Victoria. The Shepparton facility comprises a manufacturing plant, the National Distribution Centre (NDC), quality control and testing laboratories, training facilities, conference spaces, and administrative offices. Additionally, SPC operates manufacturing facilities in Ardmona, dedicated to the production of pomegranates. SPC also employs quality specialists based in Thailand and a Sales Team based in Singapore.



Modern Slavery Statement 2023-2024

REVISED VERSION FOR SUBMISSION

Risk of Modern Slavery Practices in Our Operations

SPC adopts a risk-based approach to modern slavery due diligence in our operations and supply chain, with a primary focus on the human rights of our employees, contractors, and those employed by our suppliers.

During this Reporting Period, SPC assessed the actual risk of modern slavery in our operations as low. This determination is based on the following initiatives and measures:

- The majority of SPC team members are directly employed by SPC, and their employment contracts adhere to and comply with relevant Federal and State laws.
- SPC maintains a dedicated team of People and Culture specialists responsible for overseeing compliance with regulatory requirements related to the working conditions and pay of our team members.
- SPC team members actively engage with and often hold memberships in unions, affording them the freedom to collectively negotiate working terms and conditions. If necessary, third parties, such as unions, can participate in these negotiations.
- SPC monitors the risk of modern slavery in our operations through regular employee engagement surveys and the assessment of grievances raised by team members. The People and Culture team, along with a 24-hour anonymous whistleblower helpline, facilitates this process.
- SPC respects the freedom of choice for employers, employees, and independent contractors regarding their decision to join a union or employer association or to participate in organised industrial activities. This commitment to freedom of choice is embedded in our approach to labour relations.

Risk of Modern Slavery Practices in our Supply Chain

SPC collaborates with approximately 800 goods and services suppliers. Our operational framework encompasses raw ingredients suppliers, packaging suppliers, cleaning and security services, transport and logistics providers, waste disposal companies, and professional services such as advertising agencies. The vast majority of these suppliers are local to our manufacturing facilities and head office, which allows close collaboration and monitoring of the people and processes within supplier organisations. SPC regularly conducted visits to suppliers to assess first-hand the suppliers against its Modern Slavery Policy requirements.

Over 90% of the ingredients utilised by SPC during the Reporting Period were sourced from Australia, predominantly from the Goulburn Valley, and processed at our Shepparton facility. Additionally, our partnership extended to 130 growers, reflecting the integral role they play in our supply chain and the overall success of our operations. While our primary objective is to maintain SPC as an Australian-owned entity and support local growers and the Shepparton community, there are instances when we import produce due to unavailability from local sources.

This collaborative approach underscores our dedication to fostering strong relationships and ensuring the sustainability of our business ecosystem.

Modern Slavery Statement 2023-2024

REVISED VERSION FOR SUBMISSION

SPC requires all of our suppliers to grant us access to the Supplier's Self-Assessment Questionnaire (SAQ) and SMETA information. Based on a review of the information available, each supplier is categorised as low, medium, or high risk based on several factors, including geographical location (with a focus on known high-risk countries), the type of goods and services supplied.

For the Reporting Period, SPC conducted a risk assessment of its raw material suppliers to assess its modern slavery risk profile using information gathered via the above mechanisms. The profiling is based on the Modern Slavery Index 2023.

In summary, during the Reporting Period:

- 50% of SPC suppliers are in a very low risk rating country
- 39% of SPC suppliers are based in a medium risk country
- 1 supplier is based in a medium/high risk country – Philippines
- Of the top 5 at risk countries – Philippines, Madagascar, Egypt, Guatemala and India - only one country has featured in the SPC supply chain during the Reporting Period.

Our review during this Reporting Period did not result in a high-risk classification for any of the suppliers, and no direct examples of modern slavery practices were identified in our supply chain.

SPC understands the importance of ongoing monitoring of all of our suppliers and continues to monitor through our established due diligence process for each supplier engaged directly and indirectly. This is completed as part of the regular supplier and contract review and renewal processes.

Effectiveness of the risk assessments and follow up actions

During the Reporting Period, SPC measured the effectiveness as follows:

- Monitored the number of modern slavery reports including number of Stopline disclosures received (including on website and Supplier Code of Conduct Policy and Declaration)
- Sedex Risk assessment on modern slavery non-conformances
- SMETA Audits and non-conformance related to modern slavery
- Modern Slavery Risk assessments, particularly in relation to suppliers based in high-risk countries.

SPC is satisfied that its review and assessment processes were effective based on the resources available. However, SPC recognises that this is a constantly evolving area requiring close monitoring and process improvements. SPC will continue to monitor the effectiveness of its risk assessment processes and its actions in the next Reporting Period via a dedicated working group.

In addition to the risk assessment activities described in the previous sections, SPC's initiatives related to social compliance are guided by our commitment to providing a healthy and safe work environment for our people. Our objective is to maintain a culture of zero tolerance for any harm and injury to our employees, contractors, and visitors.

Modern Slavery Statement 2023-2024

REVISED VERSION FOR SUBMISSION

Actions identified in the last reporting period that were undertaken in this Reporting Period included:

- Formal Modern Slavery training materials were developed with the intention to deliver this training across the business in the next reporting period.
- Modern slavery policies, KPIs, risk assessments and supplier questionnaires were developed and will be implemented in the next reporting period into 2025.

The effectiveness of these actions will be regularly assessed once implemented.

SPC Employee Code of Conduct

The [Employee Code of Conduct Policy](#) outlines SPC's commitment to a safe, harmonious, and professional working environment, free of discrimination, bullying, and harassment. The SPC Employee Code of Conduct applies to all employees, agents, contractors, subcontractors, consultants, and temporary staff of SPC.

All new and existing staff and employees at SPC are required to complete training on the SPC Code of Conduct annually.

Supplier Code of Conduct

The Supplier Code of Conduct provides an opportunity for SPC to communicate its position on ethical practices and set clear expectations for suppliers wishing to work with SPC. We include Modern Slavery clauses in our procurement and supply agreements where relevant to help ensure, from a contractual perspective, that our suppliers share our values and are committed to eliminating Modern Slavery from their own supply chains.

Suppliers contracted with SPC are obligated to make their best efforts to comply with the principles outlined in our Supplier Code of Conduct or their own Code of Conduct if it is based on the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the principles outlined in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

SPC has found direct contractual obligations to be a highly effective way of ensuring suppliers are committed to high standards of ethical and legal practices.

Modern Slavery Statement 2023-2024

REVISED VERSION FOR SUBMISSION

Whistleblower Policy

We have a [Whistleblower Policy](#) that establishes a confidential process for our employees and contractors to report concerns, including those related to modern slavery. Protection is provided to individuals making reports to ensure there is an avenue to raise concerns without fear of retribution.

During the Reporting Period, SPC did not receive any complaints concerning the risk of modern slavery in our operations or the supply chain. This is despite the process being regularly utilised by our people to report on other matters, showing it is an effective monitoring program.

At SPC, we are dedicated to providing a healthy and safe work environment that prioritises the wellbeing of our people. Continuous improvement is integral to our safety practices, and we believe that everyone plays a role in making SPC a safe place to work, both physically and psychologically. Safety is our top priority for everyone, and together we can make a significant impact on the health, safety, and wellbeing of our people.

Employee Assistance Program

Telus Health is SPC's Employee Assistance Program (EAP) provider. Telus Health has skilled clinicians available 24x7 to confidentially discuss any concerns that our employees or their immediate family may be facing. The EAP can be contacted 24 hours per day, 7 days per week at no cost to employees. The EAP offers timely, qualified assistance and support to help manage all of life's complexities.

The Road Ahead & Future Commitments

The following actions are planned for the next reporting period:

- Working group meeting regularly throughout the year to review risk assessments, specific cases, reports and actions relating to modern slavery obligations.
- Group wide modern slavery training across all relevant employees and contractors.
- Implementation of the modern slavery policies, KPIs, risk assessments and supplier questionnaires which were developed in this Reporting Period.
- Continue to refine its procedure for responding to modern slavery cases that we may become aware of as part of the continuous due diligence process. It is anticipated that focus on this will be included as part of SPC's review of its responsible sourcing standards in the next reporting period.



Modern Slavery Statement 2023-2024

REVISED VERSION FOR SUBMISSION

Consultation, Approval and Signature

SPC prepared this Modern Slavery Statement with an interdisciplinary approach and sought input from the Sales, Marketing, Procurement, Legal and Compliance, Human Resources and Finance functions which serve both SPC Global Ltd and SPC Operations Pty Ltd.

The Board of Directors and the Executive Team which are the principal governing bodies of both reporting entities covered by this joint statement were provided with drafts of this statement for review and provided commentary during the consultation process. This Modern Slavery Statement was prepared in consultation with the Board of Directors and Executive Team of SPC Global Ltd and SPC Operations Pty Ltd. The governing body of both reporting entities approved the statement prior to finalisation and submission.

The final version of the Modern Slavery Statement was presented to the Board of Directors in December 2024 and approved the statement on the same date. This revised version of the Modern Slavery Statement was approved by Hussein Rifai and Robert Iervasi in May 2025. In accordance with the Act, this Modern Slavery Statement is signed by Hussein Rifai as Chairman and Robert Iervasi as Director of the SPC group of entities, including both of the reporting entities. Hussein and Robert were the responsible members of each of the reporting entities during the Reporting Period and sign this statement in that capacity.

Signed:



Robert Iervasi

Director

SPC Global Ltd & SPC Operations Pty Ltd



Hussein Rifai

Chairman

SPC Global Ltd & SPC Operations Pty Ltd

Modern Slavery Statement 2023-2024

REVISED VERSION FOR SUBMISSION

Disclosure Matrix

	Mandatory Criteria	Disclosure reference (Page number)
1.	Consultation and Approval	6-7
2.	Identify the reporting entity	1-2
3.	Describe the reporting entity's structure, operations, and supply chains	3-4
4.	Describe the risks of modern slavery practices in the operation and supply chains of the reporting entity and any entities it owns or controls	3-6
5.	Describe the actions taken by the reporting entity and any entity it controls to assess and address these risks, including due diligence and remediation processes.	5-6
6.	Describe how the reporting entity assesses the effectiveness of these actions	5-6