

MODERN SLAVERY STATEMENT

2023







Introduction

This Modern Slavery Statement is made on behalf of Tivoli Investments Pty Ltd and all its Group entities, namely:

- Inguz Harvest Pty Ltd
- Harvest FreshCuts Pty Ltd
- Vegco Pty Ltd

Collectively referred to in this Statement as "One Harvest".

This Statement is made for the purposes of the Modern Slavery Act 2018 (Cth) and is the third Statement published by One Harvest.

One Harvest is committed to ensuring sustainable operations and supply chain that respects human rights. One Harvest recognises the importance of building and maintaining strong partnerships with our suppliers. Suppliers are an integral part of our business, helping us ensure that not only through our products but also through our day-to-day operations, we are supporting a better life for all.







Our Structure, Operations and Supply Chain



One Harvest is a family-owned Australian company that grow, process and supply our value-add produce to supermarkets and green grocers nationally. Our operations include four facilities and employ more than 1,000 people. Our product range includes prepacked salads & vegetables and fresh-cooked beetroot & potatoes.

One Harvest has a wide range of suppliers providing a breadth of products & services including but not limited to agricultural raw materials, packaging, ingredients, logistics, machinery, maintenance, training, consulting, legal and financial services. These suppliers range from family-owned, small to medium sized businesses, to international organisations. Most suppliers (and all growers) operate and supply from within Australia.

Our website (<u>www.oneharvest.com.au</u>) provides further insights into our operations, suppliers and our commitment to "help people live better lives."





Assessing and Addressing Modern Slavery Risks

Modern slavery refers to a range of serious forms of exploitation including forced labour, debt bondage, human trafficking and child labour.

One Harvest is collaborating with its suppliers, customers and other relevant stakeholders to promote ethical practices and assist in minimising the risks of modern slavery within its operations and supply chain.

One Harvest has a risk assessment framework which evaluates all current and new suppliers against the following four key modern slavery risk factors to determine their overall risk rating:



In terms of risk assessments performed on One Harvest's supply chain, most suppliers continue to exhibit low overall modern slavery risk factors. We have a particular focus on the controls and mechanisms that we have in place with our growers that are part of the agricultural industry, considered to have a higher inherent risk of modern slavery.

One Harvest has an ongoing reliance on labour hire providers, but to a lesser degree than has been required in recent years. One Harvest has developed policies and maintained mechanisms to regularly ensure that all labour hire providers remain compliant with all relevant standards and protocols. Appropriate modern slavery clauses have been included in all labour hire agreements. All of One Harvest's current labour hire providers hold current Sedex membership.





In terms of mitigating, any modern slavery risks in relation to One Harvest's operations, in particular for our workforce, appropriate labour practices are enforced through the following policies:

- One Harvest Code of Conduct;
- Equal Employment Opportunity Policy;
- Discrimination, Workplace Harassment and Sexual Harassment Policy;
- One Harvest Reimbursement Policy;
- One Harvest Annual Leave and LSL Policy; and
- One Harvest Whistle-blower Policy.

Further to these, our internal People & Capability Team facilitates recruitment either directly or with the use of reputable recruitment agencies. All employees go through a structured on-boarding process.

Our Approach

Accountability for Modern Slavery Risks & Issues

One Harvest has an Ethical Committee which is chaired by the Head of Procurement. This Committee ensures compliance with the Act and address identified modern slavery risks and issues. The committee is responsible for the continuous improvement and review of the supply chain risk assessment framework, review of modern slavery questionnaires completed by suppliers and providing quarterly updates to the One Harvest Board's Audit & Finance Risk Committee.

Supplier Engagement & Management

A structured supplier onboarding process ensures that the appropriate due diligence reviews and risk assessments are performed prior to engaging a new supplier. Staff who initiate and review relationships with third parties are provided with training to apply the supply chain risk assessment process.

All existing and new suppliers are to comply with contractual obligations relating to modern slavery, as well as the obligations set out in our Supplier Code of Conduct.

Suppliers must take all reasonable steps to ensure that there is no modern slavery in their supply chains and operations. If a supplier identifies any occurrence of, or material risk of modern slavery in their supply chains or operations, they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify One Harvest as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.





Incorporating Modern Slavery into Policies

One Harvest have a Modern Slavery Policy which has been communicated to all staff and a Supplier Code of Conduct which has been distributed to the Groups' supplier base. When existing policies undergo review or new polices are under development, policy owners are required to identify modern slavery commitments and protections to be incorporated.

Communications, Engagement and Training

All relevant staff, including the Board, Executive Team and those responsible with engaging suppliers are provided adequate training to enhance their understanding of the causes and impact of modern slavery, the Modern Slavery Policy and our approach to limiting the risk of modern slavery within our supply chains and operations.

Reporting Unethical or Unlawful Conduct

Anyone with concerns about non-compliance, illegal or unethical activities relating to modern slavery are encouraged to report these concerns by making use of the One Harvest Whistle-blower Hotline, with modern slavery compliance built into the Whistle-blower Policy.

Progress Made During 2023

Sedex & Fair Farms Transition

We continue to engage with our supplier base as we work to ensure that our suppliers subscribe to the Sedex platform and/or Fair Farms for our growers. The main attention during the year was focused on the higher risk supplier categories, including labour hire, growers, and logistics.

Summary of status as at the writing of this statement was as follows:

Supply Chain Category	% Active Sedex / Fair Farms Membership
Labour Hire	100%
Logistics	60%
Packaging and Ingredients	60%
Growers	45%





Modern Slavery Awareness Training

All employees (including labour hire team members) are required to undertake modern slavery awareness training via our online HRIS platform at least once per year. One Harvest remains committed to ensure all our team members are aware of modern slavery and what they can do to identify, report and prevent such risks or noncompliance within our operations and those of our suppliers.

Approved Supplier Program

One Harvest maintains an active register of approved produce suppliers determined by the supplier's ongoing compliance to meet standards across a range of areas including as relates to farming practices and holding appropriate certifications relating food safety, people safety, and ethical standards. One Harvest has bolstered resourcing in this area during 2023 to ensure we proactively review and address changes to the various controls that the growers have in place across the network.

Assessing the Effectiveness of One Harvest's Actions

As part of our Risk and Compliance processes, the Ethical Committee continues to review and update, where necessary, any controls, processes and policies that will assist in mitigating modern slavery related risks.

The often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report, however One Harvest is committed to working with suppliers to remediate any breaches of our Modern Slavery Policy or Supplier Code of Conduct.

We have engaged with multiple suppliers to work together to remove modern slavery risks from both party's supply chains and commenced further transparency in governance and controls through the creation of a trading relationship in the Sedex platform.

Improvements in the supplier onboarding process have been implemented to review potential risks up front and to engage in discussions and consultation around ethical sourcing processes and policies.





Instances of Non-Compliance

Two instances of non-compliance were managed through 2023. The issues both related to anomalies with how a labour hire firm was paying workers relative to the appropriate industrial instrument. The anomalies that had arisen were due to the supplier's genuine misinterpretation of the appropriate conditions and there was no evidence of any deliberate activities to exploit workers.

The matters were discussed with the relevant provider and all anomalies were corrected. The supplier responded professionally throughout the process and addressed the issues and resolved the issues that were identified. They further showed suitable evidence that they had tightened controls within their relevant systems. One Harvest is confident that there is no ongoing risk or compliance issues for both parties in relation to this matter.

As a result of these non-compliance findings, One Harvest has further strengthened its Labour Hire Management policies and practices and provided education to personnel across the business who have regular and or ongoing engagements with labour hire providers.

Our Focus for 2024

One Harvest remains committed to the continuous improvement in our approach and maturity around addressing modern slavery risks within our operations and supply chains. Our focus in the coming year will be on the following:

Ethical Trade Membership/Certification

Continue to support our suppliers in transitioning over to an ethical trade membership/certification being Sedex or Fair Farms. Further to this, we will be engaging with our suppliers to ensure value is added in their operations through the benefits of these memberships, rather than a pure "tick box" compliance mentality.

Supplier Ethical Trade Audit Framework

Continue to develop our supplier audit framework policy and processes, leveraging on the third-party frameworks, Sedex and Fair Farms.

Education & Training

Continue to train and develop our people to have a better understanding of modern slavery risks, to help identify potential risks within our operations and when





interacting with our supply chain. Leveraging on our partnerships with Sedex and Fair Farms to train appliable staff on using these frameworks to perform more detailed due diligence and risk assessments and to also help support our supply chain elevate their maturity in relation to the management of modern slavery risks.

Process of Consultation

All entities within the One Harvest Group operate under the direction and governance of the One Harvest Board and share the same executive management team.

The Board's Audit & Finance Risk Committee retain oversight of the Group's management of its modern slavery risks through the Committee's oversight.

This Statement was approved by the Board of Directors of One Harvest.

Mr Luke Mountford **Chairman**

Date: 22 December 2023