

Modern Slavery Statement

Reporting Period:

1 July 2022 – 30 June 2023

Report Date:

14 December 2023

Royal Foods Aust Pty Ltd ABN: 19 130 110 048



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Modern Slavery Statement 2022-2023

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Modern Slavery Statement 2022-2023

About Royal Foods

Royal Foods Aust Pty Ltd is an Australian-owned and operated food storage and distribution company. We employ approximately 285 staff across six sites nationally. Our warehouse sites are based in Hemmant (Head office - QLD), Condell Park (NSW), Brunswick (VIC), Hallam (VIC), Malaga (WA), and Bassendean (WA). Royal Foods receives, stores, and distributes food to both food service and retail market consumers. The majority of suppliers to Royal Foods are located throughout Australia, with a small number internationally. International suppliers are based in Asia, Europe, and New Zealand. A detailed breakdown of suppliers by region can be found in the appendix at the end of this document.

Further to our distribution operations, Royal Foods also supports a charity – the New Life Trust (Registered Charity No: CH1979). In March 2006, the Managing Directors of Royal Foods established the New Life Trust with the goal to rescue orphaned, abandoned, and vulnerable children in Myanmar. The primary goal of the New Life Trust charity is to provide a safe environment for children at risk. The charity aims to improve the health of children and reduce preventable deaths from disease, provide a rich and quality education, develop and foster employment skills and knowledge, as well as support the children and local community through sustainable farming practices.

Further information about the New Life Trust and their ongoing activities can be found here: https://newlifetrust.org.au/

What is Modern Slavery?

The Commonwealth Modern Slavery Act (Cth) 2018 defines *Modern Slavery* as 'situations where coercion, threats, or deception are used to exploit victims and undermine their freedom'. There are eight primary types of Modern Slavery:



- Slavery
- Trafficking in persons
- Servitude
- Forced labour

- Forced marriage
- Debt bondage
- The worst forms of child labour
- Deceptive recruiting for labour or services

Royal Foods understands the necessity in aiding to abolish these forms of slavery. Royal Foods aims to find and eliminate any identifiable instances of Modern Slavery practices within our business and supply chains.

Where are the risks of Modern Slavery within our operations and supply chains?

Royal Foods operates business proceedings in line with government regulations, including fair and timely wages, suitable working hours, honest recruiting, actively fostering the safety and wellbeing of staff, and ensuring that staff are part of a safe working culture. For these reasons, the risks of Modern Slavery within our operations lay predominately within the suppliers of products to Royal Foods. The risk to Royal Foods is that manufacturers, transportation providers, and external service providers could be fostering Modern Slavery practices within their organisation by means of intentional or negligent conduct.

What is Royal Foods doing to identify and prevent Modern Slavery?

To ensure that Royal Foods is actively identifying and preventing instances of Modern Slavery with our supply chain, we have selected three key quantifiable objectives.

The three key objectives of the current Royal Foods' Modern Slavery identification and prevention methodology are:

- Gaining supplier statements from our suppliers in the form of either a survey or supplier audit.
- 2) Training our staff to understand the scope and importance of action against Modern Slavery.



3) Ensure a platform is available for whistle-blowers to raise concerns about Modern Slavery.

Below summarises the progress towards the stated objectives and what our plans are to further our Modern Slavery awareness and prevention measures.

How are we progressing towards our set objectives?

The below table summarises our current objectives and progress for this reporting period.

Objective	Progress Update	Status
Supplier Questionnaires – Top 10 Suppliers	Prepared and distributed to 'Top 10' suppliers.	Completed
Modern Slavery Training – Key Staff	Prepared and distributed amongst relevant staff. Relevant staff have completed this training.	Completed
Implement a Whistle-Blower Platform	Further work is required on this objective. Royal Foods is actively looking to implement a suitable technological aid in this space, talks are underway with multiple providers that can offer this service. Further work is still needed on this by the management team.	In Progress
Supplier Questionnaires – Top 50 Suppliers	Royal Foods has expanded the Modern Slavery Questionnaire scope, and is actively collecting questionnaire responses from our Top 50 suppliers. Continued work is required in this space and is projected to be completed by Dec 2024.	In Progress
Modern Slavery Training – 50% of Staff	Royal Foods has made this training available for all staff (nationally) to complete. Royal Foods will issue a reminder early in 2024 to complete this training. The current goal is to train at least 50% of staff in Modern Slavery Awareness and Prevention – available to staff through our online training system.	In Progress

Supplier Questionnaires

A supplier questionnaire has been prepared and distributed to our top 10 suppliers. Over the coming months Royal Foods will continue to distribute this questionnaire among our top 50 of



suppliers (based on revenue). The responses to these questionnaires will be collected, examined, and will assist further development of our Modern Slavery identification and prevention plan. No amendments to the supplier questionnaire have been required in the past 12 months.

Staff training on Modern Slavery

Royal Foods believes that training is a fundamental element in helping to identify and prevent Modern Slavery in our supply chains. A Modern Slavery awareness and prevention training course has been developed and distributed among our staff via our online learning management system. All key procurement staff have completed this training. As our Modern Slavery awareness and prevention strategy matures, Royal Foods aims to train at least 50% our staff nationally. Further work in this space is required to meet this target and will be a key focus area for 2024. This training piece was last reviewed in September 2023, no amendments were necessary.

Implementing a Whistle-blower Platform

A whistle-blower platform is to be established that allows our staff and allied suppliers to report suspected issues of Modern Slavery. Royal Foods aimed to have a secure whistle-blowing platform available before the end of 2022, but challenges arose in the development of a safe and suitable platform for this system to operate within. The development and implementation of a whistle-blower platform has been an ongoing challenge. Alternative technological solutions to this problem are being investigated at present, and further progress updates will be documented at the next review of this Modern Slavery Statement.

Summary of Current Actions

Royal Foods aims to ensure that all instances of Modern Slavery in our supply chains are identified and eradicated. Royal Foods will accomplish this through the steps set out above, as well as reviewing the program during the next Modern Slavery statement preparation period. Measurable progress has been made towards this goal, but additional work is still required.



Royal Foods aims to model our approach to Modern Slavery policy on the principals of continual improvement. We believe that the steps listed above are a natural progression of our mitigation strategy and will help bolster the framework of identifying and eradicating Modern Slavery from within our supply chains.

Next Modern Slavery Statement due: **December 31st 2024**

Modern Slavery Statement Approval

This Modern Slavery Statement has been approved by the Royal Foods Aust Pty Ltd Board of Directors. Consultation for this statement includes Royal Foods Aust Pty Ltd, and a non-trading entity, Devings Fine Foods Pty Ltd, which is controlled by Royal Foods Aust Pty Ltd.

This Modern Slavery Statement for 2022-2023 was approved by the Royal Foods Aust Pty Ltd Board of Directors on 02 January 2024.

Evert Bos

ABN 19 130 110 048

Eddie Bos - Managing Director, Royal Foods Aust Pty Ltd

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Appendix

Breakdown of Supplier Location

Royal Foods Aust Pty Ltd has at present 154 suppliers of products. Suppliers are located primarily in Australia (87%) and a small number are located internationally (13%), as can be seen in *figure* 1. For Australian suppliers, approximately half of the total suppliers are located primarily within Victoria, a quarter within New South Wales, and slightly less than one-fifth in Queensland, as can be seen in *figure* 2. Finally, for international suppliers, there is an approximate one-third even split between New Zealand, Southeast Asia, and Europe, as seen in *figure* 3.



Figure 1



Figure 2



Figure 3



Collection of Supplier Questionnaires

Below is a table displaying the collection of suppliers and questionnaires collected. Royal Foods will look at expanding this table next year to break these supplier questions down for Australian vs international suppliers.

Questionnaire Goal	Progress
Top 10 Suppliers	Completed – 10 of 10
Top 50 Suppliers	In Progress

Training of Staff in Modern Slavery Awareness and Prevention

Below is a graph displaying the proportion of staff trained in Modern Slavery Awareness and Prevention. Although the total staff will change year-on-year, we expect to increase the annual total proportion of trained staff.



End of appendix