MODERN SLAVERY STATEMENT - 2021

FRESH PRODUCE GROUP



Introduction

Fresh Produce Group is one of Australia's largest and most innovative produce suppliers. From wholly owned farms to joint ventures a continued vertical integration strategy underpins our approach. Our farms and growers across Australia and the world provide our domestic and international customers with quality produce. The business comprises growing, importing, exporting, wholesale, pre-packing, ripening, logistics and marketing of produce in Australia and around the world.

Fresh Produce Group is classified as a reporting entity under the Modern Slavery Act 2018 and as such is required to release a Modern Slavery Statement each year. This statement covers our 2020 to 2021 financial year reporting period. It aims to summarise our assessment of the risks in our operations and supply chains and outline the actions we will take to address those risks.

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage forced marriage, and the worst forms of child labour.

Fresh Produce Group is committed to prevent, mitigate and remedy modern slavery in our operations and supply chains.

Our Entities

Produce Group Western Australia (ABN 81 152 973 932), Treviso Farm Management (ABN 31 144 899 276), Tumut Grove Farm Management Pty Ltd (ABN 46 619 756 115), Smart Berries Pty Ltd (ABN 39 164 122 945), Smart Berries Mundubbera (ABN 30 164 124 903), SB Tasmania Pty Ltd (ABN 25 605 860 017), Fruitico Pty Ltd (ABN 49 608 313 604), Fruitico Farms Pty Ltd (ABN 51 608 318 921), Kimberley Table Grapes Pty Ltd (ABN 17 635 953 187) and Kimberley Asparagus Pty Ltd (ABN 69 609 891 287), collectively referred to in this statement as 'Fresh Produce Group', 'FPG' or 'The Company'.

The above entities are managed collectively under the same policies procedures and guidelines and as such we have decided to provide a joint statement. This statement is submitted on behalf of and prepared in consultation with all of the related entities named above.

Our Location & Operations

Fresh Produce Group is located in Australia and operates in New South Wales, Victoria, Tasmania, Queensland, and Western Australia. We work across the produce supply chain, growing, sourcing, exporting, importing, packing, ripening, logistics, marketing and distributing quality produce. Fresh Produce Group employs approximately 600 full time, part time and casual employees as our core labour force in Australia. In addition to this our workforce increases with the seasonal demands of our business and can include up to 1200 employees per year.



We supply a range of produce to major supermarket chains and leading independent retailers throughout Australia and internationally. Fresh Produce Group is comprised of 11 farms across Australia which are wholly owned or joint ventures which grow and supply table grapes, berries, citrus and asparagus. Our produce is distributed across Australia as well as exported through our cool chain distribution network to international customers.

We use our purpose-built distribution centres in Sydney and Brisbane and packing sheds across our farms to receive, store, handle, and dispatch our produce. In addition to our own produce we are a provider of supply chain management and logistics for many other fresh produce companies. We utilise our facilities in Australia to maximise the efficiency of our supply chains and provide a range of tailored and specialised services to meet the needs of various companies.

Additionally, Fresh Produce Group operates a wholesale stand at the Sydney Markets. Our wholesale stand maintains close contact with independent retailers, which provides us with market insights and the changing taste and demands of consumers. These insights provide us with vital information to better service our customers, both locally and internationally.

Supply Chain

Fresh Produce Group prides itself in our strong relationship with long term suppliers both domestically and internationally. We partner with approximately 1000 trade and non-trade suppliers and in FY2021 our largest traded commodity was fresh table grapes.

Our produce is sourced through direct and indirect relationships with domestic and international growers. Outsourced services used across our supply chain include logistics, transport, distribution, labour, and information technology.

Maintaining close relationships with our suppliers is critical to the longevity of partner relationship and ensures our suppliers understand and meet all legal and customer requirements in Australia and overseas.

Risks of Modern Slavery

FPG strives to mitigate and prevent Modern Slavery within our operation, however we recognise that there are potential risks in our complex supply chain. Upon completion of a risk assessment we have identified the following areas where there is greater risk in contributing to modern slavery practices, including:

- Third Party Service Suppliers
- Third Party Labour Hire
- Domestic & International Produce Suppliers



Addressing Risks

In response to the outlined risks of modern slavery in FPG's supply chain and operations, Fresh Produce Group is committed to the implementation of the following actions.

Sedex Memebership

FPG is a member of Sedex, a supplier data exchange online platform focused on the sharing of company information including work health and safety, business ethics and environmental management. As such we utilise Sedex tools and services to manage our operations and supply chain risks. FPG is committed to utilising Sedex tools and services for all existing suppliers and the onboarding of all new suppliers to major domestic retailers, to provide assurance of supplier actions towards mitigating and preventing modern slavery.

FPG will continue to undertake an annual SMETA (Sedex Member Ethical Audit) at our main warehouse and farm locations.

Direct Employment

FPG directly employs workers in all of our locations where possible. Due to seasonal demands across our business we partner with labour providers. To ensure good labour practices and working conditions, we have internal management systems which include reviewing documentation including licences and regular internal auditing to ensure maximum visibility and compliance.

Policies & Procedures

FPG has various company policies that outlines our commitment to business conduct and ethics. These include our: Human Rights and Ethical Trading Policy, Whistle blower Policy and Reporting Procedure, Young Worker and Child Labour Policy, and Verification of Entitlement to Work Policy. These policies are reviewed annually.

We aim to ensure all staff are aware of the company's commitment to responsible sourcing. This will involve:

- including modern slavery awareness training in all new-employee inductions,
- specialised training for our technical compliance and produce trading departments focusing on how to identify modern slavery for when they perform on-site visits to suppliers.
- inclusion of business ethics as a board topic in executive and stakeholder board meetings.

FPG is committed to review these actions and their effectiveness in mitigating and preventing modern slavery annual reviews and in future risk assessment.

Assessing Outcomes

Fresh Produce Group is committed to implementing the actions outlined over the next financial year. These actions will be reviewed and reported on in our next Modern Slavery Statement. Each year we will review our actions taken to mitigate modern slavery through our annual reporting mechanism. This will include annual review and risk assessment of modern slavery practices at an executive and board level, annual audits, annual policy review, third party audits, annual labour hire provider audits, consultation with employees for regular engagement and feedback, and working with our suppliers.

Conclusion

Fresh Produce Group is committed to continuous investigation into modern slavery practices across our supply chain and improvement of our policies and processes to combat those risks. We will continue to work in partnership with our suppliers and consult across our business to further our awareness of risks and continue to develop actions with a goal of eliminating modern slavery.

This statement has been approved by The Board of Directors of Fresh Produce Group.

Robert Nugan

Executive Chairman

