

Introduction:

This Modern Slavery Act Statement (**Statement**) for Alimfresh Pty Ltd ACN 002 831 843 (**Alimfresh**) has been prepared in accordance with the *Commonwealth Modern Slavery Act 2018* (the **Act**) for the period of 1 July 2022 to 30 June 2023.

The Statement outlines the procedures and processes we have in place to identify, manage and address potential modern slavery risks within our operations and supply chain, as well as detailing our intentions to continuously improve our performance in the coming reporting period.

Modern Slavery, as defined in the *Modern Slavery Act 2018*, describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery include but are not limited to; human trafficking, slavery, servitude, forced labour, debt bondage, child labour or any other form of slavery which involves deprivation of a person's liberties by another person to exploit them for commercial or personal gain.

This statement outlines how Alimfresh satisfies each of the seven mandatory criteria to be reported on under the *Modern Slavery Act 2018*.

Criteria 1- Identify the reporting entity

This statement has been completed for Alimfresh Pty Ltd (ACN 002 831 843).

Alimfresh is a privately owned Australian company. Alimfresh are subject to reporting on the mandatory criteria outlined under the *Modern Slavery Act 2018*

Criteria 2- Describe the reporting entity's structure, operations and supply chain

Alimfresh is one of the largest farming operations of egg and egg products within Australia, consisting of a network of owned and contractor farms within NSW and the ACT, as well as several grading and processing sites. Eggs are produced through numerous production systems including cage, cage-free and free-range farms. Eggs are then transported to centralised grading facilities where they are packaged into sales units for retail and food service across Australia or exported into international markets.

Alimfresh's processing site allows eggs unsuitable for retail and shell markets to be turned into other processed egg products and used at large manufacturing sites.

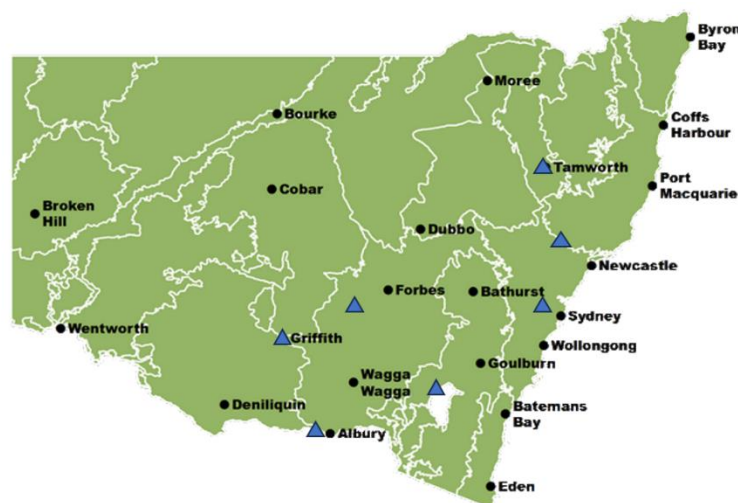


Image 1: Map of Alimfresh locations

	<p>Modern Slavery Statement 2023</p>	<p>Document No: HR0209 Issue No: 001 Issue Date: 20/12/2023</p>
--	--------------------------------------	--

Our Team

Alimfresh employs approximately 277 permanent employees and is supported by 128 part time and casual staff. Alimfresh also employs workers on temporary contracts to meet seasonal and regional demands.

In June 2023, Alimfresh engaged workers through the PALM (Pacific Australia Labour Mobility) Scheme for its remote West Wyalong site. Alimfresh currently employees 7 staff under this scheme, who are supported by an approved third-party employment agency specialising in recruitment within the agriculture industry.

All employees work in Australia and are covered by various awards under the *Fair Work Act 2009*. Alimfresh is currently in the process of transitioning from an enterprise bargaining agreement to various awards.

Supply Chain

In the reporting period, Alimfresh had approximately 185 tier one suppliers. Suppliers range in size from small family-owned businesses to large multinational corporations.

The majority of Alimfresh suppliers are based in Australia and have been part of the supply chain for more than 5 years, with many supplier relationships extending to over a decade of partnership.

Alimfresh's supply chain is diverse and includes suppliers of material products to technical service providers. A summary of key supply chain categories is outlined below:

- Day-old chicks
- Eggs
- Feed ingredients
- Added ingredients
- Chemicals
- Packaging
- Maintenance contractors
- Laboratory services
- Calibration services
- Logistics operators

All suppliers must comply with Alimfresh's approved supplier program and complete an annual approved supplier questionnaire.

Criteria 3- Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls

The *Walk Free Global Modern Slavery Index* report (2023) identifies Australia as having a low prevalence of modern slavery and is recognised for being a global leader for government responses to modern slavery. However, we recognise Alimfresh operates in the agriculture industry which is identified as having an elevated risk of modern slavery within Australia.

Alimfresh has adopted a risk-based approach to identifying and addressing modern slavery risk across the business operations and supply chain, including prioritising actions where Alimfresh can exercise influence to meaningfully address risk to people.

Using this approach, the principal risks identified for Alimfresh in the reporting period arise from:

- Employment practices
- Procurement practices

Employment Practices

We recognise the risk that Alimfresh could cause modern slavery through its employment practices. We have assessed the risks associated with employment practices as low for the following reasons:

- Alimfresh's own workforce is controlled by recruitment and ongoing management procedures including hiring process. This process includes identifying position requirements, management approval, recruitment, and onboarding.
- In addition, Alimfresh's employment practices ensure all Alimfresh staff are provided appropriate working conditions. These practices are outlined within a number Alimfresh's human resources policies including Employee Code of Conduct, Grievance Policy (which includes an anonymous channel for reporting grievances), and Equal Employment Opportunity, Discrimination, Harassment and Bullying policy, which are reviewed periodically to ensure compliance with employment regulation and appropriate management of risk. All Human Resources and Safety policies are available to all staff via the Alimfresh Intranet.

- The above processes also apply to workers employed through the PALM scheme and labour hire agencies. In addition, Alimfresh only engages with reputable labour providers, who have long term relationships with Alimfresh.

Procurement Practices

We recognise the risk that Alimfresh could contribute to, or be directly linked to, modern slavery through its procurement practices for its operations and supply chains. Alimfresh is undertaking a process of reviewing and assessing this risk more comprehensively in the next reporting period, however currently undertakes the following:

- When procuring new suppliers, due diligence is completed through a screening process including the completion of an Approved Supplier Questionnaire and supporting documentation including but not limited to (safety certifications, insurance licences etc.)
- Consideration of whether suppliers produce their own Modern Slavery Statements and are members of SEDEX undertaking their own social accountability audits.

Criteria 4- Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes;

Employment Practices

Sedex and SMETA Audits

Alimfresh have proudly been a member of SEDEX *Supplier Ethical Data Exchange* for over 10 years. SEDEX is a global online platform which maintains data on businesses ethical and responsible practices. As part of the SEDEX membership, Alimfresh also take part in regular third party *SMETA 4 Pillar audits* covering labour, health & safety standards, environmental and business ethics. Compliance with the SEDEX program and audits performance is a requirement of many of Alimfresh's contracts with customers.

SEDEX audits also extend to labour hire companies to ensure compliance with award rates, labour laws and code of conduct. Alimfresh is currently undertaking a process to increase transparency and communication with labour hire providers to ensure employee information, working rights and employment conditions are appropriately managed by the agencies.

Alimfresh's participation with the PALM Scheme is monitored and reviewed through our SEDEX to ensure compliance with the scheme. Beyond minimum compliance, Alimfresh is focused on engagement and creating a sense of belonging for PALM workers during their time in Australia and have assisted in involving the staff in local sporting teams and other community engagement activities.

Social Accountability Audits

Alimfresh also participates in internal and third party unannounced social accountability audits as a requirement for specific customer contracts. The ad-hoc nature of these audits require Alimfresh to be prepared for an audit at any time. Findings from these audits are used as a tool to benchmark performance and ensure continuous improvement to strengthen our policies and procedures throughout the businesses.

Alimfresh Employment Practices

In addition to the employment practices outlined within 'Criteria 3' above, all employees are provided with an induction pack at the start of their employment, this pack includes copies of;

- Fair Work Information Statements,
- Fair Work Casual Employment information statement,
- Induction handbook,
- Department of Immigration and Citizenship work right status form
- Company policies including – Grievance, EEO, Harassment, discrimination and bullying

In FY23, Alimfresh sought to increase anonymous reporting for employees through the implementation of employee feedback boxes, however, uptake of employee feedback was limited through this channel of communication. In response, Alimfresh is developing a new digital tool with which employees can provide anonymous feedback through an online survey accessible via QR code.

Procurement Practices

Proposed Supplier Risk Assessment Approach

Consistent with Alimfresh's risk-based approach to identifying and addressing modern slavery risk, we are developing a process to assess current approved suppliers to focus efforts where we can most meaningfully influence and address risk to people. As part of our methodology, we will consider the following factors:

- Any employment or engagement with vulnerable populations
- Operations in high-risk industries or sectors
- Operations in high-risk geographies
- Operations with high-risk business models
- Ability for Alimfresh to engage and influence
- Current processes and/systems to support identification and management of modern slavery risk (including compliance with modern slavery regulation in relevant jurisdictions and internal or third-party audits)

Initial outcomes of this assessment identified high risk suppliers in the following categories – eggs, ingredients and packaging.

Alimfresh will complete a desktop review of each supplier in the next reporting period to assess key risks and identify potential mitigants, including but not limited to:

- Supplier modern slavery statement/policy (or similar)
- Supplier's compliance with SEDEX
- Policies and procedures as they relate to employees, labour and supply chain

Where Alimfresh is satisfied the supplier effectively identifies and manages modern slavery risk within their operations, supplier will be classified as low risk.

Where suppliers are not able to demonstrate effective modern slavery risk management, Alimfresh will engage with suppliers to understand in more detail how modern slavery risk is identified, assessed and mitigated throughout the supply chain.

With consideration of the diversity of Alimfresh's supply chain, from family-owned businesses to multi-national corporations, Alimfresh will take a tailored approach to supplier engagement with consideration of the strength and tenure of the relationship, and ability for Alimfresh to engage and influence supplier performance. We recognise this is an iterative process and will need to be adapted as required on a case-by-case and ongoing basis.

Current Approach to Supplier Risk Management

As part of Alimfresh's broader and ongoing supplier and risk management approach, Alimfresh currently completes the following:

- Review of supplier compliance with SEDEX program and audits (as required).
- Supplier questionnaires including disclosure of key policies and procedures (e.g. code of conduct, work, health & safety, social accountability and labour standards, and emergency preparedness).
- Increased engagement with suppliers by digitalising and updating questions within the supplier questionnaires which has led to an increased response rate over the last 12 months.
- Regular meetings occur between operational teams where issues (including labour and employment practices) can be raised by all members of the team to improve our procedures and processes. All meeting minutes are recorded and reviewed on a regular basis.
- Crisis management planning to ensure continued uninterrupted supply to our customers. This includes an 'Event Risk Management' process to identify potential hazards and assess the likelihood and consequences. Annual testing of the Crisis Management plan is undertaken on various scenarios to ensure all key stakeholders are aware of how to respond in the event of a crisis. Currently, this process does not include Modern Slavery – this is a key action for the next reporting period. However, in the instance a modern slavery allegation or breach was identified, the same principles and procedures outlined within the crisis management plan would be followed.

Criteria 5- Describe how the reporting entity assesses the effectiveness of these actions:

At a minimum, Alimfresh's performance against labour and social accountability standards are continually reviewed through annual social accountability self-assessments, approved supplier reviews, staff satisfaction surveys, and regular reviews of risk registers, policies and procedures.



As part of our commitment to continuous improvement within the business, Alimfresh has identified the following focus areas for the next reporting period;

1. Develop a more comprehensive risk assessment procedure to identify and mitigate risks within procurement practices. Proposed supplier risk assessment approach is outlined above within 'Criteria 4'.
2. Continue the process of transitioning from an enterprise bargaining agreement to various awards.
3. Strengthen the current Crisis Management procedure to include review of modern slavery risks within our supply chain.
4. Continue to engage with suppliers and share expectations of suppliers regarding social compliance and modern slavery, through creation of a supplier code of conduct policy.
5. Request suppliers complete a modern slavery declaration on an annual basis as part of their approved supplier status.
6. Continue to audit our labour hire providers ensuring employee conditions meet Alimfresh's social compliance requirements. Improve reporting and transparency between Alimfresh and labour hire providers on continued compliance to regulatory requirements.
7. Continue reviewing our internal policies and procedures to ensure compliance with all applicable laws and regulations.
8. Provide training to key internal stakeholders on modern slavery risk management.
9. Continue to assess and manage modern slavery risks through third party audits (SEDEX) to demonstrate compliance and accountability with customer expectations. Where possible, improve our performance and reporting of this process.
10. Develop and operationalise a formalised whistleblower policy.
11. Continue to provide and improve opportunities for employees to provide anonymous feedback and reporting to the business, including the development of a new digital tool to provide feedback via an online survey accessible via QR code.

Criteria 6- Describe the process of consultation with any entities the reporting entity owns or controls

This Modern Slavery statement was completed in consultation with the relevant operational teams, executives and directors of Alimfresh. Alimfresh also engaged with relevant external stakeholders, to provide advice and expert insight to inform the development of this statement. Ongoing review and improvements are conducted through a consultative process with all functions of the business to ensure all risks and issues are identified. All Alimfresh executives and directors were provided with an opportunity to review the statement prior to its approval.

Criteria 7- Provide any other relevant information

All relevant information has been provided under each of the above criteria.

Approval

This Modern Slavery statement has been reviewed and approved by the Board of Directors of Alimfresh Pty Ltd on 19th December 2023 and has been signed by Philip Wiese as Chief Executive Officer.

Philip Wiese
Chief Executive Officer