

Pablo & Rusty's Modern Slavery Statement

Pablo & Rusty's Coffee Roasters(P&R) [Pablo and Rusty's Pty Ltd ABN: 20 137 878 589] oppose slavery in all its forms. This statement is intended to meet the requirements of s54 of the United Kingdom's Modern Slavery Act 2015, s12 of the Australian Modern Slavery Bill and s24 of the Modern Slavery Act 2018 (NSW). This statement outlines the steps taken by Pablo & Rusty's Coffee Roasters and all its wholly owned subsidiary businesses and divisions during the financial year ending 30 June 2021 to seek to minimise the risk of modern slavery occurring in our business and in our supply chain.

At P&R we accept our role and responsibility in trying to safeguard human rights through ethical, sustainable and suitable business practices. We also recognise that human rights is a key area of interest for our internal and external stakeholders. Therefore this is a key focus for us both from a moral standpoint and from a commercial benefit. We are trying our best to ensure that human rights are respected within our business and throughout our supply chains.

We acknowledge that this is a journey that we have started to improve our modern slavery risk identification and to mitigate it. We recognise this as a process of continuous improvement and are fully committed to it.

We support and rely on the following globally recognised declarations, principles and goals:

- Universal Declaration on Human Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact

- International Labour Organisation Declaration of Fundamental Principles and Rights at Work
- United Nations Women's Empowerment Principles
- United Nations Sustainable Development Goals

P&R has adopted a risk-based approach to modern slavery act implementation and due diligence. We have primarily focused on the human rights of direct employees and the human rights of those in the final stage of our supply chains. We have always had ethical practices as a cornerstone of suppliers we deal with. We have recognised that our employees and the final stages of our supply chains are areas where we could make the most significant contribution. Goods not for resale and services supply chains have been identified as potentially carrying modern slavery risks and although we are already working on human rights in our goods not for resale and services supply chains, this is harder and there is further work to be undertaken. Unless otherwise specified, this statement refers primarily to our direct employees and the final stages of the supply chain.

Our structure, operations and supply chain

From its origins in 2005, P&R has grown into a key player in the specialty coffee roaster segment in Australia. We are primarily based in NSW with an outpost in Brisbane and clients all over Australia, New Zealand as well as some global clients. We employ close to 100 people mostly in Australia; however, we also have some overseas team members who are a key part of our team.

We source both directly and through brokers, raw and finished products from all over the world. Our primary input is raw (green) coffee beans which we manufacture and sell to our clients. Our coffee beans come from all over the world including Brazil, Colombia, Yunnan (China), Ethiopia, Indonesia and many others. Most of these countries are high or extreme risk for human rights issues.

While our operations and supply chains are complex, our aim is to ensure that human rights are understood, respected and upheld. We expect our partners and stakeholders to adhere to ethical business conduct consistent with our own. We have already made a lot of positive relationships through our insistence on more transparency of working conditions at coffee farms that we buy from and refusing to buy from those that don't treat this as a priority.

P&R is committed to making positive economic, social and environmental contributions to society, consistent with the principles of honesty, integrity, fairness and respect. We prohibit discrimination and forced, trafficked and child labour and are committed to safe and healthy working conditions.

Our governance of modern slavery risks is set out below

Potential modern slavery risks

We recognise that we must take steps to identify and address any actual or potential adverse impacts with which we may be involved whether directly or indirectly through our own activities or our business relationships. This table outlines the potential modern slavery risks for our business.

Table 1: Potential modern slavery risks for our business

Potential Modern Slavery Risk	Identification Process
Non-compliance with our labour standards in the supply chain including health and safety, working hours, wages, forced labour and child labour, and freedom of association.	Our business have different modern slavery risks depending on various factors, including the level of human rights protection and enforcement in the countries where they we source from. With a high number of farmers our products come from in countries where the level of protection of human rights in regard to labour conditions is low, there is risk of harm to people. We also

recognise that this risk also exists for suppliers based in Australia and have not ignored Australian suppliers in this exercise.

Non-compliance with broader human rights which can be connected to or indicative of modern slavery risk, including employee rights to equality, fair pay, safety and privacy.

We have identified that some level of discrimination based on gender, age, race, disability, sexual orientation, cultural background, religion, family responsibilities or other areas of potential difference is a potential risk in any business. Employee safety is our highest priority and while we are seeing the benefits of a relentless focus on making our workplaces safer, we acknowledge that if team members are injured at work, our safety performance still requires improvement. Privacy is also a material issue. We have systems and procedures in place to protect privacy but acknowledge that privacy protection requires ongoing significant resources.

Actions taken to address modern slavery risks

We regularly undertake the following actions to mitigate the potential modern slavery risks in Table 1.

Table 2: Actions to mitigate potential modern slavery risks

Potential Modern Slavery Risk	Actions to mitigate
Non-compliance with our labour standards in the supply chain including health and safety, working hours, wages, forced labour and child labour, and freedom of association.	Before we contract with a new supplier we assess its risk against our criteria. We regularly communicate our purchasing policy and our minimum requirements under our Ethical purchasing standards and elimination of modern slavery. We aim to build long-term direct relationships with suppliers to work with them to safeguard human rights. This may have a number of additional benefits. For example, a long-term relationship may provide increased certainty for their businesses, may lead to increased efficiencies and productivity, and may result in the delivery of enhanced services and products. We keep our buying and sourcing teams up-to-date on our ethical sourcing and human rights commitments and how their actions may impact workers' rights. We train relevant employees on how to incorporate respect for human rights into all business decisions, making employees aware of the impact their actions can have on human rights.

Non-compliance with broader human rights which can be connected to or indicative of modern slavery risk, including employee rights to equality, fair pay, safety and privacy.

We have policies which incorporate the importance of “respect for the rights of all”, including our employees. P&R strives to create a work environment which is inclusive of all people regardless of gender, age, race, disability, sexual orientation, cultural background, religion, family responsibilities or other areas of potential difference. We also carry out regular EEO training for all staff (Equal Employment Opportunity) with extended training focused on those in positions of leadership and management.

Assessing the effectiveness of actions

P&R measure our performance in respect of ethical and sustainable practices through a number of mechanisms including:

Table 3: Evaluating our performance

Effectiveness Measure	Details
Training and capacity building	Everyone in the business is regularly trained to understand and comply with the minimum standard we expect. Those in leadership positions and within sourcing teams get further training to equip them to make the right decisions.
Complaint and grievance mechanics	We have feedback systems built in for stakeholders to raise concerns about unethical behavior including modern slavery risks within the business or its supply chains. This includes the ability to anonymously lodge the complaint.

Supplier engagement

We regularly engage our suppliers to ensure that they understand and undertake the required risk identification and mitigation activities within their businesses and supply chains to ensure human rights are protected.

We are committed to continuous improvement and recognise we are on a journey to improve our modern slavery risk identification and mitigation. We are also a certified B Corporation, Carbon Neutral organisation and part of the % for the planet movement and also ensure we meet criteria under this standard and are audited accordingly.

Conclusion and approvals

Our modern slavery statement was prepared by an assembled team of Pablo & Rusty's representatives from various teams.

This modern slavery statement for Pablo & Rusty's was approved by the sole director, Mr. Saxon Wright, for Pablo & Rusty's Pty Ltd ABN 20 137 878 589 on 18th July 2022.

Signed by:



Saxon Wright

Sole Director and Founder of Pablo & Rusty's Pty Ltd

18th July 2022