



**ANNUAL MODERN SLAVERY STATEMENT 2022-2023**

[MITOLOFAMILYFARMS.COM.AU](https://mitolofamilyfarms.com.au)



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## INTRODUCTION

Mitolo Family Farms is a second-generation family owned fully integrated farming business with over forty years' experience specialising in potatoes and onions.

Our product brands include:

- Carisma Potatoes;
- Mitolo Family Farms Low Carb Potatoes;
- Gourmandine Potatoes;
- Little Tractor Potatoes;
- Comit Farm;
- Scorpion; and
- Blackjack.

Mitolo Family Farms acknowledge that modern slavery can occur in different forms such as human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services. This annual modern slavery statement sets out our comprehensive but evolving approach to combatting modern slavery risks in our business operations and supply chains.

*"Mitolo Family Farms recognises the impact that Modern Slavery has on many lives and families and prides itself on its commitment to make a difference in the Horticulture industry to drive change and ensure all human lives are respected and treated fairly"*

*"Mitolo Family Farms has prepared this Modern Slavery Statement to address the key risks of Modern Slavery within our business to ensure greater awareness and responsibility within our supply chain and our operations to create a better life for all including our customers, team members, supply chain and the community we live and work in."*

*Frank Mitlo*



**CARISMA™  
POTATOES**

**LOW  
CARB  
POTATOES**

**GOURMANDINE**



**COMIT FARM**



**Blackjack**





## **MANDATORY CRITERIA ONE AND TWO:**

### **IDENTIFY THE REPORTING ENTITY AND DESCRIBE ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS**

This modern slavery statement is prepared and provided for the Mitolo Group Pty Ltd (ACN. 076 809 982) as a single reporting entity. We are referred to in this statement as the Mitolo Group and operate with other commonly controlled entities as Mitolo Family Farms.

The Mitolo Group is the corporate trustee for our main trading entity Comit Trading Trust. The trading trust transports, washes, grades and packs potatoes and onions and then dispatches and sells to retail and wholesale customers throughout Australia and exports to various countries overseas.

Mitolo Family Farms is concerned with the growing and harvesting of potatoes and onions; the growing, harvesting and selling grapes to wineries; farming and production services; the commercialisation and research and development of potato seed varieties, and the employment of head office business operations.

The Mitolo Group is headquartered at *1304 Angle Vale Road, Virginia, 5120, South Australia* and we have sites in the following states and regions:

**Riverland, South Australia**  
**Mallee Region, South Australia and Victoria**  
**Virginia Region, South Australia**  
**Riverina Region, New South Wales**



The Mitolo Group and other entities of Mitolo Family Farms directly employ approximately 800 employees, spread across our farming services, vineyard operations, washing and packing facilities, and management and administration functions. In addition, we engage third parties for the supply of labour hire employees to meet the seasonal demands of harvesting and packing fresh produce.

In support of our business functions as an integrated farming business, we engage a range of suppliers in the general activities of temporary labour services, chemicals and fertilisers, machinery manufacturing and associated repair and maintenance, protective personal equipment and uniforms, telecommunications, office services and business technologies and professional services. Most of our suppliers are based locally in Australia, with a few suppliers associated with our seed tissues and machinery based in New Zealand and Europe.



# OUR SUPPLY CHAIN

## SEED OPERATIONS

Industry Sector	Product Type/Service	Geographies (External Suppliers)
Horticulture	Labour	Australia
	Seed-tissue cultures	Europe
	Chemicals/Fertiliser	Australia
	Machinery	Europe & NZ
	PPE	Australia
	Uniforms	Australia

## GROWING OPERATIONS

Industry Sector	Product Type/Service	Geographies (External Suppliers)
Horticulture	Labour	Australia
	Chemicals/Fertiliser	Australia
	Machinery	Europe & NZ
	PPE	Australia
	Uniforms	Australia
	External Consultants	Australia
	Service Providers	Australia

## TRANSPORT OPERATIONS

Industry Sector	Product Type/Service	Geographies (External Suppliers)
Transport	Labour	Australia
	Fuel	Australia
	Vehicles	Australia
	PPE	Australia
	Uniforms	Australia
	Service Providers	Australia

## WASHING FACILITY

Industry Sector	Product Type/Service	Geographies (External Suppliers)
Manufacturing	Labour	Australia
	Chemicals	Australia
	Machinery	Europe & NZ
	Packaging	NZ
	PPE	Australia
	Uniforms	Australia
	Telecommunications/IT	Australia
	Office Equipment	Australia
	Service Providers	Australia

### **MANDATORY CRITERION THREE:**

#### **DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY AND ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS**

The Mitolo Group understands the horticulture industry, in which it operates, has been identified with higher risks of labour exploitation, increasing the risk of modern slavery. For example, the Federal Government's Migrant Worker Taskforce Inquiry in 2018 identified the horticulture industry as an industry where cases of migrant worker exploitation had occurred.

Some State Governments have introduced labour hire licensing legislation specifically targeting contract hire arrangements in the horticulture sector, such as the Labour Hire Licensing Act 2018 (SA).

We have developed a modern slavery risk matrix that we are applying across our business operations and supply chain. The risk matrix enables us to identify specific features of our operations and environment that present higher risks of slavery.





The risk matrix includes risk categories of:

<b>RISK CATEGORY</b>	<b>INDICATORS MAY INCLUDE</b>
<b>INDUSTRY SECTOR</b>	<p>Certain sectors and industries, such as the horticulture industry in which we operate, may have higher modern slavery risks because of the nature of the horticulture industry characteristics, products and processes. The horticulture industry has been recognised as a higher risk industry for labour exploitation by various Government Inquiries (eg the Migrant Workers Taskforce Inquiry) and NGOs.</p>
<b>PRODUCT AND SERVICES RISKS</b>	<p>Certain products and services may have higher modern slavery risks because of the way they are grown, produced, provided or used. In horticulture and farming services, this includes various labour-intensive processes involved with harvesting such as grading, packing and storing and the seasonal nature from which these services emerge. Other indicators may include the product made from materials or using services reported to involve a high risk of labour exploitation by international organisations or NGOs.</p>
<b>GEOGRAPHIC RISKS</b>	<p>While our operations are predominantly in Australia, we recognise that various farming activities are carried out in geographic regions with a more limited supply of services, support and amenities than major metropolitan cities. We also acknowledge that in remote locations the industry is more reliant on seasonal workers. In respect of supply chain functions overseas, we recognise that some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty. Indicators may include where the country is reported to have weak rule of law by international organisations or NGOs, including due to corruption, conflict and/or political instability</p>
<b>ENTITY RISKS</b>	<p>We are aware that some entities in our industry may not have formalised or systematic approaches to addressing labour management practices or modern slavery risks. This may be attributed to the prevalence of smaller businesses we work with who do not have extensive human resources or procurement teams, as well as the seasonal nature of our engagements. Despite this, we strive to build long-standing relationships with our suppliers, including smaller entities.</p>
<b>SEASONAL LABOUR MODELS</b>	<p>Some entities may adopt a labour model involving the actual or likely use of labour hire, foreign workers, 'seasonal workers and working holiday makers', temporary workers and contractors who carry out functions that are not immediately visible (eg remote locations, or ad hoc engagements). Such labour models may increase the risk of slavery in the horticulture industry where the nature of the work performed is largely low-skilled or unskilled. Other indicators of risk may also be the absence of a labour hire licence required under relevant state labour hire licensing laws.</p>



In addition to applying our risk matrix, we have implemented a range of due diligence measures to reduce risks of modern slavery. These are mentioned below under mandatory criterion four.

#### **MANDATORY CRITERION FOUR:**

#### **DESCRIBE THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITIES THAT THE REPORTING ENTITY OWNS OR CONTROLS TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES**

The Mitolo Group has, and will continue to, work in collaboration with key internal and external stakeholders to prevent and address modern slavery risks occurring both locally and around the globe.

We will achieve this by increasing awareness amongst our employees and suppliers of the different forms of modern slavery risks. We will continue to evolve our due diligence processes to ensure the identification of risks, growing the scope of our supply chain risk assessment, reviewing existing policies and processes and developing ways to improve identification and actions on risks within our supply chain. Some of our key due diligence measures we have implemented are described below.

#### **DEVELOPING APPROPRIATE POLICIES**

The Mitolo Group has implemented a range of policies and processes to identify and reduce modern slavery risks. More recently, we have prepared and implemented an Anti-Slavery Policy that sets out our unequivocal prohibition on slavery supported by clear expectations that suspected cases of modern slavery must be reported to designated Mitolo representatives for appropriate action. The Anti-Slavery Policy operates in conjunction with our Ethical Sourcing Policy, Whistleblower Protection Policy, Recruitment Policy, Grievance Policy and Code of Conduct. Our Anti-Slavery Policy and Ethical Sourcing Policy also extend to our suppliers, including contract labour suppliers.

#### **TRAINING OF STAFF**

The Mitolo Group has commenced a program of modern slavery awareness training for our staff so that we are able to understand modern slavery and identify relevant risk factors in our business and industry environment. We continue to review our current staff and ensure any new staff members in relevant roles are trained in Modern Slavery by completing online training and internal training.

Specifically, we have trained and instructed our staff to identify specific risk factors concerning our association with contract labour used by suppliers. These include being alert to the following:

- Groups of workers or individuals that are driven to work by an individual who appears to have control over the worker/s, such as by:
  - Talking on their behalf;
  - Requiring workers to work shifts against their will.
- Multiple workers staying at the same location, where there may be warning signs such as:
  - Workers living in substandard conditions;
  - Workers paying excessive accommodation costs.
- Hearing that workers' passports are withheld by employers or hostels against their will:
  - This type of behaviour may elude to servitude in extreme cases, such as preventing a person from having the freedom to leave work or a place of residence).



## **APPOINTMENT OF MODERN SLAVERY CONTACT OFFICERS**

In recognition that our industry relies on seasonal workers who may be working away from metropolitan areas, we have appointed on-site modern slavery contact officers who may be approached by persons with suspected concerns or reports of modern slavery. Once a report is made, it will generally be escalated to relevant persons in the Mitolo Group's management for further action aimed at preventing further harm to the victim.

## **APPLICATION OF OUR RISK MATRIX TO SUPPLIERS**

We have developed a comprehensive risk matrix of our modern slavery risks that will form the basis for further auditing and monitoring of our suppliers. The key risk categories are identified earlier in this statement.

## **IDENTIFYING OUR SUPPLY CHAIN**

We have commenced 'mapping' our supply chain for the purpose of the application of our due diligence efforts, such as the risk matrix referred above. Given we have identified approximately 1,100 suppliers we are planning for this process to be continuous and conducted in stages based on ratings under our risk matrix.

## **CREATION OF A MODERN SLAVERY TASK GROUP**

The Mitolo Group has created a Modern Slavery Task Group within its business operations to effectively and systematically manage our internal processes and reporting procedures relating to modern slavery risks in our business and supply chain.

## **CREATION OF MODERN SLAVERY FOCUS GROUP**

We have also established a Modern Slavery Focus Group of employees in positions where they may be more exposed to modern slavery risks in our operations and supply chains, such as our production workers and farming administration.

The purpose of this Focus Group is to develop skills and share knowledge of modern slavery risk factors relevant to our business operations and supply chains.

## **MITOLO'S LABOUR HIRE AUDITING PROGRAM**

As referred above, the Mitolo Group recognises that the horticulture industry has been previously recognised as an industry exposed to higher risks of labour exploitation that may indicate modern slavery. With this in mind and in addition to our existing policies, we have for a number of years developed and applied a labour hire worker audit program to ensure standards of good practice and compliance with workplace laws are met by our labour hire providers.

This program consists of a random selection of labour hire employees from a particular labour hire entity who are asked to voluntarily share with us their pay slips and employment records for the purpose complying with relevant workplace laws, including minimum rates of pay, training requirements and VEVO checks.

While this initiative is directed at eliminating labour exploitation, in doing so the program identifies possible risks of more serious crimes associated with modern slavery.

The program highlights to our labour hire employees that Mitolo have a process to discuss if they have any concerns or to raise any modern slavery breaches, they may have with the labour hire company. Labour hire employees are comfortable with the process and voluntarily provide information to ensure employees are paid correctly and are treated fairly.

Mitolo Family Farms is a member of SEDEX – the Supplier Ethical Data Exchange, a not-for-profit organisation. SEDEX is a global membership organisation that prides itself on making it simpler to do business that's good for everyone. Tens of thousands of companies use SEDEX to manage their performance with labour rights, health & safety, the environment and business ethics.



Mitolo Family Farms hosts SEDEX Audits annually on all three of our Production facilities, including Angle Vale Road (SA), Taylors Road (SA) and Hillston (NSW).

The business is also a member of GRASP – The GLOBAL G.A.P. Risk Assessment on Social Practice and is a voluntary, farm-level social/labour management tool for global supply chains.

GRASP covers the main topics of the UN Guiding Principles on Business and Human Rights and the International Labour Organization (ILO)'s core labour conventions.

This is an addendum to the GLOBAL G.A.P. certification, which covers good agricultural practices. The audit for GRASP is conducted annually in conjunction with GLOBAL G.A.P. audit to ensure we comply with our social/ethical responsibilities at farm-level.

## **REMEDATION**

If modern slavery is found to have occurred in our operations and/or supply chains, we will, where appropriate, adopt a remedial approach to prevent further incidents and to ensure safety of the victim. We may also exercise remediation in suspected cases of modern slavery including in the absence of a criminal conviction, or formal court finding.

Where possible, we will work with suppliers to identify how modern slavery has occurred and to implement measures to prevent future incidents.

We may also elect to end engagements with suppliers who refuse to co-operate or comply with our Anti-Slavery Policy or Ethical Sourcing Policy.

This continues to be our approach if breaches of our policies and processes are identified through the risk assessment process.



**MANDATORY CRITERION FIVE:  
DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF  
ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

The Mitolo Group has developed a range of key performance indicators (**KPIs**) that will assist us measure the effectiveness of our due diligence efforts to identify and reduce modern slavery risks. The KPIs include:

- Measuring the frequency of our internal and external training processes, particularly for our staff with allocated responsibilities relating to modern slavery risk identification and assessment;
- Assessing the number and nature of complaints or reports received under our Anti-Slavery policy or under other relevant policies, eg Whistleblower Protection Policy.
- Conducting internal audits and monitoring of specific steps we have taken to assess and address modern slavery risks. eg Audit prequalification checks on our suppliers;
- Measuring the number of supplier contracts we have updated to reflect awareness and assessment of modern slavery risks;
- Monitoring and tracking responses from higher risk suppliers to check how they are progressing and any actions they have put in place;
- Annual checks of our risk assessment process to ensure they remain up to date;
- Where appropriate, partnering with an industry group, external auditor, or trusted NGO (non government organization) to undertake an independent review of our actions;
- Engaging with any regulatory developments aimed at protecting migrant workers or reducing labour exploitation in our industry.

These measures are in addition to creating processes to provide regular engagement and feedback between key areas of the business such as (Quality, HR, Procurement and Legal) and to implement senior management reviews.



**MANDATORY CRITERION SIX:  
DESCRIBE THE PROCESS OF CONSULTATION WITH ANY  
ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS**

The Mitolo Group has a range of measures in place to support consultation about modern slavery risks across our entities.

We have appointed a Responsible Officer to report to the Board on modern slavery issues and concerns both in respect of Mitolo Group's obligations under the Modern Slavery Act 2018 (Cth) and Mitolo Group's practices in its operations and supply chains.

In doing so, the Responsible Officer will consult and seek information from the Mitolo Group and other relevant entities to ensure that relevant operations of Mitolo Family Farms are captured and considered.

Our Modern Slavery Task Group comprising of management representatives will assist in providing oversight on our internal processes for modern risk assessment across our entities, while our Modern Slavery Focus Group comprising of worker representatives will share knowledge of modern slavery risk factors relevant to our business operations and supply chains.

Mitolo Group's policies mentioned above, also apply to relevant operations of Mitolo Family Farms to ensure uniform processes are in place to identify and reduce risks of modern slavery across broader business operations.

We continue to monitor and communicate across the Modern Slavery task group. Mitolo Group has also joined a Modern Slavery industry group to keep up to date with any changes in legislation and keep informed for any developments in modern slavery risks and adopt best practices in our business operations.



**MANDATORY CRITERION SEVEN:  
ANY OTHER RELEVANT INFORMATION**

Like many businesses the Mitolo Group experienced unique challenges to its business operations as a result of the COVID-19 pandemic. Our efforts were largely directed at ensuring our workplaces and work sites were appropriately managed to reduce work, health and safety risks associated with COVID-19 transmission.

In respect of our suppliers, our Ethical Sourcing Policy (that pre-dated the outbreak of COVID-19) applying to our procurement processes and suppliers remained in operation and shall continue to apply in conjunction with our Anti-Slavery Policy.

As the COVID-19 pandemic continued to evolve in 2021 and 2022, Mitolo Family Farms has complied with all Australian Government regulations and health advice to ensure the health and safety of our employees is prioritised.

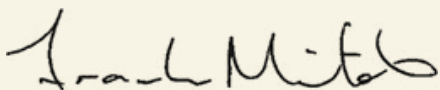
Our supply chain during the COVID-19 pandemic was impacted by shipping and manufacturing issues which limited our accessibility to suppliers. COVID 19 has had an impact on increasing energy costs and export restrictions which resulted in additional supply chain demands. We understand this can result in the increased vulnerability of workers in our global supply chain to modern slavery. Mitolo have continued to prioritise our supplier engagement to ensure we are identifying, assessing and mitigating any modern slavery risk due to COVID-19.

**FURTHER ACTION**

The Mitolo Group is committed to continuously improving our Modern Slavery risk in our business operations and supply chain and to further develop our understanding of Modern Slavery and mitigate risk.

**APPROVAL OF THIS STATEMENT**

This annual modern slavery statement for the reporting period 2021-2022 was approved by the principle governing body of Mitolo Group Pty Ltd, being a group of members with primary responsibility for the governance of Mitolo Group Pty Ltd.



**22 December 2023**

Signed by the Managing Director  
Responsible member of the principal governing body  
Frank Mitolo  
Mitolo Group Pty Ltd  
22 December 2023

Date of approval





MITOLO  
FAMILY FARMS

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