



Modern Slavery Statement 2023-2024





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INTRODUCTION

On 14 June 2024, Pomona Valley and Montague merged to form one business, Montague Farms, led by Scott Montague as CEO.

Montague Farms stretches from Legana in Tasmania to Batlow in New South Wales, stopping on the way at Narre Warren North, Harcourt, Ardmona, Dilpurra and Mildura in Victoria. The business consists of 1,000 hectares of productive orchards and significant packing operations. Montague Farms produces apples, pears, cherries, plums, peaches, nectarines, apricots, grapes and citrus.

At Montague Farms we acknowledge the significant impact of modern slavery on many lives and families. We are committed to making a positive difference within the horticulture industry. We take pride in our dedication in driving change, ensuring all human lives are treated fairly and with respect.

This Modern Slavery Statement has been prepared for the reporting entities outlined in Appendix A and sets out the key risks of modern slavery within our business, aims to raise awareness of modern slavery within the horticulture industry and foster responsibility throughout our supply chain and operations.

At Montague Farms, our goal is to improve the lives of everyone involved, including our customers, team members, suppliers, and the communities where we live and work.

MANDATORY CRITERION ONE: Identify The Reporting Entity

This Modern Slavery Statement ('Statement') is provided as a joint statement under the *Modern Slavery Act 2018* (Cth) ('Modern Slavery Act') for:

- Montague Bros (Holdings) Pty Ltd (ACN 006 001 332) and its subsidiaries for the period from 1 July 2023 to 13 June 2024 ('Montague').
- Pomona Valley Consolidated Pty Ltd (ACN 649 518 169) ('Pomona Valley') and its subsidiaries for the period from 14 June 2024 to 30 June 2024 ('Montague Farms').

Details of the reporting entities covered by this Statement are set out in Appendix A.



MANDATORY CRITERION TWO:

Describe the structure, operations and supply chains of the reporting entity

Our Operations

Montague Farms grows, transports, grades and packs apples, pears, cherries, plums, peaches, nectarines, apricots, grapes and citrus fruit and sells to retail, wholesale and export customers to various countries worldwide. Additionally, we have an Intellectual Property ('IP') management business which commercialises new fruit varieties in partnership with local and Australian growers and fruit breeders around the world. This involves managing associated trademarks.

Our product brands include:

Apples:

- **JAZZ™**
- **envy™**
- **Ambrosia™**
- **eve™**
- **KISSABEL®**
- **yello®**
- **Smitten®**
- **Sweetango™**

Stonefruit:

- **the MONTAGUE tree™**
- **CROC EGGS™**
- **Nectara™**
- **Color-Cot™**
- **Donut™ Peach**

At our Narre Warren North site, we have a small retail division which offers quality food and beverage products, including homegoods to the public.

The Montague Farms head office is based at 10-18 Horswood Road, Narre Warren North in Victoria, 3804 and we also have orchards in the following regions:

- **Legana, Tasmania**
- **Goulburn Valley, Victoria**
- **Mildura, Victoria**
- **Harcourt, Victoria**
- **Swan Hill, Victoria**
- **Riverina, New South Wales**

Montague Farms directly employs approximately 300 employees throughout our farming operations, packing facility, operations and logistics and management and administration functions. Additionally, we engage third parties for the supply of labour hire employees to meet the seasonal demands of harvesting, transporting and packing our fresh produce.

As an integrated farming business, to support our various business functions, we engage a range of suppliers. These range from temporary labour services, machinery maintenance and repair, chemicals and fertilisers, uniforms and personal protective equipment, office services, business technologies, communications and professional services.

Our Supply Chains

Intellectual Property Operations

Industry Sector:
Horticulture

Product Type / Service:

Labour
Novel plant varieties
Chemicals / fertilisers
Machinery
PPE
Uniforms

Geographies:

Australia & Pacific Islands
Worldwide
Australia
Worldwide
Australia
Australia

Growing Operations

Industry Sector:
Horticulture

Product Type / Service:

Labour
Chemicals / Fertilisers
Machinery
PPE
Uniforms
External Consultants
Service Providers

Geographies:

Australia & Pacific Islands
Australia
Worldwide
Australia
Australia
Worldwide
Australia

Transport Operations

Industry Sector:
Transport

Product Type / Service:

Labour
Fuel
Vehicles
PPE
Uniforms
Service Providers

Geographies:

Australia
Australia
Worldwide
Australia
Australia
Australia

Packhouse

Industry Sector:
Horticulture

Product Type / Service:

Labour
Chemicals
Machinery
Packaging
PPE
Uniforms
Telecommunications/IT

Geographies:

Australia & Pacific Islands
Australia
Worldwide
Worldwide
Australia
Australia
Worldwide

Retail

Industry Sector:
Retail

Product Type / Service:

Labour
Products & services
Sourcing of goods

Geographies:

Australia
Worldwide
Worldwide

Office & Management

Industry Sector:
Clerical & Management

Product Type / Service:

Labour
Machinery
PPE
Uniforms
External Consultants
Telecommunications/IT

Geographies:

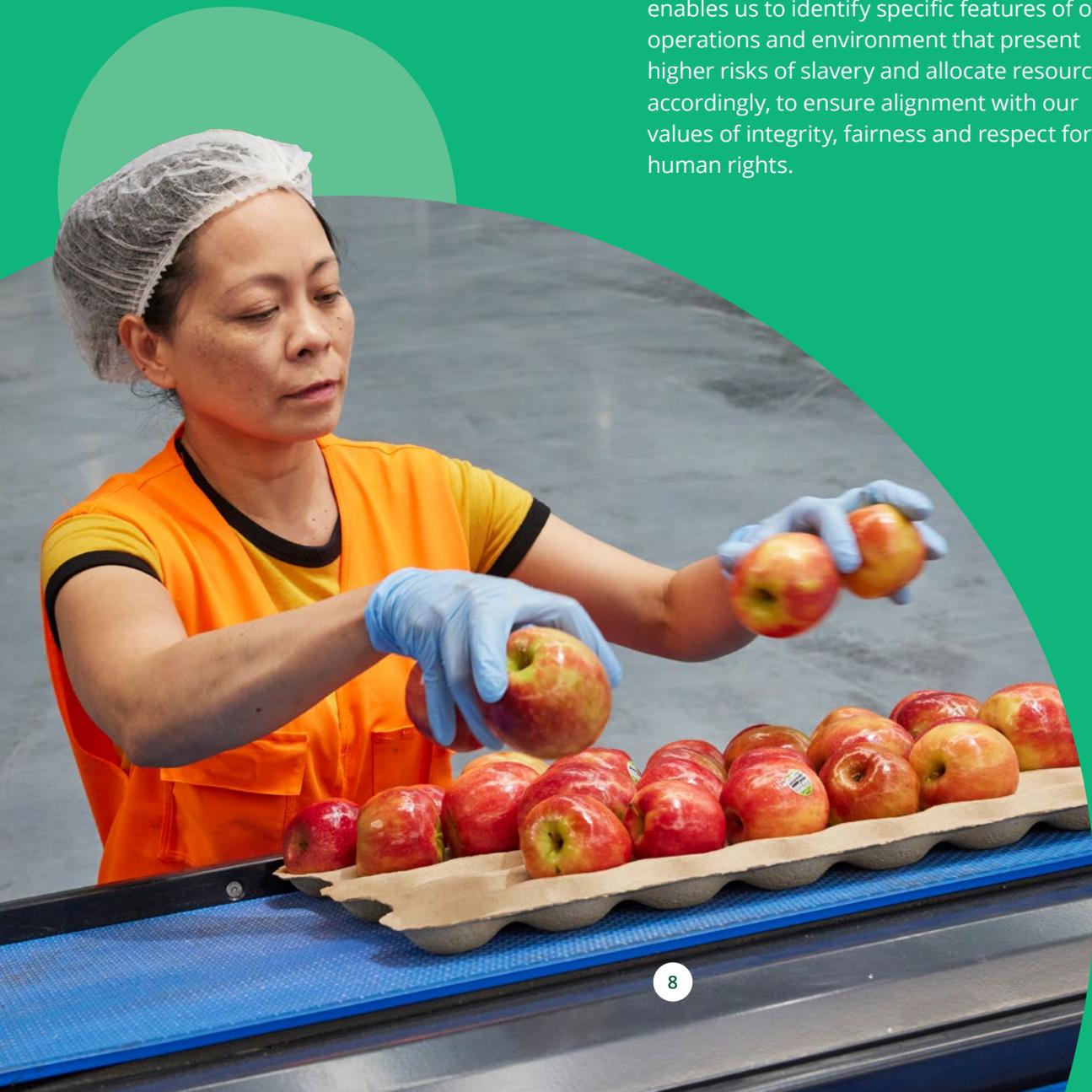
Australia
Worldwide
Australia
Australia
Worldwide
Worldwide

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

Montague Farms acknowledges the horticulture industry, in which it operates, inherently presents modern slavery risks, particularly with labour-intensive activities and in regions with vulnerable workforces.

We are committed to ensuring modern slavery has no place in our business or supply chains. This commitment is reflected in the modern slavery risk matrix that we are developing and applying across our operations and supply chain. This risk matrix enables us to identify specific features of our operations and environment that present higher risks of slavery and allocate resources accordingly, to ensure alignment with our values of integrity, fairness and respect for human rights.





Risk Matrix

INDUSTRY SECTOR	INDICATORS MAY INCLUDE
INDUSTRY SECTOR	<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 (e.g. the Migrant Workers Taskforce Inquiry) and NGOs.</p>
PRODUCT AND SERVICES RISKS	<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>
GEOGRAPHIC RISKS	<p>While the majority of our operations are conducted in Australia, we recognise that various farming activities are carried out in remote geographic regions with supply of services, support and amenities more limited than in major metropolitan cities.</p>
ENTITY RISKS	<p>We are aware that some entities in our industry may not have formalised or systematic approaches to address 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>
LABOUR FORCE RISKS	<p>The horticulture industry relies heavily on labour models involving the 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 (e.g. remote locations, or ad hoc engagements). Such labour models may increase the risk of slavery where there are migrant workers who face language barriers or where the nature of the work performed is largely low-skilled or unskilled. These workers are more likely to be at risk of exploitation due to insecure employment arrangements, lack of awareness of their rights, and dependency on their direct or labour hire employer. Other indicators of risk may also be the absence of a labour hire licence required under relevant state labour hire licensing laws.</p>

MANDATORY CRITERION FOUR:

Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address modern slavery risks, including due diligence and remediation processes

During the reporting period, we have:

1. **Updated our Ethical Sourcing Policy:** to ensure that all employees and suppliers are aware of our expectations to conduct our operations in a socially responsible and ethical manner.
2. **Enhanced our employee training programs:** to ensure that all relevant staff members understand how to identify and report any modern slavery concerns.

Montague Farms works in collaboration with key internal and external stakeholders to prevent and address modern slavery risks.

Policies and Governance

We have developed and implemented a range of policies and processes to identify and reduce modern slavery risks. Most recently, our Board of Directors approved a new Ethical Sourcing Policy that applies to all employees, contractors and suppliers and outlines our standards and expectations regarding upholding labour rights, human rights, health and safety and business integrity in our supply chain.

Other examples of key policies reviewed during the reporting period include our Anti-Bribery & Anti-Corruption policy, Code of Conduct, Workplace Behaviour policy, Corporate Social Responsibility policy and Delegation of Authority policy. Montague Farms also implements an Approved Supplier program and has a Whistleblower Policy that provides confidential mechanisms via our external provider, Stopleveline, and internal Whistleblower Protections Officers for employees and stakeholders to report concerns. We have added translation services to our whistleblower site to support workers with language barriers.



Training and Capacity Building

We aim to increase awareness among our employees and suppliers of the different forms of modern slavery risks. We have partnered with Safetrac to deliver a new and engaging learning and development system to our employees. During 2024, our training programs covered our:

- **Code of Conduct:** to ensure all employees understand and adhere to our ethical standards and expectations, particularly regarding due diligence on third parties and conflicts of interest.
- **Risk Management:** to equip employees and stakeholders with the skills to identify, assess and mitigate modern slavery risks in operations and supply chains.
- **Whistleblowing:** to create a safe environment where employees, suppliers, and other stakeholders feel empowered to report unethical or illegal practices without fear of retaliation.

We are committed to continuously improving our practices by strengthening our supply chain risk assessment, regularly reviewing existing policies and processes and implementing improvements identified in regular audits of our processes and businesses within our supply chain.



MANDATORY CRITERION FIVE:

Describe how the reporting entity assesses the effectiveness of modern slavery risk management

To assess the effectiveness of our actions, Montague Farms:

1. **Monitors compliance:** through regular audits and self-assessments
2. **Reviews its risk management processes:** internal processes are reviewed on an ongoing basis to ensure they remain robust and aligned with legal requirements and best practice.
3. **External support:** to ensure our approach to combat modern slavery is effective and update to date, Montague Farms is in the process of engaging external experts.

SEDEX and SMETA

As part of Montague Farm's commitment to assessing and addressing modern slavery risks, the organisation undertakes an annual SEDEX Members Ethical Trade Audit ('SMETA'). This audit is a procedure created by the Supplier Ethical Data Exchange ('SEDEX') not-for-profit, membership organisation, that leads work with buyers and suppliers to deliver improvements in responsible and ethical business practices in global supply chains. SMETA is based on the conventions of the International Labour Organisation ('ILO') and provides a globally recognised framework for evaluating responsible supply chain activities by employing best ethical audit techniques.

During the reporting period Montague Farms complied with all SMETA standards and continues to invest in educating our workers and suppliers to ensure ethical compliance is maintained.

Montague Farms has identified opportunities to further enhance our auditing and education processes and is actively working to implement this within our business.



MANDATORY CRITERION SIX:

Describe the process of consultation with any entities that the reporting entity owns or controls

The development of this Statement was led by our People and Culture team, which consulted directly with key functions, including sales and operations and strategy and innovation, across Montague Farms to draft the Statement. The final draft of the Statement was reviewed collectively by each reporting entity for accuracy and completeness. Each member of senior management at Montague Farms has signed off on the final statement, acknowledging their role in Montague Farms' commitment to addressing modern slavery in the business.

In accordance with the requirements of section 14(2)(d)(ii) of the *Modern Slavery Act*, this Statement was approved by the Board of Directors of Montague Farms on 20 December 2024 in their capacity as principal governing body of Montague Farms on behalf of all reporting entities covered by this Statement, and is signed by the Chief Executive Officer of Montague Farms.



Tim Lee
Director
Montague Farms



APPENDIX 1

List of Reporting Entities

Montague Farms has prepared this Statement for the Reporting Entities during the Reporting Periods detailed below:

REPORTING ENTITIES	REPORTING PERIODS
Montague Bros. (Holdings) Pty Ltd (ACN 006 001 332) ('Montague')	1 July 2023 to 30 June 2024
Montague Bros. Pty Ltd (ACN 005 611 549)	1 July 2023 to 30 June 2024
Montague Fresh (Aust) Pty Ltd (ACN 075 580 111)	1 July 2023 to 30 June 2024
NWN Development Pty Ltd (ACN 632 222 112)	1 July 2023 to 30 June 2024
Pinelodge Lease Pty Ltd (ACN 633 246 812)	1 July 2023 to 30 June 2024
W.F. Montague Property Pty Ltd (ACN 149 675 481)	1 July 2023 to 30 June 2024
Montague Farms Pty Ltd (ACN 673 574 804) ¹	11 December 2023 to 30 June 2024
Montague Farms JV Pty Ltd (ACN 673 575 061) ¹	11 December 2023 to 30 June 2024
Montague Farms Land Pty Ltd (ACN 673 572 739) ¹	11 December 2023 to 30 June 2024
Montague Farms People Pty Ltd (ACN 673 575 123) ¹	11 December 2023 to 30 June 2024
Pomona Valley Consolidated Pty Ltd (ACN 649 518 169) ('PVC') ²	14 June 2024 to 30 June 2024
Pomona Valley Holdings Pty Ltd (ACN 649 518 954) ³	14 June 2024 to 30 June 2024
Pomona Valley Orchards Pty Ltd (ACN 649 519 620) ³	14 June 2024 to 30 June 2024
Pomona Valley Pty Ltd (ACN 649 520 589) ³	14 June 2024 to 30 June 2024

¹ Entity was incorporated on 11 December 2023.

² PVC acquired 100% of the shares in Montague on 14 June 2024.

³ Entity is a subsidiary of PVC.

