

An aerial, high-contrast black and white photograph of ocean waves crashing over dark, jagged rocks. The water is turbulent, with white foam from the breaking waves contrasting sharply with the dark, shadowed rocks and the deep blue-black water. The perspective is from directly above, looking down at the sea.

**ICONIC**

FOOD DISTRIBUTION PTY LTD

**MODERN SLAVERY  
STATEMENT 2022**

# MODERN SLAVERY ACT 2018: MODERN SLAVERY STATEMENT 2022

At Iconic Food Distribution Pty Ltd (Iconic) we are committed to managing our business ethically and responsibly. We commit to implementing and enforcing effective systems and control modern slavery across our entire supply chain.

We have adopted a set of core Values and Business Principles that govern our activities and interactions with all our stakeholders across the world. We are also committed to promote the application of these Values and Business Principles by our business partners and suppliers.

Our Code of Ethical Sourcing has been designed to promote safe and fair working conditions and it has been guided by the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**), and the responsible management of environmental and social issues across Iconic's supply chain.

The Code has been developed in consultation with employees and suppliers. It sets out the standards we wish to see achieved by Iconic and our suppliers over time.

The principle of continuous improvement applies to all aspects of the Code.

Iconic will work collaboratively with our suppliers on the implementation of the Code, which may include joint audits and site visits to assess performance.

Iconic agrees to report on the implementation of and compliance with Modern Slavery Act annually.

Iconic will expect all suppliers to implement our Code across their whole business and within their own supply chains.



# 01 REPORTING ENTITY

Iconic Food Distribution Pty Ltd  
(ACN 162 600 633) (Iconic) as trustee  
for the Iconic Food Distribution Unit Trust  
(ABN: 14 544 679 738).



# 02 STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## STRUCTURE

The General Manager of Iconic reports to the Directors.

The Modern Slavery Committee reports to the General Manager.

The Directors of Iconic together with Senior Management also attend quarterly Iconic Shareholder meetings

## OPERATIONS

Iconic Food Distribution was established in 2015 to market the Sirena Brand.

Iconic is a major distributor of imported canned tuna and ready to eat meals. We supply our products into the retail and food service sectors in Australia, New Zealand and the Middle East.

Iconic conducts product development, sales and marketing of its products under the Sirena brand.

All Iconic employees are based in Melbourne. Our warehousing is sub-contracted to a 3rd Party Logistics supplier, which operates facilities in Victoria and New South Wales, Australia.

## SUPPLY CHAIN

Iconic supply chain procures finished retail food products and services.

We source our finished products from manufacturers in Thailand and Indonesia. Our fish supply is sourced from across the Western Pacific Ocean and the Indian Ocean. The main areas of fish supply are Indonesia and the Maldives.

### These products include:

- Canned Tuna
- Tuna Meals
- Ready to eat shelf stable Meals

Iconic are a member of the International Pole and Line Foundation. This Foundation promotes and empowers sustainable fisheries while supporting social and economic development for the local communities that depend on them. Our commitment to this foundation is an important pillar in our policy to ensure the sustainable future of these fishing communities.

### Head Office:

Melbourne Australia

### Products manufacturing location:

Indonesia – canned tuna

Thailand – canned tuna and meals

### Warehousing:

Melbourne, Australia

Sydney, Australia



# 03 MODERN SLAVERY RISK:

According to the Modern Slavery Risk Global Index, our Head Office and 3PL warehouses in Australia are considered low risk jurisdictions. By complying to Australia's legislative frameworks, we are placed in a very low risk environment.

We assess that our highest risks are in the sourcing of tuna from Thailand and Indonesia, in that modern slavery and unethical practices are known to be prevalent in the fishing industry in these two countries.

Iconic has identified a higher risk around third-party suppliers that work for our manufacturers overseas.

This risk increases in those jurisdictions and geographical areas where human rights' frameworks might be weak. (Indonesia, Maldives, Thailand)

According to our Code of Ethical Sourcing Policy, in conjunction with Modern Slavery Act, we can only conduct business with manufacturers that practice and follow the SMETA 4 Pillars Principles and the Modern Slavery Act.

We work closely with our suppliers to close this gap and are committed to identifying further ways by which Iconic can improve supply chain performance.



# 04 ACTION TAKEN TO UNDERSTAND AND ADDRESS MODERN SLAVERY RISK

Iconic has appointed a Modern Slavery Committee. This committee reports to the executive team on a quarterly basis.

We only engage in working relationships with tuna suppliers who provide Binding Corporate Rules certification (BCR) and with Sedex member companies who have completed SMETA certification to ensure compliance to the 4 pillars:

- a) Labour standards based on ETI base code
- b) Health and safety for employees
- c) Environmental
- d) Business Ethics

We are committed to better manage the potential risks of modern slavery across all aspects of our supply chain. We have taken the following actions:

- e) Updated our Ethical Code of Sourcing Policy, to ensure we accommodated the Modern Slavery Act 2018.
- f) Code of Ethical Sourcing Policy has been signed by all product suppliers.
- g) Updated our Supplier Approval Process to include all requirements from the Modern Slavery Act 2018.
- h) Rolled out education on Modern Slavery across relevant staff

- i) Conduct annual risk assessments to categorise the level of risk using the Modern Slavery Risk Global Index and record them into our risk register
- j) Checked and confirmed that all product suppliers were audited to SMETA 4 pillars or Similar standard e.g. ISO AS8000 on an annual basis.



# 05 ASSESS EFFECTIVENESS OF ACTIONS:

We will continually assess the effectiveness of our action and the risks by:

- a) Ensuring suppliers acknowledge and agree to abide by our Code of Ethical Sourcing. Signed confirmation will be required on an annual basis and added to our internal register.
- b) Senior Management will bi-annually review compliance.
- c) Annual records of BRC and SMETA audits from suppliers, will be sourced and reviewed by Modern Slavery Committee.
- d) Conducting desktop audits and regular visits to manufacturing sites to ensure compliance.
- e) Working with our suppliers to ensure continuous monitoring and continued progress in improving our response to Modern Slavery risks.



# 06 CONSULTATION PROCESS:

Iconic is managed directly by the Senior Management Team and the Iconic Board of Directors.

Our Ethical Code of Sourcing Policy has been signed off by the General Manager and approved by the Board. The Modern Slavery Statement has been approved by the Board and signed by a Director.

Iconic does not own or control any other entities relevant to its operations.





# 07 STATEMENT OF APPROVAL:

This statement has been approved by the Iconic Board of Directors.

Iconic Food Distribution Pty Ltd (ACN 162 600 633)

Name:

Luisa Valmorbida, Director

Signature:



Iconic Food Distribution Pty Ltd





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Modern Slavery Statement, Iconic Food Distribution Pty Ltd - December 2022