



**MODERN SLAVERY
STATEMENT
2022**

Contents

Introduction.....	2
A message from the Group CEO	3
Reporting entity's identity	4
Modern slavery risks & understanding	6
Due diligence, mitigation & remediation.....	8
Assessing the effectiveness of our actions	12
Process of consultation	12
Additional information.....	13
Looking ahead.....	13
Approval of statement.....	14



Australia

1-11 Bliss Court, Derrimut
VIC 2021 Australia
P: +61 3 8368 2808
E: enquiry@freshmax.global

New Zealand

12 Hugo Johnston Drive, Penrose
Auckland, 1061 New Zealand
P: +64 9 553 6374
E: enquiry@freshmax.global

www.freshmax.group

INTRODUCTION

The Freshmax Group came into existence in 1995 with Freshmax Holdings Ltd being incorporated on June 29, 1994, on the New Zealand Registry of Companies. With all the founders' background, education, and passion in the Fresh Produce industry, it all started with the import of Avocados and the export of Kiwifruit, expanding over time to the harvesting and sale of Strawberries to trading in NZ Apples.

After growing its presence in NZ, Freshmax made a number of business acquisitions in Australia and beyond to become one of the premier fresh produce sales and distribution companies in the Southern Hemisphere. Today, Freshmax has operations within New Zealand, Australia, North America and South America and is focussed on the six main fruit export categories from the Southern Hemisphere.

Freshmax has grown with a vision of diversification in fresh produce sectors with international coverage, direct supermarket business, import and export operations with offices and sites around the world. Throughout this journey, the company has always been progressive in its approach towards people and culture.

The group and its subsidiaries and controlled entities are committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting ethical operations whilst growing the business.

Since our first Modern Slavery Statement in 2020, we have continued to expand on our knowledge and the reach of mitigation steps taken. We are issuing this statement under the Australia Modern Slavery Act 2018 which requires Freshmax Group Pty Ltd and its subsidiaries to disclose efforts to ensure that modern slavery is not taking place in our supply chains and business operations. This is our third statement, covering our 2022 financial year (October 1, 2021 - September 30, 2022).

Throughout this statement, we reference "modern slavery," which includes slavery, servitude, forced or compulsory labour, debt bondage, deceptive recruiting for labour or services, child labour and human trafficking. In addition, we reference "Extended workforce suppliers" and "our extended Workforce," which includes suppliers and supplier employees.



A MESSAGE FROM THE GROUP CEO

Our motto at Freshmax is “People passionate about Produce” and we, as a company, are the same when it comes to caring about our people.

With the diversity in supply chain, we are aware of the complexities and the modern slavery risks within and are continually learning and evolving to understand and mitigate the risks identified through the robust processes we have in place.

We have a zero-tolerance approach to modern slavery and are committed to respecting human rights and acting ethically and with integrity in all our business dealings and relationships. One of our key focus areas include developing and implementing effective systems to address any potential Modern Slavery risks within the business and our supply chain.

Freshmax Group’s Code of Conduct provides an ethical and legal framework for all our employees. Our Modern Slavery Assessment aligns to the principles of the Code of Conduct and applies to all business units within.

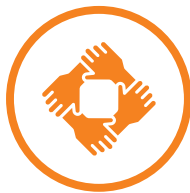
People are at the centre of the business and with this in mind we have refined and re-released Core Values this year:



**We Love
What We Do**



We are One



We Care



**We Create
Value**

And with a vision to promote the culture of corporate compliance and ethical behaviour, the organisation has successfully rolled out our Whistleblower Protection Policy in accordance with our Core Values. This policy ensures the protection of whistle-blowers to foster transparency, promote integrity and deterring and detecting misconduct & wrongdoing.

We have also created a team dedicated to People, Culture, Sustainability, Environment & Quality to provide the right support & guidance throughout the business.

Murray McCallum
Group CEO, Freshmax Pty Ltd

REPORTING ENTITY'S IDENTITY

With the corporate head office based in Victoria, Australia, Freshmax operates out of five countries – Australia, New Zealand, United States of America, Chile and Peru.

Across these regions we focus on multiple core categories via:

- Domestic produce supply
- International produce supply
- Services – treatment, ripening and prepacking

Throughout the supply chain of fresh produce, from field to fork, we see opportunities to drive innovation and efficiency. This philosophy has driven us to the scale we maintain today.

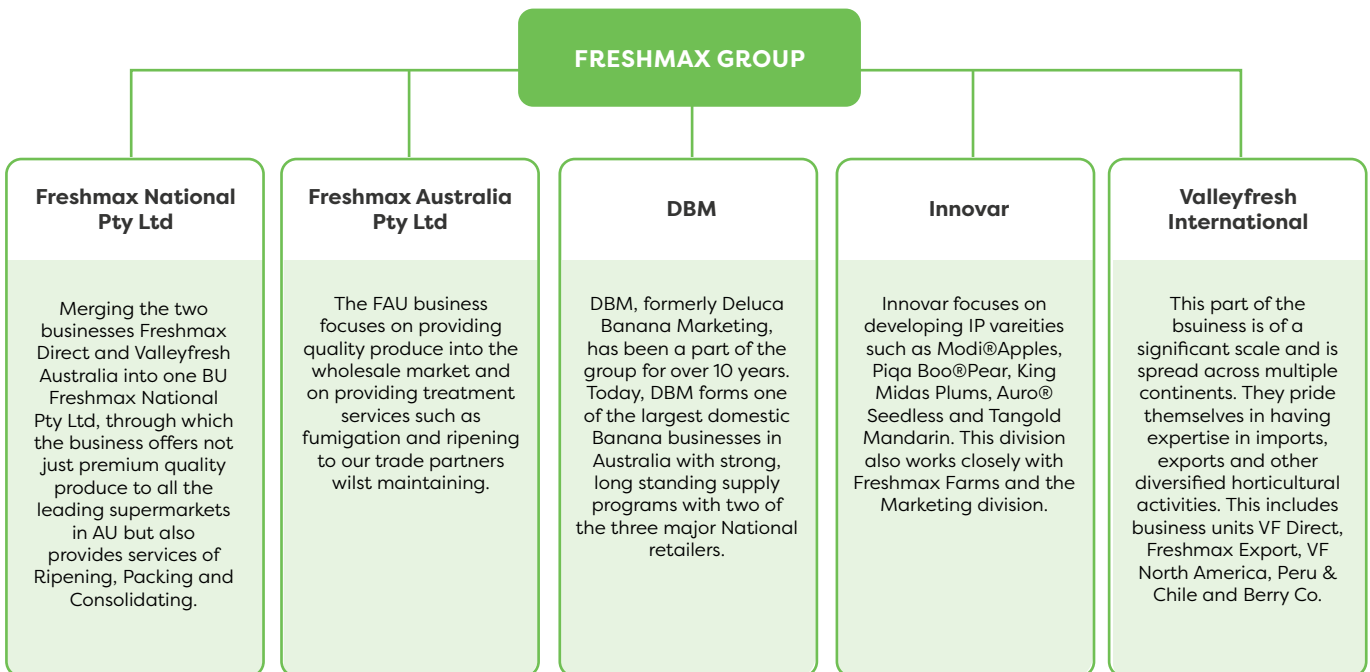
We manage commercial relationships across 87 countries spanning seven continents. Annually, we handle more than 36 million boxes of fresh produce.

Global Reach

Both Australia and New Zealand are world-renowned for producing some of the world's finest fruit and vegetables and Freshmax is proud to offer quality product from some of the countries' best orchards and farms.



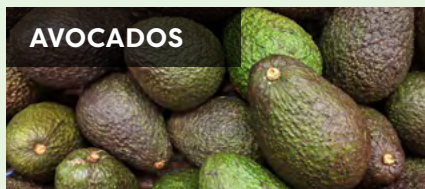
Business Structure



During the reporting period, the group has sold the New Zealand Pipfruit business.

Our Portfolio

Today Freshmax is leading the way in delivering strategic governance across produce categories in the Australasian produce industry whilst also providing quality services to trade partners.



People Passionate about Produce

At Freshmax, we really are like one big, proud family. Our people passionately build our reputation, engage our clients, and continuously look for ways to enhance our excellent customer service standards with a strong focus on the safety and welfare of our people, our supply partners, customers, and the public.

Investing in Young Talent

As strong advocates for the industry-wide drive to bring on young talent, we offer work experience, internships, and graduate opportunities from the field right through to head office.

Best in Class in Agriculture and Operations

Right across the Freshmax Group we run innovative distribution centres, orchards and packing facilities. The workforce we build in each of these facilities is first rate and offers all team members the opportunity to organically augment and develop skills for life.

Challenging Sales and Marketing Role Paradigms

Across our group we offer a myriad of opportunities in corporate and commercial environments from sales & marketing and operations to finance & people & sustainability. We encourage team members in these roles to challenge the status quo and be innovative whilst driving efficiency.

Building leaders

All team members are challenged and supported through our extensive performance framework, ensuring we continuously drive our teams to become the leaders of tomorrow.

Leadership Excellence

Across the Freshmax Group we strive for leadership excellence. This can mean bringing talent into the business externally, but it also means organically growing leadership talent from within.

We are always interested to meet industry leaders who want to explore how they might join the Freshmax Group.



MODERN SLAVERY RISKS & UNDERSTANDING

The disruptions in the global supply chain continued this financial year due to labour shortages, shipping delays and abnormal weather patterns around the globe. In order to maintain consistency in providing services to our customers, the business sourced products and services from approximately 1455 suppliers across the globe with most of the supply partners based in Australia, USA and New Zealand.

With supply partners spread across the world, the business recognises that Modern Slavery risks can arise both within business owned operations and throughout our supply chain where our suppliers can potentially have risks within their own supply chain.

Based on internal review, the business has classified the supply chain into five main categories:

1. Produce,
2. Packaging,
3. Consumables,
4. Services and
5. Transport.

From our supply partners, 60.12% expenditure was accounted by suppliers based in Australia and 71.9% of total sum of spend was for Produce.

Whilst conducting risk assessment within our supply chain to understand if there is any potential for occurrence of Modern slavery or any human rights violation, all factors are taken into consideration including but not limited to inherent risk of the industry, geographical location of the supply partner and the product or service provided. The main risks associated with Modern Slavery within the horticulture industry and taking into account the geographical spread of our suppliers are:

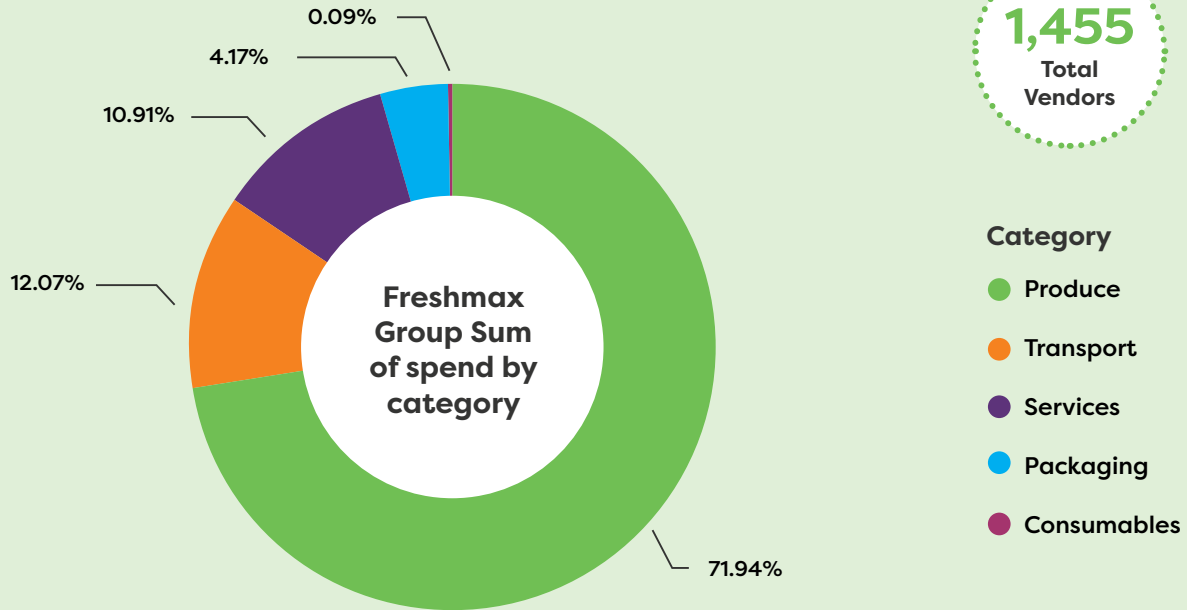
- Forced labour
- Debt Bondage
- Deceptive recruiting for labour or services

This year Freshmax has taken a risk assessment-based approach to understand, develop and implement mitigation plans using the independent third-party management tools such as SEDEX, FairFarms and CENTRL. These tools help the business assess the inherent risks along with risks associated with Forced Labour, Debt Bondage, and Deceptive recruiting for labour or services.

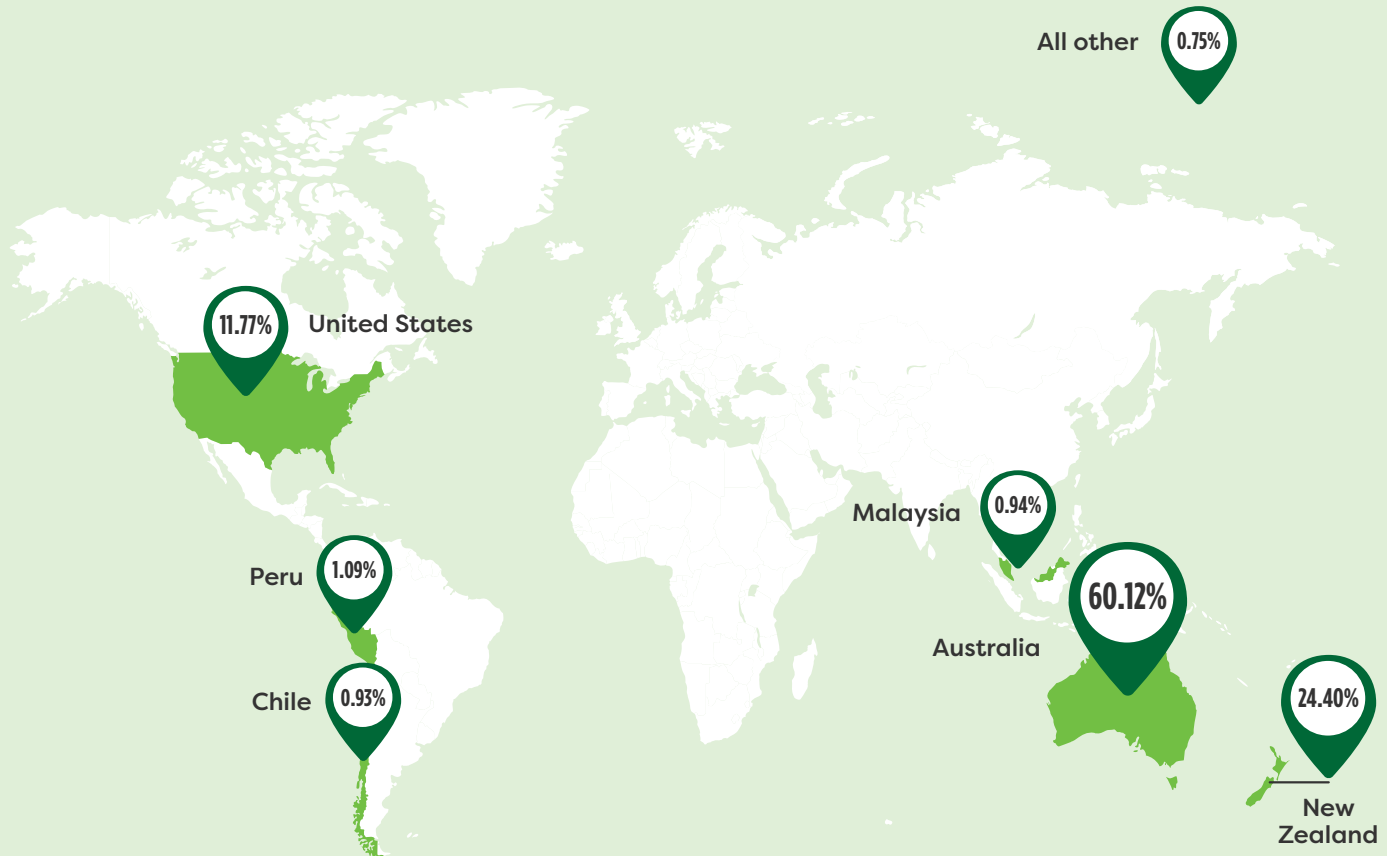
The process is initiated immediately upon engaging with a supplier and is monitored continuously for due diligence. The risk assessment is initially based on the answers submitted through the Self Assessment Questionnaires completed by the suppliers and are classified into three different categories – High, Medium or Low. The tools mentioned above, support the supply partners and the business with monitoring, implementing and remediation steps to strengthen against risks associated with Modern Slavery.

Our supply partners with potential of having high risk in Modern Slavery were found to be in the Produce Category, whereas Low risk partners belonged to the Produce & Packaging categories. This outcome of having supply partners in both high and low risk categories demonstrate how effective controls and remediations steps taken by businesses can reduce the risk of modern slavery regardless of the inherent risks.

Visual representation of our supply partners



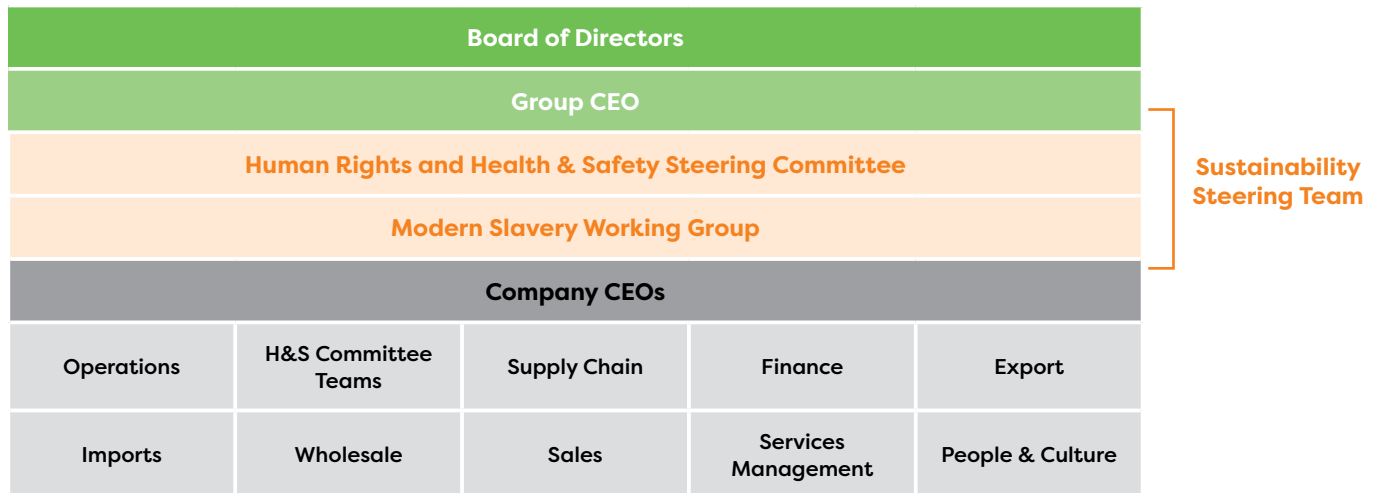
Spend of Country by origin



DUE DILIGENCE, MITIGATION & REMEDIATION

Freshmax has focused its effort on understanding any potential gaps in the supply chain and strengthening measures already implemented within Freshmax operations.

The following structure is in place to identify and assess potential risk areas:



Internal Processes and Policies

Freshmax has continued to increase the efforts to empower people not only by rolling out company core values but also taking strategic steps to manage risk of Modern Slavery within our business and supply chain.

At Freshmax, all employees directly employed by the business are engaged with clear and comprehensive contracts that are created in line with the National Employment Standards and comply with the Fair Work Act 2009 and the appropriate Industry Awards and Requirements. All employees working at Freshmax operated warehousing or packing facilities, are made aware of all the Policies and Standards mentioned below:

POLICIES AND STANDARDS	
Business Conduct Policy	To succeed in becoming a successful requires the highest standards of behaviour from all of our team. The company has earned a reputation for conducting its business with integrity and with respect for the interests of those our activities affect. This reputation is an asset, and this standard supports the business in sustainably conducting the business activities.
Ethical Sourcing Policy	<p>The company is committed to being a responsible corporate citizen and a contributor to the communities it serves.</p> <p>The company is committed to sourcing products in an ethical and responsible manner, with due consideration for the welfare and health & safety of people as well as environmental impact.</p> <p>With this document, the company shows commitment to work with all of its supply partners to attempt to set and maintain standards and practises that will benefit all stakeholders to create a sustainable supply chain.</p>
Human Rights Policy	The Company’s Human Rights is based on internationally recognised human rights principles, as a minimum those set out by the International Bill of Human Rights. With his standard, the business embeds our commitment to respect human rights in all business areas and processes by identifying, preventing and mitigating potential adverse human rights impacts that we may cause or contribute to by our business activities.

POLICIES AND STANDARDS

Code of Conduct

This Standard seeks to provide a framework and set out expectations for behaviour of team members. The guidelines outlined in this document, support each of the team members to enjoy working and create confidence in our customers and our supply partners.

Email and Internet Use

The Company provides its team with Internet access and electronic communication services as required for the performance and fulfillment of job responsibilities. The aim of this policy is to outline what is acceptable use for email and the internet.

Drug and Alcohol Policy

The Drug & Alcohol Policy is in place to ensure that the workplace is free from the adverse effects of drug and alcohol induced performance impairment.

Anti Bullying and Anti Harassment Policy

The aim of this policy is to provide a workplace where all people can achieve their potential and team members can conduct their normal work duties without fear of intimidation or harassment of any nature.

Anti Discrimination Policy

The Company has an obligation to provide equal employment opportunities to all employees, or potential employees. Discrimination on any basis is not condoned by the business and by this policy, the business further shows commitment to provide all persons with an opportunity to present their case for employment or advancement.

Dispute Resolution

To facilitate a structured resolution where a dispute within the workplace may directly affect an individual staff member, or group of staff members, and may also result in detriment to the company's business or productivity, this standard has been developed and implemented to guide to come up with and effective resolution.

Mobile phone and Device

The company is committed to promoting safety and responsible use from all of its team members. To ensure that this commitment is followed through, the company has adopted a mobile phone policy that requires all individuals to operate company phones and devices in a manner that ensures the professional conduct, including not using phones in moving cars, forklifts or machinery if not fitted to an approved hands free system.

Whistleblower Protection

Freshmax is committed to promoting a culture of corporate compliance and ethical behaviour in accordance with its core values. This Policy recognises that the protection of whistleblowers is integral to fostering transparency, promoting integrity, and deterring and detecting misconduct & wrongdoing.

The business believes that the best way to fulfil this commitment is to create an environment where team members who have concerns about unacceptable behaviour, misconduct, or wrongdoing, feel safe to report it without fear of reprisal.

This Policy is designed to complement Freshmax's normal communication channels and is not intended to restrict Freshmax Representatives from raising issues and discussing grievances and concerns with appropriate Line Managers.

Environment Policy

By implementing this standard, we care about our natural world, our lands, rivers and oceans and all they contain. We are committed to doing business in an environmentally responsible manner and minimising our environmental impact.

Health and Safety Policy

The business accepts that we are ultimately responsible to provide and maintain for all of our team members a working environment that is safe and without risks to health. By developing Health and Safety Policy, the company shows commitment to provide supporting framework and appropriate environment to be able to do justice by the same.

POLICIES AND STANDARDS

Privacy in Workplace The Company is committed to ensuring that it complies with all 13 Australian Privacy Principles (APPs) set out by the Privacy Act. These principles regulate the way the Company can collect, use, disclose, amend and pass on personal information.

Protected Disclosure The aim of the policy is to ensure that the Company operates an appropriate internal procedure for receiving and dealing with information about serious wrongdoing in or by and one inside or associated with the Company in accordance with the provisions of the Public Interest Disclosure Act 2013 in Australia and the Protected Disclosures Act 2000 in NZ.

Leave Policy The purpose of this policy is to establish procedures and guidelines for Employees who wish to take personal (sick or carers) leave as per Fair Work guidelines.

Additionally, the business has taken the below steps to ensure consistent management of employee welfare:

- To demonstrate that **WE CARE**, the business has rolled out the **Employee Survey**. This survey allowed the business to identify the most important issues affecting the team and hence focus on developing appropriate remediation and effective mitigation plans.
- Wellbeing Calendar** has been rolled out with a large focus on:
 - Wellbeing Infographics
 - Wellbeing Activities



- Injury Management and Return to Work plans** were developed.
 - Return to Work Coordinator was appointed
 - Return to Work packs were developed
 - Injured Employees were successfully facilitated back to work

- Care plans** developed for workers with non-work-related injuries to successfully facilitate their transition back to normal duties.

- A structured training program** was designed and delivered to the Executive Leadership Team during this reporting period and the team was provided training in Safety & Employee Management; including but not limited to Legislative Framework, Vacancy Management, Recruitment, Anti-Discrimination, Working Rights, Privacy Obligations, and Contractor Management.



Care Plan	
Details	
These care plan arrangements are for:	
Name	
Job Title	
Location	
Department	Freshmax Australia
Date / Hours of work	
Care Plan Arrangements	
Addressed Requirements of Job/Tasks	Support Details
Personal Health & Safety	<ul style="list-style-type: none"> The individual will self-manage and engage with their manager and treating medical practitioners if existing condition where no resolution of these symptoms/conditions arises.
Workplace supports, aids or modifications to be provided	
Identify workplace supports, aids or modifications, eg. Desk height, buddy system, special tools, equipment, training, etc.	
Specific duties or tasks to be provided	
Identify the specific duties and tasks that are to be avoided or restricted, eg. No loading pallets, don't lift any tasks to be undertaken with the assistance of another person.	
Medical Restrictions	
Identify the restrictions. These will be the worker's doctor or health-care provider, other medical information provided. What date or period(s) do these restrictions apply?	

External Supply Chain Processes

Currently 100% of Freshmax's directly controlled warehouses in Australia are registered with SEDEX, have completed a self-assessment questionnaire (SAQ) and have gone through at least a SMETA 4 pillar audit in the past 12 months to lead by example.

Out of the 176 social audits that our supply partner sites have gone through, 50 were undertaken for this reporting period.

The top five audit findings in our supply chain are as below:

- Lack of appropriate Grievance Mechanism
- Inadequate chemical storage & handling
- Insufficient electrical safety risk assessment
- Lack of system to adequately monitor Labour Hire Provider
- Inadequate eye wash/shower station

The business has developed the Supplier Code to better communicate the business's commitment to the supply partners throughout the supply chain. This Code describes the Business Conduct Principles including but not limited to:

- Requirement of compliance to local laws and regulations.
- Information Confidentiality
- Employee treatment
- Prohibition of forced labour & child labour
- Workplace free from discrimination, harassment, or any form of abuse
- Employees right to freedom of association and collective bargaining consistent with local law
- Providing safe & healthy workplace
- Anonymous reporting of suspected violation of the Code

Remediation

Where we identify any issues through our due diligence process, we will act immediately to address any non-conformity, and in the event of any instances of Modern Slavery, we will ensure remediation and address the cause.



ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Freshmax is striving continually to understand and assess the effectiveness of the initiatives outlined in this statement and identify opportunities for improvement for in broader activities and initiatives taken across the business that impact human rights to develop a plan and framework for ongoing assessment.

2021-2022 saw Freshmax taking proactive steps towards increasing engagement with their Tier 1 suppliers. Through increased utilisation of the Sedex, FairFarms and CENTRL platforms, Freshmax has been able to better identify potential modern slavery risks and recognise potential steps to further support better working conditions for workers in the supply chain. Additionally, an annual self-assessment questionnaire was used to identify changes within business's own operation that may warrant further improvement. This effort has helped Freshmax to better evaluate and initiate mapping their entire supply chain over the coming years.

The Freshmax Framework is designed to monitor and evaluate the effectiveness of our systems for control of Modern Slavery Risks:

Governance	<ul style="list-style-type: none">• Modern Slavery Working Group• Review of internal Policies and Procedures• Board Reporting
Risk Management	<ul style="list-style-type: none">• Self-Assessment Questionnaire (SAQ)• Risk assessments• Internal Audits• People & Culture Committee
Monitoring	<ul style="list-style-type: none">• Site Audits• Supplier Audits• Communication and Acknowledgement• Training participation
Grievance Mechanism	<ul style="list-style-type: none">• Whistle-Blower Policy• Complaints & Investigation

Freshmax's Approved Supplier Program is an established process which requires us to continue reviewing the supply chain. This reporting period, the appropriate team members within the organisation are reviewing the supplier membership, completion/update of the site SAQs, third party audit completion along with and non-compliance close outs in timely manner and communicating the outcomes of this exercise in timely manner to respective team members within the organisation.

For the reporting period, all 50 of our Tier 1 Suppliers that have gone through an independent social audit have addressed any non-compliance that may have been raised to achieve appropriate compliance to ILOs within the audit scope.

PROCESS OF CONSULTATION

Freshmax as a group is committed to developing a collaborative approach to addressing the risks related to modern slavery.

This statement was developed in partnership with representatives from procurement, people & culture, legal, ethical sourcing and operations. All these representatives have convened during the reporting period to discuss and develop the actions mentioned in this statement.

This statement has been reviewed by our modern slavery working group and has been approved by the group CEO and the Freshmax board members.

Throughout the reporting period, members of the Modern Slavery Working Group worked closely with different business units within the group to better understand and mitigate the specific modern slavery risks faced by each of these businesses based on their different geographical locations and operational diversity.

ADDITIONAL INFORMATION

Despite the challenges faced by the industry as a whole owing to factors such as labour shortage, shipping delays and abnormal weather patterns, the steps taken by the Group as a whole has thrusted the business in a positive direction.

The roll out of the Core Values and rolling out the Employee Survey by the group in Australia has gained the trust of and empowered the team members that help the business not only sustain but also grow leaps and bounds.

The actions taken by the Group to endeavour to assess the Modern Slavery Risks within its operations and supply partners (including but not limited to Produce, Packaging, Consumables, Services and Transport) have reinforced the vision of achieving a sustainable continuous improvement program.

LOOKING AHEAD

At Freshmax, we are proud of the progress we have made in better understanding our role and also the potential Modern Slavery risks within our supply chain. However, we also acknowledge that we are only just at the beginning stages with a lot more that can be done with collaboration and support with both internal and external stakeholders.

System and Reporting

The Modern Slavery Working Group is committing to come together to develop and implement the below over the next reporting period:

- Sustainability Policy
- Psychological Health and Wellbeing Standard

At the same time, it is also committed to produce the company Sustainability Report in collaboration with internal stakeholders and supply partners.

Over the next 12 months the business is also committed to review and update its internal Policies, Standards and SOPs to appropriately accommodate the robust requirements of the ever-evolving industry needs for sustainable business operations.

Training and Communication

Freshmax will continue working towards Continuous Improvement, keeping in mind the four pillars of the group vision: for the better of our people, better for our suppliers, better for our customers and better for our company and the Core Values of the Business by committing to communicate the company Policies, Standards and other appropriate documentation to the wider team.

To increase the awareness of employees regarding the rights of entitlement within the business, Freshmax will offer the non-English speaking employees in Australia, the English Language classes which will focus on improving general workplace understanding of the language use.

The business also commits to review internal training program standard and make necessary updates to further define specific frequencies and accommodate the changes as required.





APPROVAL OF STATEMENT

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth) (the Act) for the year ending September 30, 2022.

This Statement was approved by the Board on the 27th of February 2023.

This statement has been approved by

.....
Murray McCallum
Group CEO, Freshmax Group Pty Ltd