

MODERN SLAVERY STATEMENT 2023

Introduction

This Modern Slavery Statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) (Act). This Statement is provided by Rugby Farming Group Pty Ltd (whose registered office is at 22 Hoods Road, Gatton in the state of Queensland) and addresses the operations and supply chains of its related entities and subsidiaries which include Rugby Farm Pty Ltd, Rugby Marketing Pty Ltd, Rugby Employment Pty Ltd, Rugby Regional Employment Pty Ltd, Rugby Equipment Pty Ltd, Rugby Transport Pty Ltd and Freshwayz Equipment Pty Ltd.

In accordance with the Act, this Statement sets out the steps the Rugby Farming Group Pty Ltd has taken from 1 July 2022 to 30 June 2023 to identify and assess the risks of modern slavery in our business and supply chains.

The Rugby Farming Group Pty Ltd is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our group. We will not tolerate any forms of slavery or human trafficking in our business. This policy confirms our commitment to uphold the human rights of workers, and to treat them with dignity and respect. This applies to all full-time, part-time, casual and contracted workers.

We are further committed to paying employees and providing conditions of employment in accordance with an applicable and lawful industrial instrument approved by the Fair Work Commission and to the standards set in the Fair Work Act 2009.

Rugby Farming Group confirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

About Us

The Rugby Farming Group Pty Ltd is a large Australian farming operation, growing, packing, processing, and transporting fresh produce to supply both the domestic and export markets with fresh vegetables grown on our farms, 12 months of the year. Our key customers include some of the major supermarket chains. We consistently employ over 1000 people to grow, pack and transport our produce.

Produce supplied by the Rugby Farming Group includes Baby Broccoli, Broccoli, Cauliflower, Celery, Green Beans, Iceberg Lettuce, Cabbage, Baby Corn, Sweet Corn, Pumpkin, Wombok and convenience packaged produce. We produce approximately

15,000 acres of vegetable crops each year strategically located across Queensland's abundant growing regions.

The Rugby Farming Group Pty Ltd has properties located in:

- Lockyer Valley – Gatton, Lowood and Fernvale
- Darling Downs – Clifton
- Southern Queensland – Amiens, Kyoomba and Listern
- North Queensland – Bowen and Ayr

Each of these locations has been selected due to ideal climatic conditions, plentiful supplies of clean, fresh water and uncontaminated fertile soils; all essential to consistently deliver exceptional quality produce.

To meet our customer's needs, we also source produce from other Australian growers and suppliers.

We have a fully accredited food safety programme and follow industry best practice and standards to assure our quality consistently meets the needs and expectations of our customers.

Risks and Management Actions

The management of Modern Slavery risk in our operation and supply chain is guided by the Rugby Farming Group Pty Ltd and its entities, Senior Executive and Board. We recognise that a Modern Slavery and Human Trafficking risk may be present in our organisation and extended supply chain.

We conduct audits of our suppliers and contractors to verify their compliance with the Modern Slavery Act. We acknowledge that the risks of Modern Slavery may be heightened in our group's supply chain and operations because of the geographical location of some packaging suppliers, particularly in Asia. We understand that there is a lower risk of Modern Slavery amongst the number of Australian Growers who we source produce from. This risk is something we will continue to monitor.

We have a long-standing commitment to human rights and the prevention of forced labour. We enforce our Whistleblower, Grievance, Child Labour and No Forced Labour policies which are approved by the Board. We are committed to respect human rights, to ensure workers have the right to freedom of association and collective bargaining, and to prohibit forced, bonded, indentures or child labour. We adhere to accurate remuneration of all employees under the relevant industrial instrument.

We have a continuous commitment group wide to respecting human rights and focus on the condemnation of modern slavery. The implementation of the following rigorous processes to address risks of modern slavery in our supply chain and operations strengthen our resolve in this area:

- Review and modify group policies and procedures to align with the condemnation of this process.
- The Whistleblower Policy which allows employees to raise any concerns of modern slavery and human trafficking within the group.

The Rugby Farming Group Pty Ltd takes a proactive approach to eradicating the Modern Slavery Risk from our operations and supply chain. The Board reviews, assesses and addresses the objectives of the Modern Slavery policy annually.

Assessing Effectiveness

We are building on long-term supplier relationships which will assist over time to safeguard human rights which in turn should lead to an improved understanding of ethical sourcing and human rights.

We are a Supplier Ethical Data Exchange (Sedex) accredited supplier and maintain Horticultural Produce Agreements with all growers who supply us with fresh produce.

The Rugby Farming Group has a dedicated Human Resources team who advise and support our Managers, Supervisors and Team Leaders with employee support and welfare. They stay up to date with current legislation to ensure they remain vigilant for the main human rights risks. This team is also supported by Workplace Health and Safety specialists to ensure that we maintain a safe workplace and culture.

The Rugby Farming Group Pty Ltd and its entities undergo a range of controls to address the risks of modern slavery in the operations and supply chains including:

- Training of employees;
- Anonymous employee feedback forms;
- Review of labour legislation and applicable awards;
- Annual reconciliation of salaries and review of pay rates;
- Reviewing and updating supplier questionnaires;
- Supplier and grower audits.

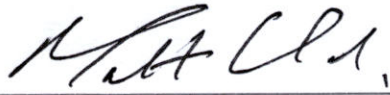
We will continue to assess the effectiveness of our actions in identifying and managing the Modern Slavery risks by tracking our actions and outcomes listed above, partnering with suppliers, and regularly undertaking internal governance and external assurance processes with a view to continually improving our response to Modern Slavery.

Consultation

The Rugby Farming Group Pty Ltd and its entities take a proactive approach to eradicating the Modern Slavery Risk from our operations and supply chain. The Board reviews, assesses and addresses the objectives of the Modern Slavery policy annually. The Board meets with the Senior Management of the entities regularly to ensure they are consulted about the strategies to support this commitment.


Approval

This statement has been approved by the Board of Directors of Rugby Farming Group Pty Ltd on 23rd November 2023.



Matthew Hood

Director



Daniel Hood

Director