



Costa Group Holdings Pty Ltd

# **MODERN SLAVERY STATEMENT 2023**



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## Acknowledgement of Country

In the spirit of reconciliation Costa acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea, and community. We pay our respects where we live work and grow, and across all Costa locations to elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

# MESSAGE FROM THE CEO

I am pleased to present Costa Group's fourth Modern Slavery Statement, covering the calendar year 2023.

In our Australian and international operations in China and Morocco, we take seriously the critical role we play in protecting and promoting the human rights of our workers. Across the agricultural landscape, we also understand the importance of fostering a supply chain that is not only efficient and sustainable but also free from modern slavery.

This Statement outlines the initiatives we have undertaken to address and mitigate the risk of modern slavery during 2023.

As part of our focus on continuous improvement, a key activity for us was engaging an external review of our modern slavery response and actions, conducted by independent consultancy Be Slavery Free. This review has highlighted our strengths, but also key areas where we need to continue to target our energy and efforts as we move forward.

We have also continued to review and refine our policies and processes, including a more targeted approach to identify high risk suppliers.

Our dedicated People Assurance team has also further developed resources and processes relating to labour hire providers, to ensure our labour standards are met.

We aim to equip our employees with the knowledge and resources to identify and call out modern slavery risks, and with a culturally diverse and geographically spread workforce we will continue to develop new tools to ensure communication is provided across our business.

We also recognise the need for continuous improvement and we remain steadfast in our commitment to upholding and protecting the rights of our workers across our operations.

Marc Werner  
Chief Executive Officer

## STATEMENT ON THE REPORTING ENTITY

As of February 26, 2024 Costa Group Holdings Pty Ltd (Costa) is a private company owned by Paine Schwartz Partners, Driscoll's and British Columbia Investment Management Corporation.

The head office location is Level 5, 818 Bourke Street, Melbourne. This Statement has been published in accordance with the Modern Slavery Act 2018 (Cth) (MSA or Act). It covers Costa Group Holdings Pty Ltd and its wholly owned entities.

This Statement also covers African Blue SA, and its subsidiaries, including Sweet Berry SA and African Blue (UK) Pty Ltd (together African Blue), which is a joint venture between Costa and Total Produce Pty Ltd, and the Costa Driscoll's joint venture in China.

A full list of Costa's Australian and international subsidiaries, which are covered by this Modern Slavery Statement, is included in Appendix A.

This Modern Slavery Statement was approved by the Board of Costa Group Holdings Pty Ltd on May 17, 2024.

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# Where We Operate

## Western Australia

**Berry Farms**  
Gingin, Neergabby

**Compost Facility**  
Mandurah

**Distribution Centre**  
Jandakot

**Mushroom Farm**  
Casuarina

**Select Fresh Group**  
Canning Vale

## South Australia

**Adelaide Wholesale Market**  
Pooraka

**Citrus Farms**  
Amaroo – Murtho, Pike Creek – Lyrup,  
Solara – Loxton, Bookpurnong

**Kangara Citrus Farm and Packhouse**  
Murtho

**Mushroom Farm**  
Monarto

**Yandilla Citrus Farm and Packhouse**  
Renmark



## Queensland

**Avocado Farms**  
Atherton, Paddys Green, Dimbulah, Childers

**Banana Farms**  
Tully, Walkamin

**Berry Farms**  
Atherton, Tolga, Walkamin

**Brisbane Wholesale Market**  
Rocklea

**Citrus and Table Grape Farms**  
Emerald, Dimbulah

**Table Grapes Farms**  
Mundubbera

## New South Wales

**Avocado Farms**  
Comboyne, Fishermans Reach

**Berry Farms**  
Corindi, Rosewood

**Citrus Farm**  
Trentham Cliffs

**Distribution Centre**  
Eastern Creek

**Table Grape Distribution Centre**  
Euston

**Tomato Glasshouses**  
Guyra

## Victoria

**Docklands Support Centre**  
Docklands

**Citrus and Table Grape Farm**  
Colignan

**Citrus Farm**  
Lindsay Point

**Compost Facility**  
Nagambie

**Distribution Centre**  
Derrimut

**Melbourne Wholesale Market**  
Melbourne

**Mushroom Farms**  
Mernda, Yarrambat

## Tasmania

**Berry Farms**  
Dunorlan, East Devonport, Lebrina,  
Nine Mile, Wesley Vale

**Berry Distribution Centre and Packhouse**  
East Devonport

**Devonport Distribution Centre**  
Quoiba

## China



Bailang – Yunnan Province  
Manlai – Yunnan Province  
Guangmen – Yunnan Province  
Manhong – Yunnan Province  
Baoshan – Yunnan Province

## Morocco



Bousselham/Laouamra  
Kenitra, Larache region Massa  
Agadir (southern) region



# 01/ STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## Structure

Costa is an international farming, marketing and distribution company selling produce globally. Through its subsidiaries, Costa owns and operates farms in Australia, China and Morocco and sources fruit through third-party produce supply partners (“produce supply partners”) in Australia, Morocco and elsewhere in Africa and the Americas (see page 5).

Costa owns a controlling share in African Blue SA and its subsidiaries, including Sweet Berry SA and African Blue (UK) Pty Ltd (together African Blue), which is a joint venture between Costa and Total Produce Pty Ltd. Costa operates a separate joint venture with Driscoll’s Inc in China, growing berries for sale into the local Chinese market. These entities are all covered by this Modern Slavery Statement.

Costa also operates a joint venture with Driscoll’s Inc in Australia and New Zealand to supply fresh berries to this region through Driscoll’s Australia Pty Ltd. As Costa has a 50% interest in that joint venture rather than majority ownership, its operations are not included in this Modern Slavery Statement and the joint venture will report separately in its own Modern Slavery Statement.

## Employees

The seasonal nature of the Costa business necessitates that our direct and indirect employee numbers will vary during the course of the year and in 2023 our workforce comprised 10,778 full time equivalent workers. This number includes our Morocco and China employees.

In 2023, approximately 82% of Costa’s direct hire operation staff in Australia were covered by enterprise (certified) agreements. This figure excludes salaried employees.

In 2023, our employees (based on full-year employees) included people from 91 different nationalities.



# STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## Operations

Costa is Australia's leading grower and marketer of fresh fruit and vegetables. Costa's operations include more than 7,200 planted hectares of farmland, 40 hectares of glasshouse facilities and three main mushroom growing facilities across Australia. Costa also has strategic foreign interests, with majority owned joint ventures covering six blueberry farms in Morocco and five berry farms in China. Costa is the largest fresh produce supplier to the major Australian food retailers.

As at January 1, 2024 the African Blue operation in Morocco covers 349 planted hectares and in China, the joint venture includes 400 planted hectares.

The Costa business model is built on the optimisation of a portfolio of integrated farming, packing, and marketing activities. Costa's products are predominantly grown and sourced from the company's footprint of domestic and international farms, supplemented with produce sourced through a network of third-party growers.

Costa operates across three segments:

- Produce
- International
- Farms and Logistics

Costa's Produce business operates principally in five core categories in Australia: berries, mushrooms, citrus, glasshouse-grown tomatoes and avocados.

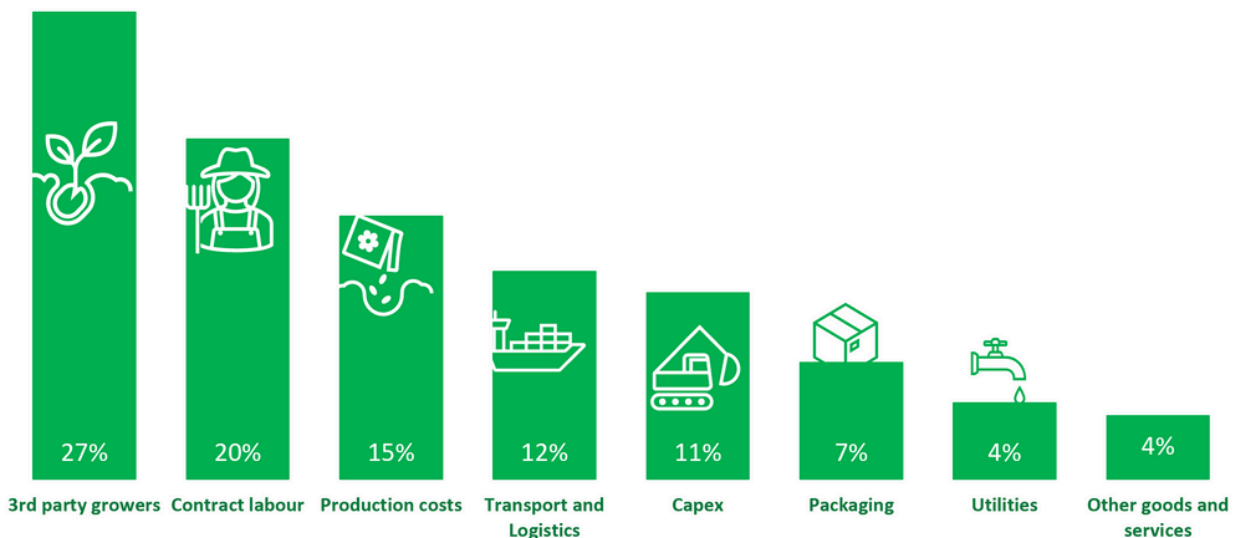
The International business division comprises licensing of proprietary blueberry varieties and berry farming in international markets including Morocco and China.

The Farms and Logistics business division incorporates interrelated logistics, wholesale, avocado marketing, banana farming and banana marketing operations.

## Supply Chain

Costa's operations span multiple continents, and we source products from Australian and international supply chains. Our supply chains also include labour hire and procurement of other services and goods not for resale.

### Supply Chain Expenditure by Category



Graph shows percentage of spend by category of purchase for all Costa operations.

Notes:

1. M&A purchases and land acquisitions are excluded from Capex as they are one-off purchases and do not accurately represent Costa Group's supply chain.
2. Insurance, tax and employee entitlements are excluded from Other goods and services as they do not fall within Costa Group's definition of supply chain expenditure.

# 01/ STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## Produce

In 2023, produce sold by Costa in Australia was sourced from 182 produce supply partners. Costa also imported fruit from five suppliers based in the USA and Mexico. Growers supplying to Driscoll's Australia are not included in references to Costa's produce supply partner base within this statement and will be reported as part of Driscoll's Australia's Modern Slavery Statement.

In Morocco, African Blue exports berries grown by African Blue, its subsidiaries, and licensed growers of Costa blueberry varieties in Africa. In 2023, there were a total of seven produce supply partners in Morocco. African Blue also had three produce supply partners in South Africa and eight in Zimbabwe. The China Joint Venture does not use third-party produce suppliers.

Product	No. of produce supply partners
Avocado	63
Tomato	4
Grape	48
Citrus	7
Banana	8
Other (various fruit and vegetable supplied into wholesale)	52

Table 1: Number of produce supply partners in Australia by product supplied.

Country of origin	Product	Number of tier one suppliers
United States	Grapes	4
Mexico	Grapes	1

Table 2: Number of Tier one International produce suppliers supplying Costa's Australian operations.



# 01/ STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## Labour hire and other services

In 2023, Costa utilised the services of 20 labour hire providers to meet the labour force requirements for harvest in its Australian operations (see page 18).

African Blue uses two labour hire providers in the south of Morocco.

All labour is engaged directly for our farms in China. Labour agencies are used to assist in sourcing labour, and are paid a fee for this service, but the employment relationship is directly with Costa.

A range of other services are used by Costa including: transport services such as road freight (domestic fresh produce transport), sea freight (export of fresh produce), warehousing, cleaning, and security.

## Goods

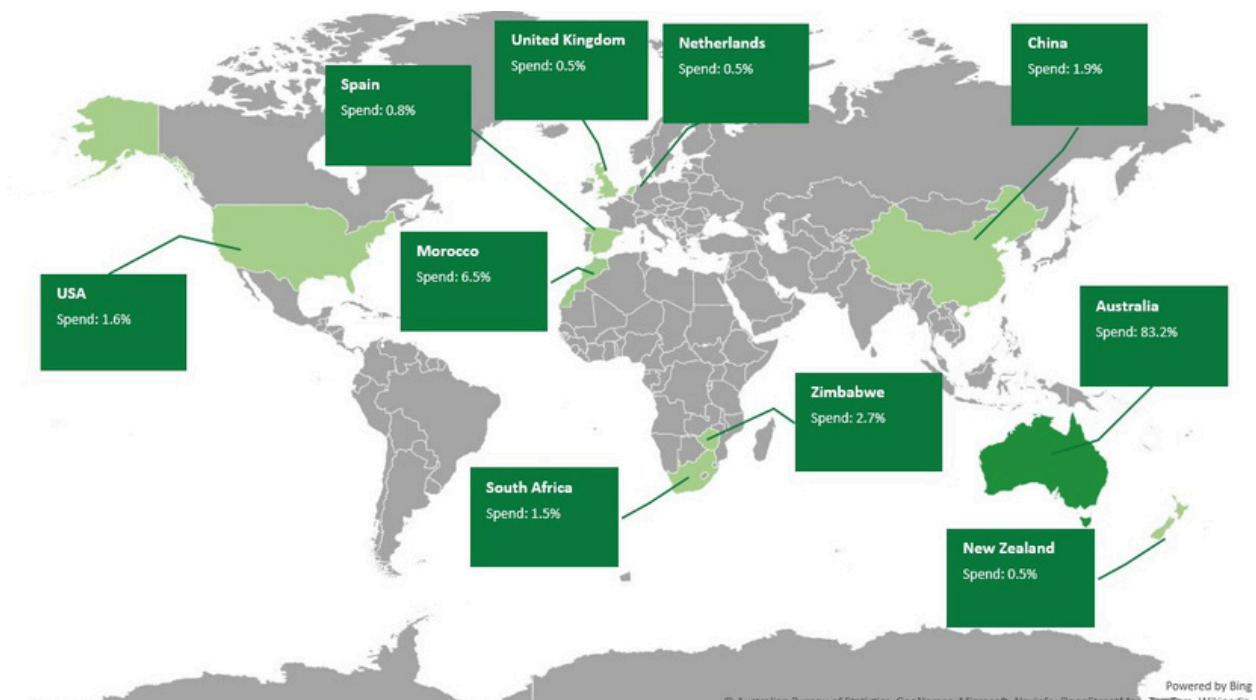
Suppliers provide a range of goods not for resale. The largest categories, excluding produce grown by third-party growers and contract labour, are for production costs, transport and logistics, other goods and services, and packaging.

For our domestic operations, these are predominantly sourced from Australian based companies; however, their supply chains may be geographically diverse ranging from small businesses to global companies.

The map below represents supplier spend by country for Australian and international operations.

We recognise that in some instances companies we engage with as suppliers in Australia may be sourcing products internationally. Where we have identified this as high risk, we work with suppliers to mitigate the risks of modern slavery.

## Supply Chain Expenditure by Country



Map shows top 10 supplier spend by country for Australian and international operations.



A close-up photograph of several ripe raspberries on a branch with green leaves, positioned on the left side of the page. The raspberries are bright red and have a textured, bumpy surface. The leaves are vibrant green and have serrated edges. The background is softly blurred, showing more of the raspberry bush.

## 02/ RISKS OF MODERN SLAVERY PRACTICES

Costa's operations span multiple continents, and we source products from Australian and international suppliers, who in turn have local and international supply chains. Given the large number and geographic diversity of stakeholders operating across the supply chain, Costa recognises there is potential across this complex and dynamic environment for slavery and human trafficking to occur.

The Global Slavery Index (GSI) 2023 ranked Australia 26 out of 27 countries in terms of prevalence of modern slavery in the Asia Pacific region, and 149 out of 160 countries globally. The report identified Australian agriculture as one of the industries at high risk for cases of forced labour to occur.

A report commissioned by Costa in 2023, completed by independent consultants Be Slavery Free, noted that some industries, such as horticulture, have high inherent risk. This is due to:

- Use of a casual and fluid workforce
- Engagement of labour-hire agents
- The time pressures in harvests
- Employees who hold visas related to work status, such as those in the PALM scheme
- Cultural and linguistically diverse workforce where risk of cultural miscommunication is heightened.

In horticulture, the types of slavery identified as being most likely are forced labour, debt bondage and deceptive recruiting for labour or services.

These types of slavery have been identified because the horticultural sector has a high reliance on migrant workers, many of whom have limited understanding of English and who may be less aware of their human rights.

They are primarily undertaking seasonal tasks (ie. picking and packing work) and are often employed under temporary or casual employment arrangements in regional and remote locations. Workers may be on temporary visas, with some of these visa categories binding an employee to a specific employer for the duration of their stay in Australia, for example through the Australian Government's PALM program.

Costa's workforce includes people from 91 different nationalities, many with English as a second language, which is an indicator of possible risk.

## 02/ RISKS OF MODERN SLAVERY PRACTICES

### Operations

Costa has in place robust systems, policies and procedures aimed at protecting the rights of all our employees, and ensuring adequate checks are carried out to minimise the risk of modern slavery occurring.

In our Australian and international operations, where we directly recruit workers the risk of modern slavery occurring continues to be assessed as being relatively low, despite the risks outlined, as we have implemented a number of controls with the aim to mitigate these risks (see section on Due Diligence page 12).

This includes a dedicated People Assurance team, Ethical Sourcing Manager, and a centralised payroll system which monitors work hours and deductions for employees. In Australia certified agreements are in place covering 82% of direct hire operation staff and the remainder are under employment contracts.

In our international operations, all employees are covered by a contract of employment.

Each business unit within Costa, including our international operations, has a dedicated Human Resources team, which is supported by a central HR team.

In our international operations, geographical risk has been identified as we operate in China and Morocco, which are considered to have higher modern slavery risks, according to the Global Slavery Index 2023.



## 02/ RISKS OF MODERN SLAVERY PRACTICES

### Supply Chain

With a diverse supply chain, we understand our risk profile will continue to evolve and we continue to assess our modern slavery risks across our supply chain including due diligence on new suppliers and periodic review of existing suppliers.

The UN Guiding Principles on Business and Human Rights (UNGPS) provides a framework for us to prevent and address human rights abuses including modern slavery. This covers – causing, contributing or being directly linked to harm.

In our supply chain, several key areas have been identified where there is considered to be a heightened risk of modern slavery.

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Potential risks caused by Costa

**Use of labour hire:**

Costa engages temporary and seasonal workers through labour hire companies during certain times of the year. Rigorous controls and due diligence processes are in place for the engagement of third-party labour hire providers to help mitigate this risk.

**Incorrect calculation of piece rates:**

Costa has in place rigorous payroll processes to mitigate this risk. Costa also has a Piecework Framework in place to ensure the correct calculations are made in relation to piece rates.

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Potential risks contributed to by Costa

**Partner growers:**

Costa sources produce from produce supply partner farms which may present a higher risk of modern slavery. A number of our produce supply partners have been selected to undertake third-party social audits to the Sedex Members Ethical Trade Audits (SMETA) standard. We will continue to raise awareness with and provide tools to produce suppliers to assist them to improve in this area, acknowledging that some growers are significantly less resourced. Through our targeted ethical sourcing program Costa aims to monitor, educate and mitigate these risks.

**Certain not for resale goods and services:**

Costa has identified certain not-for-resale goods and services that due to their nature and/or geographical location have an inherently higher risk of modern slavery. These goods and services represent a small percentage of overall spend, and include such items as gloves, solar panels and some chemical inputs or cleaning and security services.

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Potential risks linked to Costa

**Produce from outside the Costa/partner grower network**

A very small percentage of Costa's wholesale business (Costa Farms) acquires some fresh produce through intermediaries such as brokers and marketing agents on a market trading basis often in circumstances where it does not have direct grower relationships.

## 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDATION

Costa has implemented a 2024 Action Plan, which details Costa's continuous improvement approach to modern slavery, including measurable outcomes and deadlines. This is outlined on page 27.

In 2023, specific targets were set to help drive Costa's actions to mitigate human rights and modern slavery risks in our operations, and across our supply chain. Our progress against our 2023 targets is outlined in the table below.

Description	Target	Progress 2023	
External review of our Modern Slavery progress.	Completion by end 2023.	Review conducted in 2023 by independent consultant Be Slavery Free.	Completed
Review and refine processes for assessment of high-risk suppliers.	Completion by end 2023.	Targeted risk assessment process for our suppliers developed in 2023.	Completed
% Australian Growers/ Suppliers on Sedex – or equivalent.	100% direct growers	In 2023 91% of Costa's Australian produce supply partners were registered on Sedex.	Ongoing
	100% labour hire providers		Completed
	100% of all other suppliers identified by Costa as High Risk.	91% of suppliers identified as High Risk are registered on Sedex or have a Modern Slavery Statement or policy in place. A small percentage of suppliers remain non-compliant, particularly sole traders or small business.	Ongoing
Advanced Awareness Raising training for people in key roles	100% of people currently in key roles* have participated in Advanced Awareness Raising training during 2022/2023.	100% completion of the e-learning module on Tackling Modern Slavery by members of identified key role groups including the Costa Board and Executive, People and Culture, Procurement and Legal.	Completed
	Train people newly entering key roles within six months of their commencement in that role.	In addition to key roles (as above) an annual review of people with key responsibilities outside of those job roles is undertaken to ensure training compliance.	Completed

## 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

Description	Target	Progress 2023	
General awareness training and communication	General Awareness Training Modules included in Costa Online Learning Management System.	As access is not currently available to the Learning Management System for all users, other methods, including Toolbox Talks, were used for general awareness training in 2023.	Ongoing
	Use additional tools for communication as required, including Toolbox Talks.		Ongoing
	General awareness communication to be provided to 100% of partner growers.	Ethical Sourcing Bulletins distributed.	Ongoing
	Whistleblower hotline information available in local languages across 100% of sites.	Whistleblower information in language provided to each site for display. Audits conducted during 2023 to ensure compliance.	Completed
Audits	10% of grower sites audited within the 2023 reporting period.	In 2023 18% of grower sites were audited.	Completed
All suppliers to the Australian business to be provided the Supplier Code of Conduct**	100%	Issued automatically to all new vendors.	Completed

\*Identified key role groups are Costa Board and Executive, People and Culture, Procurement and Legal and who have significant labour management and/or supervisory responsibilities.

\*\*This excludes the one time and irregular suppliers that are paid for by corporate credit cards that are not registered as suppliers in SAP.

## 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

### Working Group

The Costa Modern Slavery Working Group, established in 2021, continues to ensure a co-ordinated and collaborative approach to tackling modern slavery and respecting human rights.

The Working Group's purpose is to review and advise on the strategic direction and performance of Costa's modern slavery response, and to support Costa to deliver a meaningful response to modern slavery.

The Working Group is a cross-functional, skills-based working group that provides advice and recommendations on policies and processes to tackle modern slavery and assists with implementing required actions.

The skills and experience of Working Group members include ethical sourcing, human resources, legal, communications, procurement and operational experience in the sections of Costa's business considered to be most vulnerable to modern slavery. The expertise and skills of the Working Group is regularly reviewed to ensure they support the achievement of the purpose of the Working Group.

The Working Group periodically reports back to the Executive on Modern Slavery remediation progress and strategies.

### Modern Slavery Review

In 2023, Costa engaged the services of Be Slavery Free, an independent consultancy, to conduct a review of Costa's approach to addressing modern slavery and advise on modern slavery strategy content and its framework, including addressing modern slavery risks, prevention and mitigation strategy.

The review included:

- Desktop review
- Workshops with the Modern Slavery Working Group
- Engagement with associated teams such as general managers of produce categories, Risk and Compliance, People Assurance, the Pacific Labour team and Procurement.

The report highlighted current strengths, strengths to be grown and recommendations to further extend Costa's response, across the following areas:

- Embed responsible business structure into management systems
- Identify and assess adverse impacts
- Cease, prevent or mitigate adverse risks
- Track implementation and results
- Communication.

Overall the report was a positive review of the steps we have taken thus far and highlighted current strengths and strengths to be grown.



Among the strengths identified were: training for permanent staff; strong internal reporting; senior management who are actively engaged; skilled staff with acumen supporting the business; recognition of issues related to doing business internationally; and extensive well managed audit processes.

The report has also provided Costa with recommendations to further extend our response to modern slavery. These recommendations included ideas for broader engagement into the future with major retailers and industry players; enhanced engagement/training with the casual workforce; and some strategies to help Costa strive beyond a risk and compliance mindset towards a duty to prevent.

The findings from this report are being reviewed and evaluated by our executive and relevant actions will be incorporated into the 2024 Action Plan or future action plans as appropriate.

## 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

### Policy Framework

Costa has a comprehensive suite of policies that reflect our core values, and which outline our ways of working and expectations for our employees and suppliers. Policies are reviewed and updated on a regular basis. The following policies are most relevant to preventing modern slavery:

<b>Human Rights Policy</b>	Applies across all of our locations and demonstrates our commitment to respecting internationally recognised human rights. It sets out our expectations for the conduct of our employees and suppliers. The Human Rights Policy further aligns our approach to the UN Guiding Principles on Business and Human Rights Framework.
<b>Whistleblower Policy</b>	Provides a mechanism to encourage concerns to be raised about illegal or unethical conduct or behaviour by Costa and its employees and others authorised to represent Costa. An independently operated whistleblower hotline is also available for all workers on our farms (including labour hire workers) and other stakeholders.
<b>Recruitment and Selection Policy</b>	Sets out our recruitment and selection practices to be fair, equitable and free from discrimination. This includes eligibility to work in Australia and compliance with child labour laws.
<b>Code of Conduct</b>	Sets out the values, commitments, ethical standards, and policies of the Company and outlines the standards of conduct expected of our business and people.
<b>Supplier Code of Conduct</b>	Articulates Costa's expectations and requirements for all suppliers. Costa expects suppliers to respect and be accountable for compliance with this Supplier Code and to develop the necessary tools, record-keeping, and management systems to support this compliance.
<b>Complaints Procedure</b>	The complaints procedure flow charts provide information on the key steps to follow for personal workplace grievances (such as discrimination, harassment or bullying in the workplace) to ensure the situation can be dealt with in an effective and prompt manner.
<b>Anti-Bribery and Anti-Corruption Policy</b>	Supports and supplements Costa's Code of Conduct and Whistleblower Policy and is designed to promote and reinforce Costa's culture of and commitment to lawful and ethical behaviour.
<b>Costa Labour Standards</b>	This standard sets out the Company's commitment to ensuring the health and wellbeing of its workers, whether sourced directly by Costa or through a Labour Hire Provider (LHP).
<b>Sexual Harassment Policy</b>	Sets out standards of behaviour and conduct in relation to sex-based and sexual harassment.

## 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

### Due diligence

#### Ethical Sourcing Program

Costa's expectation is that all workers employed within the farming and packing operations in our own business, and that of our produce supply chain, are employed fairly, treated with dignity and their human rights are respected.

In addition to ensuring that our direct employees are treated fairly and in accordance with all relevant laws, our challenge has been to better understand the social sustainability practices of our produce supply partners and to build capacity with our suppliers to identify and reduce the risk of modern slavery in our suppliers' businesses and supply chains.

Our approach to Ethical Sourcing is:

- Clear communication of our expectations in the form of the Supplier Code of Conduct.
- Identifying and assessing risks.
- Providing support and information through the use of the Ethical Sourcing Bulletin and support guides to mitigate risks.
- Providing remediation support if required.

In Australia, 41 of our own sites have completed self-assessment questionnaires in Sedex and we continued our rolling program of Sedex Members Ethical Trade Audits (SMETA) on 28 of these sites, 17 of which were audited in 2023. The sites selected for audits are a cross section of all Costa categories and site functions including, farms, packhouse and distribution centres. These audits are focused on labour and health and safety.

They are undertaken by an independent third-party certification body and strengthen our monitoring and due diligence of modern slavery risks within our own business. These audits are required to be undertaken during harvest season and if any issues are identified, remedial actions are agreed, implemented and then verified by the independent certification body.

As part of our rollout of Sedex within our supplier base, Costa is requiring its primary Australian suppliers to register on Sedex and complete self-assessment questionnaires (SAQ). These entities include produce growers, contract packers, ripening centres, labour hire providers and targeted procurement suppliers.

In Morocco, all eight of our own sites completed SAQs in Sedex in 2022 and all of these sites have also been audited to SMETA in 2023.

In China, our farms in all three regions have completed SAQs in Sedex. These are being used as an internal assessment and management tool.

#### Procurement

Our commitment to ensuring human rights are protected extends to our supply chain and our expectations are communicated through our Supplier Code of Conduct.

Costa values integrity and honesty in its business and seeks out these qualities in its partners and employees. Costa seeks to engage in business with other likeminded persons and entities that share the same principles and values.

Costa requires all its suppliers to comply with all applicable laws and, in all cases, to meet the standards and principles set out in the Supplier Code of Conduct. Compliance with such laws, standards and principles is a material consideration for us in assessing every aspect of our supplier relationships.

The Supplier Code of Conduct covers areas including: human rights and modern slavery; health and safety, including safe working conditions and fair wages/compensation; immigration law compliance; and diversity and inclusion.

The Supplier Code of Conduct is incorporated in the Supply Agreements within the domestic supply chain, and all Australian suppliers are provided a copy of the Code as part of the procurement onboarding procedure.

Costa has set a target of 100% high risk suppliers (based on spend and high industry risk classification) to be registered on Sedex or have in place their own Modern Slavery Statements and policies.



### 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

In 2023, for this group of suppliers, we have identified and registered approximately 91% of total vendor expenditure as being compliant.

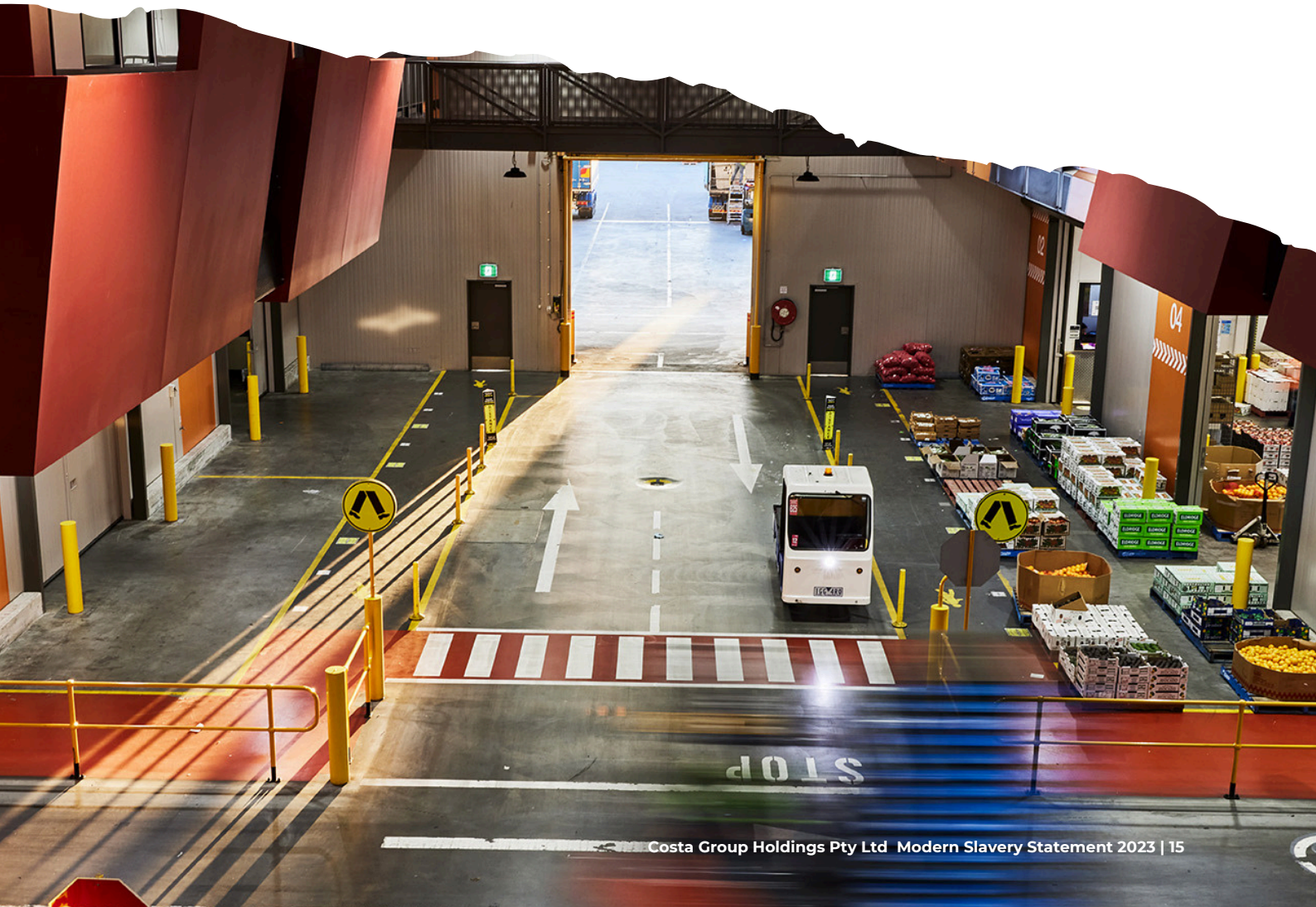
We continue to see sound compliance and suppliers who are aware of their obligations in relation to modern slavery. There is however a small percentage of suppliers who remain non-compliant, particularly sole traders or small business, for which registration and maintaining registration with Sedex poses some challenges, despite our best efforts.

In 2023, further work was done to develop a targeted risk assessment process for our suppliers to enable targeted monitoring and compliance at areas where there is the highest risk.

We reviewed our approach of vendors with the highest spend and high risk industry classification. Internal team knowledge on sourcing practices has helped refine our method of risk categorisation in procurement of goods not for resale.

We also reviewed the risk categorisation using industry data points and team insights into the manufacturing processes and supply chains to target sectors with higher potential risks of modern slavery presence. This included but is not limited to sectors such as transport, warehousing, security and cleaning services, certain PPE items including clothing and gloves.

We recognised that certain sectors require a more bespoke approach such as the provision of accommodation and our People Assurance team (see page 19) has implemented a range of procedures to help to minimise risk in this area. In 2024 we will continue to review and adjust this approach.



# 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

## Produce Supply Partners

Our Ethical Sourcing program is now in its fifth year and we have continued to refine and develop our approach. We use Sedex as a management tool to help the company understand the level and scope of social sustainability practices within our partner grower base. Through the Sedex data platform, we can assess management practices employed by our produce supply partners and work together with them to identify opportunities for improvement, provide support to mitigate risks and to take action where necessary.

As at December 2023, 91% of Costa's Australian produce supply partners were registered on Sedex and shared visibility of their site information with Costa during their supply season. We continue to use this information to risk assess employment management practices and identify the salient human rights issues in our produce supply chain.

We continue to evolve and build on our approach based on the identified risks.

In 2023, we have been transitioning away from the use of the Australian labour hire module to gather data on labour hire use.

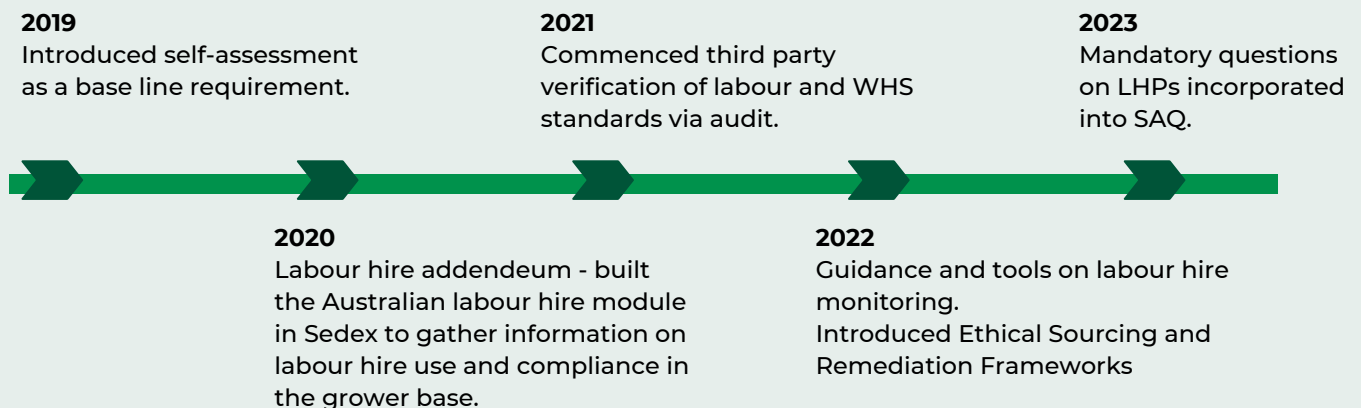
Questions on the use of labour hire and recruitment of migrant workers is now mandatory and incorporated into the core SAQ hosted on the Sedex website. As this is now a mandatory requirement, by mid 2024 Costa will have visibility of all declared labour hire use in the produce supply partner base.

By the end of 2023 47% of produce suppliers had transitioned to this new SAQ. Compliance checks have been undertaken for all disclosed labour hire contractors used. Periodic compliance checks conducted in line with seasonality confirmed that all recruitment disclosed through self-assessment was using formal recruitment chains, either direct recruitment or via labour hire.

All labour hire disclosed by produce supply partners in states with Labour hire licensing Laws were found to hold valid licences. These findings are supported by the SMETA results for growers audited in 2023.

We continue to increase the use of third-party verification within our produce supply base using SMETA. Where compliance issues have been identified, remediation activities have been implemented and verified. 66 produce supply partner sites have been audited to SMETA, 34 of which were audited in 2023 (18%).

## Ethical Sourcing timeline



### 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

Over 90% of audit issue findings are represented across the areas of:

- Workplace, Health and Safety
- Management Systems
- Working Hours
- Regular Employment
- Wages

This is the third year of audits and some growers are now having second audits. Over time there has been a change in the distributions of audit findings, for example there are fewer non-conformances in the areas of discipline and grievance and entitlement to work.

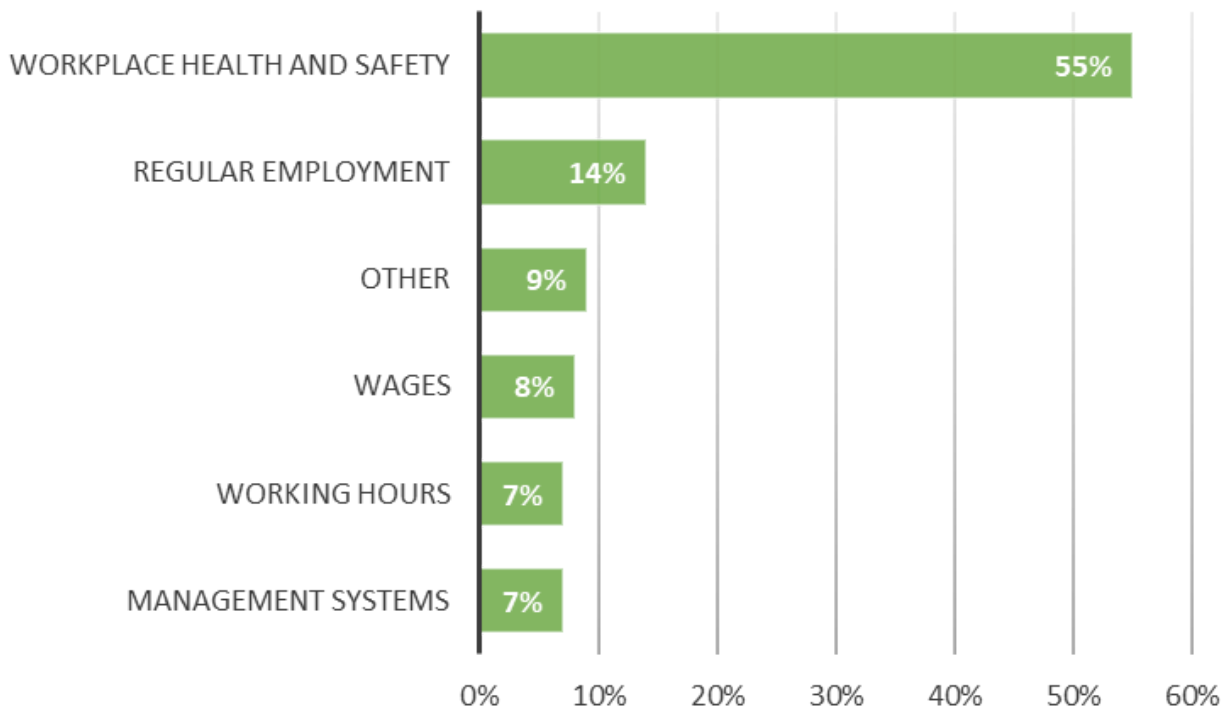
Issues continue to be identified in areas associated with labour hire management. This area will continue to be a focus of remediation and guidance in 2024.

The Sedex risk assessment tool identified a number of possible and strong forced labour

indicators. These were identified in the areas of management systems failures, living conditions and deception.

After investigation of these indicators, it was confirmed there were no findings of forced labour, child labour or debt bondage. In all cases remediation activities were undertaken and have been verified as closed by an independent auditor, in some cases via worker interview and/or a re-audit on site.

In our African Blue operation, 83% of our produce suppliers are registered on Sedex and have completed SAQs. All of these sites have also undertaken a SMETA conducted by an independent third-party auditor. We are continuing to look for ways to further engage and support our produce supply partners with information and guidance on the use of labour hire.



Non-conformance identified during SMETA 2023



## 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

### **Labour Standards**

Costa's Labour Standards policy, which was developed in 2022 covers the engagement and oversight practices of all labour engaged by Costa, including people employed directly and through a labour hire provider (LHP).

These standards provide an equitable framework for the governance of engagement and oversight of labour, along with the commitment to oversight of regulation and licensing of labour hire providers and government approved labour programs.

The Standards cover topics including conflict of interest, code of conduct, workplace health and safety and human resources employment and recruitment processes.

For LHPs, the Standards outline the requirement for pre-qualification assessment and the requirement to provide to Costa a modern slavery action plan within six months of executing a contract with Costa.

### **Labour hire providers**

Costa has 32 labour hire providers (LHP) registered, and in 2023 used the services of 20 providers in Australia.

All Australian LHPs working with Costa must be registered on Sedex, linked to Costa and comply with Costa's Supplier Code of Conduct. LHPs are also requested to undertake a SMETA and must be compliant with any relevant state government labour hire registration schemes.

It is a Costa requirement that all new LHPs complete a pre-qualification application form and provide all supporting documents for assessment before they are engaged. This pre-qualification includes questions relating to modern slavery awareness and risk, and training provided to employees. It also asks LHPs whether they screen suppliers on risks of modern slavery or other forms of labour exploitation.

## 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

### People Assurance Team

In 2023 Costa expanded its People Assurance team to better support the business. The People Assurance Team collaborates with site teams to develop, review, improve and monitor Costa's labour standards, processes and associated HR policies.

They also support teams in preparing for ethical sourcing audits, SMETA audits, and are responsible for undertaking internal audits of direct hire and labour hire engagement processes.

In 2023 six desktop audits were carried out on LHPs currently engaged across the business.

The People Assurance team also conducted a further review and improvement of LHPs' policies, procedures and standards, to ensure compliance with Costa as an organisation and legislative requirements.

The team works with each of the LHPs to help to continuously improve business practices, mitigate risk and to ensure compliance with Costa's Labour Standards, SMETA and legislative requirements.

This has been achieved through activities such as desktop audits, SMETA audits and other additional assessments, checks and inspections.

In 2023 a focus was on enhancing the standard of accommodation provided by LHP to their workers by conducting random checks of the accommodation. LHPs have also continued to improve administrative processes where issues were identified in the previous year.

Costa implemented a Sexual Harassment policy in 2023, which is available to all employees and LHPs. An improved Complaints and Grievance Policy was also under development during 2023.

### Payroll processes

As part of our ongoing commitment to best practice we undertake regular audits and reviews of our payroll processes.

Costa also has in place a Piecework Framework which articulates the process for setting piece rates, meal and rest breaks, and record keeping and systems.

### Intermediaries

Costa's wholesale business (Costa Farms) acquires some fresh produce through intermediaries such as brokers and marketing agents in circumstances where it does not have direct grower relationships.

Due to the transient nature of this trading activity and the inability to require Sedex registration, compliance with Costa's Supplier Code of Conduct has been incorporated into our Terms of Trade.



## 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

### Pacific Island workforce

Costa's diverse workforce includes a significant number of people who are sourced through the Australian Government's Pacific Australia Labour Mobility scheme (PALM). This cohort is critical to support Costa's harvest periods, during which time significant numbers of farm workers are required and there is limited capacity to meet this need from within Australia alone.

Through 2023 Costa continued its focus on transitioning to a centralised, direct employment model for the majority of our Pacific Island workforce. This long-term strategy aims to reduce the reliance on third-party LHPs and therefore further risk of unethical sourcing and modern slavery issues, which is already in part mitigated through extensive accreditations and audits. It also helps to ensure the implementation of consistent high standards for welfare and wellbeing across our entire workforce and our community.

In 2023, more than 1500 Pacific Island workers were sourced from seven nations, working across three categories (berries, tomatoes and citrus).

As part of our strategy, a Costa Pacific Labour Network was launched, which is led by the central Pacific Labour Team and includes all Seasonal Worker Program (SWP) Welfare and Wellbeing staff and SWP Managers across the Costa business. The purpose of the network is to support the development of staff involved in the PALM program and consult on the formulation of national processes and resources to ensure continuous improvement for Costa and our workforce.

A key focus for our teams is also to ensure this cohort is supported as they move into the regional communities in which we operate through pastoral care, and social, volunteering and sporting activities which are actively supported and encouraged. This helps to provide a positive experience for our workers and the communities in which they work and live.



## 03/ MODERN SLAVERY RISKS, DUE DILIGENCE AND REMEDIATION

### Grievance mechanisms

We believe that if we have caused or contributed to an adverse impact to internationally recognised human rights in our own business or that of our supply chain, a fair and just remedy should be implemented.

This is based on the Access to Remedy Principles of the UN Guiding Principles on Business and Human Rights. A worker's rights should not be impacted for raising concern or being involved in an investigation.

Within our own business, Costa has grievance mechanisms in place to identify and escalate issues relating to modern slavery.

Costa has appointed 12 category specific Whistleblower Officers across its businesses, including the Moroccan and Chinese operations. These staff are provided with training as to how to receive and handle reports made under the Whistleblower Policy and afford whistleblower's adequate protection and support.

A whistleblower hotline service independently operated by Deloitte Halo, is available for all workers on our farms (including labour hire workers) and other stakeholders. The reporting service allows whistleblowers to make disclosures via phone, email or through the website [www.costawhistleblower.deloitte.com.au](http://www.costawhistleblower.deloitte.com.au); the service is provided in English, French, Arabic and Mandarin.

In 2023, 12 contacts were made through the hotline. The majority were considered to be personal workplace grievances that were investigated by Costa's HR team, while the other matters triggered a confidential investigation with the outcome then being reported to the person who made the allegation (where contact was possible). Information on any substantive allegations raised and any action taken were included in periodic reporting to Costa's Audit & Risk Committee (with the complainant's details remaining undisclosed).

Details of the whistleblower hotline are communicated via posters, email messaging, toolbox talks and sit prominently on the landing page of the Costa Intranet. Costa's Whistleblower Policy contains a clear reporting procedure to help direct and resolve grievances.

### Remediation

#### Remediation framework

Costa's expectation is that suppliers must provide an avenue for worker grievances to be heard, fairly investigated and where required appropriate remedial action taken. This is outlined in the Supplier Code of Conduct. Our suppliers are responsible for compliance with the Supplier Code of Conduct throughout their business and their supply chain.

The Costa Remediation Framework – Supply Chain was rolled out across the business to provide guidance to suppliers for remediation activity.

The document emphasises the responsibility of suppliers to have a timely, effective remedy, and mechanisms to prevent a reoccurrence, in the event of a non-compliance in respect to human rights.

The framework also incorporates the Access to Remedy Principles of the UN Guiding Principles on Business and Human Rights.

It includes guidance on responsibility, non-compliance, documentation and record keeping, ongoing support and monitoring.



## 04/ TRAINING AND COMMUNICATION

Training and communication continue to play a key role in educating and building capacity within our workforce in understanding modern slavery.

In 2023, we continued to roll out advanced awareness training modules and general awareness communications. These were delivered through a combination of online learning modules, face-to-face sessions, inductions and other communication tools.

### **Advanced Awareness training**

A course titled Tackling Modern Slavery in Businesses – Australia was added to the Costa online learning management system in 2022. Made up of two modules, Stronger Together's Tackling Modern Slavery Australia and Costa's Response to Modern Slavery, the course is mandatory for people in identified 'key' roles which have significant labour management and/or supervisory responsibilities.

This course explains what modern slavery is, and the industries it most commonly affects. It describes signs of potential labour exploitation and explains what employees should do if they believe someone may be being exploited.

The objective of the course is to ensure employees understand: what modern slavery is and how hidden labour exploitation can occur in businesses; how to spot the signs of hidden labour exploitation and how to respond; and know what they can do to help.

In 2023, we have continued to offer this course to new starters in key role groups including the Costa Board and Executive, People and Culture, Procurement and Legal, which has now resulted in 144 employees across Costa having received and completed this in depth awareness training.

In addition, Costa is committed to provide ongoing training, and ensure people's knowledge is refreshed on a regular basis. As part of this, a market review has been conducted on Modern Slavery training providers, which resulted in Costa recommitting to 'Stronger Together' as the most suitable training offering. Preparations have commenced for a refresh of this training, which includes a further expansion of the audience



## 04/ TRAINING AND COMMUNICATION

receiving this training. The target audience will be increased to 322 individuals and leaders across Costa - those with significant responsibilities in the hiring, management and sourcing of people or services.

### **Online learning management system**

A suite of other relevant courses is included in the online learning management system including Conflict of interest, Global Anti-bribery and Anti-Corruption and Information Security Management, Discrimination and Equal Employment Opportunity (EEO), Safety at Costa, Diversity in the Workplace, and Sexual Harassment Prevention.

All salaried staff are required to complete six mandatory online course: Conflict of Interest, Global Bribery and Anticorruption, Discrimination and EEO, Diversity in the Workplace, Safety at Costa and Technology access and Acceptable Use. In addition, courses such as mental health awareness, cultural awareness and developing resilience are recommended.

### **Modern Slavery intranet page**

A dedicated Modern Slavery intranet page with links to it features prominently on the Costa Intranet landing page.

The site contains a range of information including training, definitions and explanations, working group members and links to relevant policies and documents. This site continues to be reviewed and updated to provide practical information and resources.

The People Assurance team has also developed an intranet site with a range of resources relating to audits.

### **Toolbox talks**

Toolbox talks continue to be used widely across the business in Australia and our international operations to provide specific information to targeted groups of employees. They are generally delivered on site by the group's supervisor or leader, and a record kept of who has participated. They are used regularly for providing health and safety information as well as key information relating to modern slavery and associated human rights topics.

This enables us to extend our reach to employees who do not have access to our Online Learning Management System or direct Costa emails.

The following toolbox talks are available to all sites to roll out to ensure our employees are aware of our policies and processes in relation to:

- o Modern Slavery
- o Forced Labour
- o Bribery and Corruption
- o Complaints and Grievances
- o Whistleblower hotline
- o Equal Opportunities, bullying and harassment.

A review of the toolbox talk template was also conducted in 2023, with changes to be implemented in 2024.

### **In person training for first line managers and labour supervisors**

Following an earlier trial that was held in Tasmania with farm manager and labour leaders from the Costa Berry category, the Modern Slavery Working Group started exploring other opportunities to increase access to training across the business. In order to increase accessibility, this may be in virtual and/or face-to-face formats and will be further developed in 2024.

### **Whistleblower information**

All Costa sites, including China and Morocco, display whistleblower posters. Whistleblower toolbox talks are available to all sites to ensure everyone is aware of the Costa Whistleblower Policy and Procedure and know when to raise concerns of suspected or actual misconduct.

### **Additional communication tools**

In addition to the communication outlined previously, Costa delivers a weekly news update to all Australian based employees once a week. This includes information and links relating to modern slavery and whistleblower information at selected points throughout the year.

## 05/ ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Costa continues to monitor the effectiveness of our action, as outlined in this statement, and broader activities across the business which impact human rights, and to further develop a framework for the ongoing assessment of our performance.

In 2023, we assessed our effectiveness through the following mechanisms:

### Governance

#### Modern Slavery Working Group

The Modern Slavery Working Group tracks progress against KPIs.

#### Policy reviews

Costa policies are periodically reviewed and updated when needed to respond to certain regulatory or social headwinds

#### Board and Executive oversight

The Executive receives periodic updates from the Modern Slavery Working Group and during 2023 the Audit and Risk Committee (Committee of the Board) received regular reports on matters including Ethical Sourcing, Workplace Health and Safety and labour hire matters.

### Risk Management

- Audit and Risk Committee
- Enterprise Risk Program
- Internal audits

### Monitoring

- Supplier self-assessment questionnaire (SAQ)
- Supplier audits
- Site visits
- Accommodation audits
- Training participation
- Work entitlements

### Grievance Mechanisms

- Whistleblower Hotline
- Complaints Procedure

We have developed KPIs, included in our 2024 Action Plan, that we use to assess the effectiveness of our actions.

These include: completion rates for modern slavery awareness training; the number of suppliers registered on Sedex. As we continue to develop our Modern Slavery response, we will review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions.



## 06/ CONSULTATION WITH SUBSIDIARY ENTITIES

Costa has developed a company wide approach to managing and mitigating the risks of modern slavery.

Our actions and this statement were developed in conjunction with the Modern Slavery Working Group with representatives from our Australian and international operations across the areas of Procurement, Human Resources, Legal, Ethical Sourcing and Operations.

Representatives across the company have met during the reporting period as part of the development of our activities and this statement and discussed the reporting requirements of the Modern Slavery Statement.

This statement has been reviewed by our Modern Slavery Working Group. Through our Ethical Sourcing Program, members of the Modern Slavery Working group worked closely with the different operational categories to help understand and ameliorate the specific labour risks that faced each category.

## 07/ ADDITIONAL INFORMATION

Costa recognises that modern slavery in horticulture cannot be resolved in isolation. Collaboration and shared learning with like-minded businesses and organisations forms part of our approach. Organisations which Costa has collaborated with include:

### **Be Slavery Free**

Be Slavery Free is an Independent consultancy commissioned to complete a review of Costa's approach to modern slavery.

### **Stronger Together**

Stronger Together, founded in 2013, is a non-for-profit business-led, multi stakeholder collaborative initiative whose vision is a world where all workers are recruited responsibly and have decent work free from exploitation.

### **Australian Fresh Produce Alliance**

Costa is a founding member of the Australian Fresh Produce Alliance, which continues to advocate for enhanced workforce policies including visa arrangements and incentives. AFPA supports the implementation of national labour hire licensing.

### **Berries Australia**

Costa is a member of Berries Australia which has also consistently supported the implementation of a national labour hire licensing scheme.

### **Fair Work Ombudsman's Horticulture Reference Group**

Costa is a member of this Reference Group, which includes representatives of horticulture industry associations, unions, retailers and employers.

## 08/ LOOKING AHEAD

We remain committed to a process of continuous improvement in response to modern slavery risks, across our Australian and international operations.

In recognition of the need to continually review and improve our response to the risk of Modern Slavery, a focus in 2023 was the external review of our Modern Slavery response. While highlighting the achievements we have already made, it also highlights key areas where we can focus attention in 2024.

Throughout 2023 we have continued to focus on improving awareness and understanding and recognise that as a business with a large number of seasonal employees, this will remain an ongoing key area of activity.

We have also continued to develop our processes and platforms, and through our new People Assurance Team have laid a framework for ongoing monitoring of compliance.

Our targets for 2024, which build on our existing Action Plan, are outlined on the following page. This will enable us to continue to track and assess the effectiveness of our actions against modern slavery, and maintain momentum in our efforts to ensure the rights of all our workers, and those within our supply chain, are protected.



# 08/ LOOKING AHEAD

## 2024 Action Plan

Activity	Target
Review/Consider and implement where appropriate the recommendations from our external review of our Modern Slavery progress.	<ul style="list-style-type: none"> <li>• Completion by end 2024</li> </ul>
% Australian Growers/ Suppliers on Sedex – or equivalent	<ul style="list-style-type: none"> <li>• 100% direct growers</li> <li>• 100% labour hire providers</li> <li>• 100% of all other suppliers identified by Costa as High Risk.</li> </ul> <p>(Note: Due to change in suppliers and business acquisitions there may be periods this does not hit 100%)</p>
Advanced Awareness Raising training for people in key roles	<ul style="list-style-type: none"> <li>• 100% of people in identified key roles* have participated in Advanced Awareness Raising training.</li> <li>• Develop process for training harvest supervisors.</li> <li>• Train people newly entering key roles within six months of their commencement in that role.</li> <li>• Training to be refreshed on a biennial basis.</li> </ul>
General awareness training and communication	<ul style="list-style-type: none"> <li>• Use additional tools for communication as required, including expanded use of Toolbox Talks.</li> <li>• General awareness communication to be provided to 100% of partner growers.</li> <li>• Whistleblower hotline information available in local languages across 100% of sites.</li> <li>• Preparation of modern slavery video training.</li> <li>• Add Modern Slavery identification information to induction pack for every new employee.</li> </ul>
Audits	<ul style="list-style-type: none"> <li>• 10% of grower sites audited within the 2024 reporting period.</li> </ul>
All Suppliers to the Australian business to be provided the Supplier Code of Conduct**	100%

\*Key role groups: Executive, People and Culture, Procurement and Legal.

# STATEMENT APPROVAL

This Statement was approved by the Board of Costa Group Holdings Pty Ltd on 17 May, 2024.



Marc Werner  
CEO/Director



Wayne Johnston  
Chief Financial Officer/Director



## APPENDIX A - LIST OF SUBSIDIARIES OF COSTA GROUP HOLDINGS PTY LTD

### Australian subsidiaries:

ACN 151 702 251 Pty Ltd  
 Agri Exchange Pty Ltd  
 AgriExchange Farm Management Pty Ltd  
 AgriExchange Murtho Pty Ltd  
 Banana Exchange Pty Ltd  
 Blueberry Investments Africa Pty Ltd (formerly ACN 057 689 246 Pty Ltd)  
 Blueberry Investments Morocco Pty Ltd CBSP Pty Ltd  
 Costa Group Finance Pty Ltd  
 Costa Group Holdings (Finance) Pty Ltd  
 Costa's Pty Ltd  
 Costa Asia Pty Ltd  
 Costa Berry Pty Ltd  
 Costa Berry Holdings Pty Ltd  
 Costa Berry International Pty Ltd  
 CostaExchange Pty Ltd  
 Costa Exchange Holdings Pty Ltd  
 Costa Farms Pty Ltd  
 Costa Fresh Logistics Pty Ltd  
 Costa Logistics Pty Ltd  
 CBSP Pty Ltd  
 East Africa Coffee Plantations Pty Ltd  
 Exchange Brisbane Pty Ltd  
 Exchange Innisfail Pty Ltd

Fresh Exchange Pty Ltd  
 FruitExpress Pty Ltd  
 Grape Exchange Pty Ltd  
 Grape Exchange Farming Pty Ltd  
 Grape Exchange Farming Mundubbera Pty Ltd  
 Grape Exchange Management Euston Pty Ltd  
 Hillston Investments Pty Ltd  
 Innisfail Holdings Pty Ltd  
 Mushroom Holdings Exchange Pty Ltd  
 MushroomExchange Pty Ltd  
 North Fresh Pty Ltd  
 Raspberry Fresh Pty Ltd  
 Tomato Exchange Pty Ltd  
 Vine Fresh Pty Ltd  
 Vitor Marketing Pty Ltd  
 Yandilla Park Pty Ltd

### International subsidiaries:

Costa Asia Ltd  
 Costa China (Hong Kong) Ltd  
 Costa (Honghe) Fruit Planting Co. Ltd  
 Costa (Yunnan) Agricultural Development Co. Ltd  
 Costa (Baoshan) Agricultural Development Co Ltd  
 African Blue S.A.  
 Sweet Berry S.A.  
 Blue Flavor  
 African Blue (UK) PLC

## APPENDIX B - MANDATORY CRITERIA

Mandatory Criteria	Page number
Identify the Reporting Entity	1
Describe the reporting entity's structure, operations and supply chains.	3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	11
Describe how the reporting entity assesses the effectiveness of these actions.	24
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	25
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	25

**costa**  
well grown