



Modern Slavery Statement 2022

Contents

Group CEO Message

Introduction

Highlights of FY2022

Our structure, operations and supply chain

Our structure	5
Our operations	7
Our supply chain	8

Actions taken to assess and address modern slavery risks

Identifying modern slavery risks	10
Supplier risk assessment	10
Key potential modern slavery risks	11
Our operations	11
Our supply chain	12

Governance, policies and training

Governance	14
Policies	15
Training	16
Industry engagement	16

Due diligence, action and remediation

Our operations	18
Our supply chain	19
Access to remedy: Grievance mechanisms	20

Assessing the effectiveness of our actions and future plans

Consultation process

Regulatory disclosure matrix

2
3
4
5

9

13

17

21

22

23

“Our Growth Strategy is designed to cement the SunRice Group’s position as one of the world’s largest rice food companies, and we are well positioned. With increasing scale and complexity, we remain focused and disciplined in our approach to ensure we grow well, in a way that is aligned with our values, builds resilience in our communities and delivers on our commitment to respect human rights across our business.”

Rob Gordon
SunRice Group CEO



Group CEO Message

Our purpose is to make a difference to places and lives everywhere through nourishing and delicious products. At the heart of who we are as a global food group, our purpose outlines why the SunRice Group exists and why the work our people do, every day, matters.

Sustainability, and a commitment to respecting human rights, is at the heart of how we make a difference and deliver on our purpose. We are committed to securing a sustainable global supply chain to create value for all our stakeholders, and acknowledge the critical role our operations play for the communities that we work in. Our values of integrity, dynamic, collaborative, innovative and community come together in our approach to sustainability.

The violation of human rights is a growing global issue, as labour shortages and social inequality impacts communities across the world. In FY2021, the SunRice Group identified six sustainability priorities as part of our Sustainability Strategy and recognising this complex global labour context, Respecting Human Rights is specifically identified as one of our priorities. Our ambition is to create equity and equality across our operations and supply chain, and this guides our human rights and ethical sourcing actions and approach across the SunRice Group. Aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), our approach acknowledges our commitment to address, prevent and mitigate adverse human rights impacts within our operations and supply chain.

With over 2,000 employees across operations in 10 countries, ensuring a respectful and safe working environment is a priority for the SunRice Group. This year, our activities have focused on

increasing awareness of modern slavery risks in the context of our own operations, including strengthening our risk identification and response procedures for our own mills and processing sites.

As well as our focus on our own operations, we are continuing to implement our Supplier Sustainability Program on a growing scale, and this year we have formalised our due diligence process for our suppliers. We have also further enhanced our governance procedures for the program, focusing on a consultative process across our business to ensure that our program surfaces and responds to risks, whilst being streamlined for our suppliers.

We are committed to partnering with our suppliers, communities, and the rice industry to develop and advance sustainable solutions that respect human rights. Our approach is still evolving, and this is a complex area. However, we are proud of the work we have done to date to build a respectful culture and awareness of our role in respecting human rights within our operations. The positive support received from our suppliers and customers is essential as we strive to achieve our ambition of creating equity and equality across our supply chain.

A handwritten signature in black ink that reads "Rob Gordon". The signature is fluid and cursive.

Rob Gordon
SunRice Group CEO



Raelene White, Store Officer.

Introduction

Modern slavery is an umbrella term referring to situations of exploitation where a person cannot refuse to leave work because of threats, violence, coercion, deception and/or abuse of power.

The term covers all forms of human trafficking, forced labour, debt bondage, the worst forms of child labour,¹ and other slavery-like practices. Modern slavery is a systemic global issue, and we are committed to playing a meaningful role, through targeted internal procedures and partnering with our suppliers and other stakeholders, to progress towards the eradication of modern slavery.

The SunRice Group² is committed to mitigating the risk of modern slavery practices both in our operations and supply chain. This Statement details our approach and the steps taken to continuously strengthen our internal procedures and build effective partnerships with suppliers and other stakeholders to work toward this goal.



This joint statement (the “Statement”) covers Ricegrowers Limited ABN 55 007 481 156 and Riviana Foods Pty Ltd ABN 97 061 388 092, both of which are reporting entities under the *Modern Slavery Act 2018* (Cth) (the “Act”). This Statement also discusses the modern slavery risks and mitigating actions of all other Ricegrowers Limited subsidiaries including SunFoods LLC, as their operations and supply chains form part of the operations and supply chain of the reporting entities.

It is published in accordance with the reporting requirements of the Australian *Modern Slavery Act 2018* (Cth), and also meets the requirements of the California Transparency in Supply Chain Act (2012) and UK Modern Slavery Act (2015). The Statement’s reporting period aligns with the SunRice Group Financial Year 2022, from 1st May 2021 to 30th April 2022. This is our third Modern Slavery Statement, and it was approved by the Ricegrowers Limited Board on 27 October 2022 and signed by Rob Gordon, SunRice Group CEO and a Director of Ricegrowers Limited.

Our approach to Sustainability

Making a difference to the sustainability of places and lives by



Making a difference to our environment

Minimise the environmental impact of our products from farm to table.



Making a difference to our communities

Partner with communities to enrich lives socially and economically, leveraging our expertise wherever we operate.



Making a difference with nourishing products

Create nutritious products to improve the lives of consumers.

1. The full definition of the worst forms of child labour is defined in ILO Convention No. 182 Article 3: www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

2. Ricegrowers Limited (ABN 55 007 481 156) or “Company” is listed on the Australian Securities Exchange (ASX:SGLV). References in this document to the SunRice Group refer to Ricegrowers Limited, Riviana Foods Pty Limited and the other subsidiaries of Ricegrowers Limited – refer to 2022 Annual Report page 131 for full details.

Highlights of FY2022

The Supplier Sustainability Program (SSP) is a suite of initiatives designed to implement the SunRice Group’s Sustainability Strategy, Supplier Sustainability Code and other relevant policies in relation to our commitment to create equity and equality across our operations and supply chain. Our SSP has developed over time and is a reflection of our commitment to continuously improve and adapt as we learn more.

We began our specific work in 2016 with a focus on our policy and governance framework, followed by a deep dive into our supply chain to better understand our suppliers and identify risks. While this work continues, we have focused our attention this year on our own operations and have engaged with our key people to build on our understanding of how to identify and manage risks. We have also worked towards further embedding our due diligence processes into business as usual. Our SSP will continue to grow and evolve over time under the guidance of our expert partners and the SSP Working Group.

As our SSP develops, we hold ourselves accountable for progress against the FY2021 focus areas set out in last year’s statement. Some key highlights from the year are called out below.

FY2022 Highlights



Governance

- ✓ Determination of internal escalation procedure for modern slavery risks
- ✓ Targeted training for employees on human rights risks
- ✓ Targeted training for employees that have responsibilities relating to modern slavery risk mitigation
- ✓ Appointment of Sustainability Manager – Human Rights & Ethical Sourcing to oversee the SSP
- ✓ Refreshed Enterprise Bargaining Agreement covering operations in the Riverina,³ showcasing alignment with the ETI Base Code’s ‘Freedom of association and the right to collective bargaining are respected’



Risk Assessment

- ✓ Consolidation and review of global supplier inventory
- ✓ Refresh of supplier risk assessment
- ✓ Identification of priority suppliers⁴ for further/deeper engagement



Program Monitoring

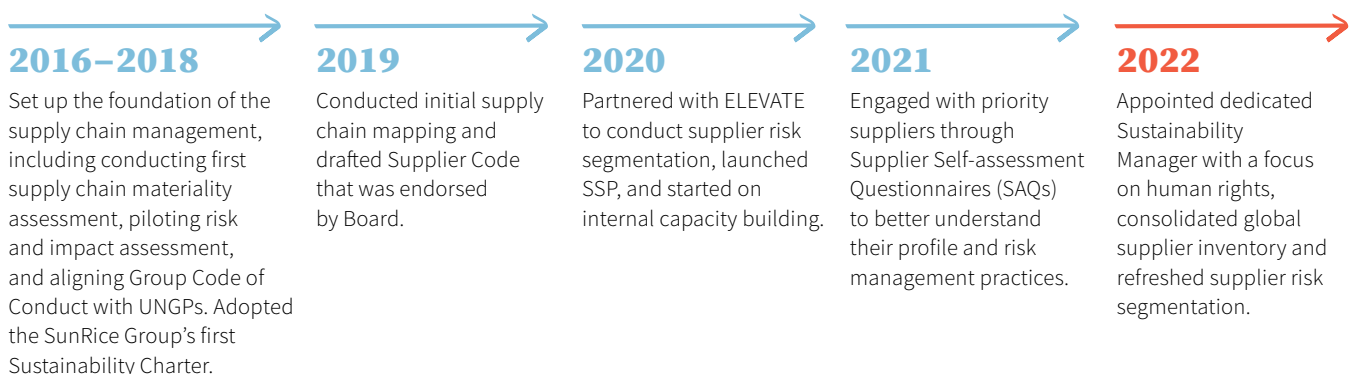
- ✓ Ethical Trading Initiative (ETI) focused due diligence of operations, focusing on high-risk areas including labour hire, young workers, and working hours
- ✓ Undertook SMETA audits at all SunFoods facilities
- ✓ Became SEDEX Buyer/Supplier members to streamline reporting of human rights risks for suppliers
- ✓ Systematically reviewed and formalised due diligence requirements for suppliers



Remedy and Grievance

- ✓ Investigation and escalation of any grievances raised in accordance with the SunRice Group’s Speak Up Policy
- ✓ Outcomes actively communicated to affected stakeholders and used to refine operational processes

Continuous improvement of our program



3. Region in Southern NSW, Australia.

4. Priority suppliers are those suppliers identified through a risk assessment tool as high or extreme perceived or confirmed inherent risk, including modern slavery related risks, and the SunRice Group has a high or extreme potential influence (leverage) (see page 10).

Our structure, operations and supply chain

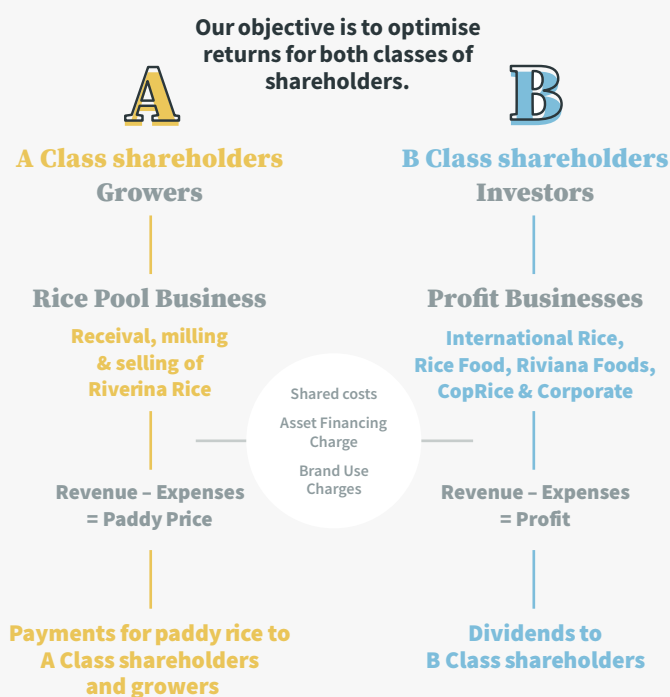
Our Structure

The SunRice Group is a global food group and one of Australia's leading branded food exporters. The SunRice Group was formed in 1950 when a group of rice growers pooled their resources in the Riverina region of New South Wales to build a single rice mill.

Today, listed on the Australian Securities Exchange (ASX) and grown into one of the largest rice food companies in the world, the SunRice Group now comprises multiple businesses, assets and operations across Australia, New Zealand, the Middle East, the United States, the Pacific Islands and Asia.

The Company's share structure defines the rights of our B Class Shareholders or investors, who have the right to receive dividends determined through our Profit Businesses; and our A Class Shareholders, who meet the production quotas prescribed by the Company's Constitution, and who are paid for their paddy through the Rice Pool Business and have control of the Company. While separate, the two business groups have mutually beneficial links and purposes. They complement each other, strengthening the alignment between our investors and growers. For more details of the non-standard elements of the Company's structure, please see pages 20–25 of our [FY2022 Annual Report](#).

Figure 1 – The Company's share structure



Phil Atkinson, Grower.

The SunRice Group’s products help to nourish families and support food service industries in ~50 countries around the world. With ~35 major brands, as well as leading positions in 14 countries, we continue to grow in key markets.

Our Brands & Products

In FY2022, we acquired Pryde’s EasiFeed, expanding our product offering and customer reach and further diversifying the Group’s portfolio and earnings. Our business segments, product mix and markets are directly aligned to our Growth Strategy.



RICE POOL BUSINESS

Australian Rice Pool

Supplying premium branded Australian rice, built on provenance and our heritage.

- #1 rice brand in Australian and New Zealand grocery
- #1 rice brand in Australian food service channels

PROFIT BUSINESSES

International Rice

A growing global supply chain and distribution network, delivering quality and sustainability.

- #1 or #2 medium grain rice brand in five Middle Eastern markets
- #1 rice brand across PNG and the Solomon Islands
- #1 rice brand across six other Pacific Island markets
- #1 rice brand in Hawaii, USA

Rice Food

Innovation in healthy snacking and food ingredients aligned to global food trends.

- #1 rice cakes brand in Australia and New Zealand
- #1 microwave rice brand in Australia

Riviana Foods

Brand-led gourmet food business building on “special occasions” and key consumer trends.

- #1 pickled vegetables brand in Australia
- #1 olives brand in Australia
- #1 pizza base brand in Australia
- #1 waffle brand in Australia

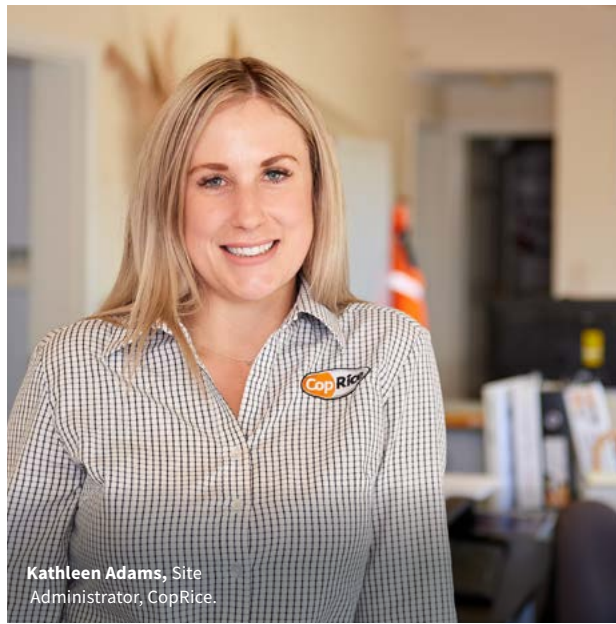
CopRice

Innovative animal nutrition that leverages the SunRice Group’s Riverina rice by-products.

- #1 equine sports lifestyle brand in Australia
- #1 equine breeding brand in Australia



Dominic Kelly, Southern Riverina Maintenance Manager.



Kathleen Adams, Site Administrator, CopRice.



Mark Groat, Field Extension / Agronomy Officer

Diversified portfolio of complementary businesses, with operations in **10 countries**

1,500+ products from gourmet and free-from consumer foods to food service and animal nutrition

~35 major brands in ~50 global markets, with leading brand positions in **14 countries**

2,000+ global workforce with 42% of Senior Management roles held by women

450 A Class grower shareholders and 3,424 B Class investor shareholders via a complementary capital structure

11 countries in our multi-origin, multi-price point rice sourcing supply chain

9 key stakeholder groups that we seek to create value for and engage with on **12 material topics**

6 sustainability priorities and ambitions aligned with how we create value for our stakeholders

Our operations

The SunRice Group has a diversified portfolio of complementary businesses both in Australia and internationally, including the United States, Singapore, the United Arab Emirates, New Zealand, the Solomon Islands, Japan, Jordan, Vietnam and Papua New Guinea (PNG). The SunRice Group's portfolio, which includes more than 1,500 products from gourmet and free-from consumer foods to food service and animal nutrition, helps to nourish families and support food service industries in approximately 50 global markets.

In addition to our core business in rice food products, the SunRice Group continues to grow in key markets and expand into new product categories through mergers and acquisitions⁵; particularly across the CopRice and Riviana Foods segments. Further penetrating high value segments, Pryde's specialist branded equine feed manufacturer EasiFeed was acquired by CopRice in FY2022, diversifying the SunRice Group's product offering, customer reach and portfolio earnings.

Our global workforce of over 2,000 people spans across our businesses and geographies. 73% of our employees are male and 27% female, with the majority of these employees based in Australia and PNG. 93% of our global workforce is employed on permanent full-time or part-time contracts, with 3% on temporary fixed-term contracts and 4% under casual arrangements. A detailed breakdown of our workforce can be found in our [Sustainability Snapshot \(page 41\)](#).

We also engage labour hire firms to provide us with the service of contracted workers in Australia, Vietnam and the United States. In FY2022, our reliance on labour hire increased due to continued labour shortages resulting from the COVID-19 pandemic.

Where appropriate, our operations are supported by the SunRice Group's centralised and localised sales and marketing, finance, procurement, people and culture, safety and sustainability activities.

5. See the SunRice Group 2022 Annual Report for details.

Our supply chain

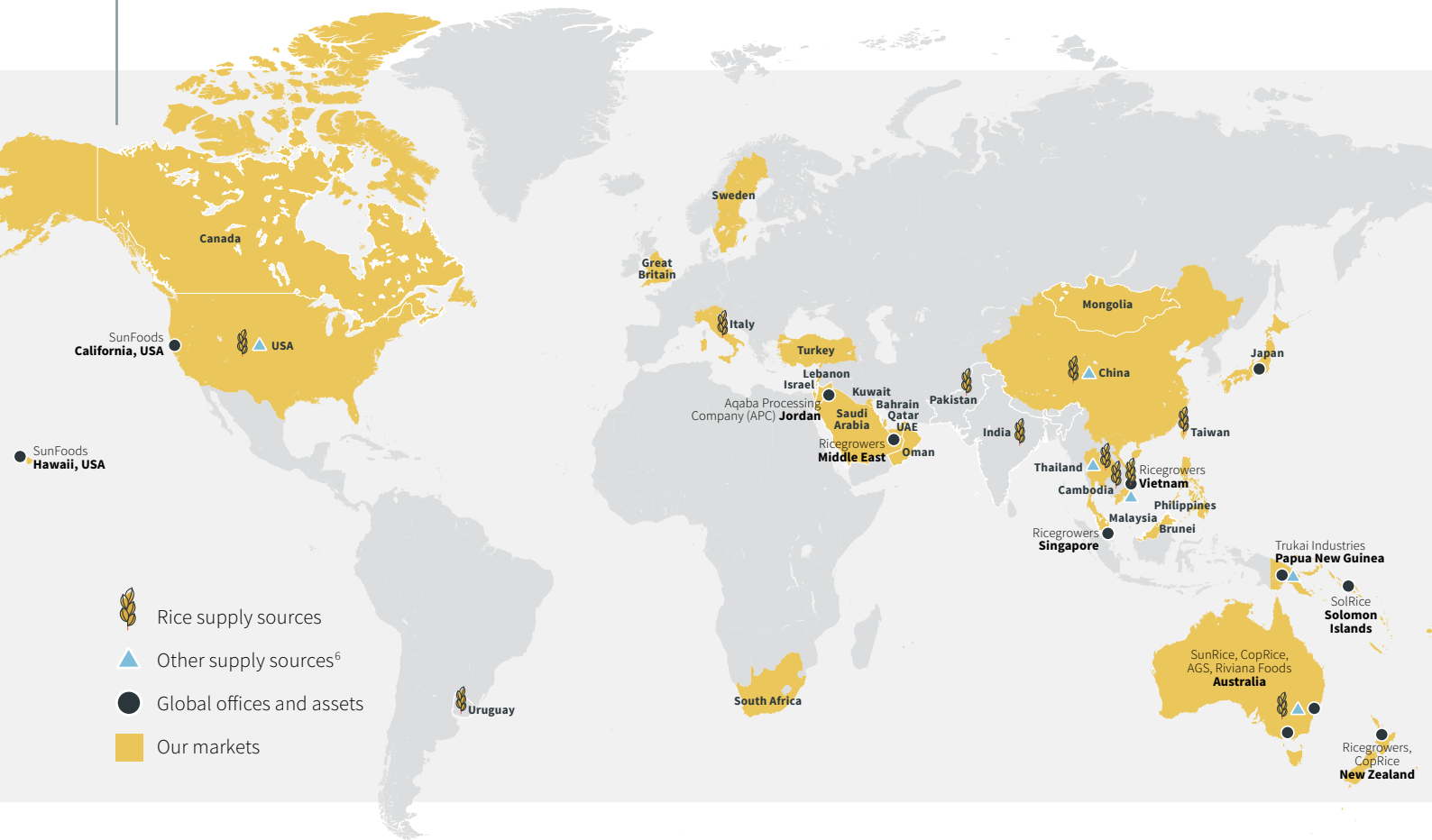
Rice is the most significant product we source and, having grown demand for rice products to in excess of 1.1 million paddy tonnes per year through years of market specific sales and marketing strategies, we are proud to have developed a sustainable, multi-varietal and resilient global supply chain with Australian growers at its centre. Building on our strong roots in Australia's key Riverina rice growing region in New South Wales (NSW), we have been growing our supply chain globally and, in FY2022, we sourced rice from our network of 11 countries and regions.

In addition to rice, other key products and services procured include food ingredients and products, packaging, manufacturing and logistics services.

As set out in the 'Our operations' section above, we undertook a number of acquisitions during the reporting period. Suppliers associated with newly acquired business are incorporated into our Supplier Sustainability Program, and therefore become subject to the same expectations in respect to labour rights and modern slavery as other parts of the SunRice Group. As the integration of these businesses continues, this remains one of the key focus areas for the SSP.

Our Growth Strategy is designed to cement the SunRice Group's position as one of the world's largest rice food companies, and as a truly global, multi-origin, multi-market food business. We continue to diversify our sourcing origins and cultivate strong relationships with our suppliers across the world.

SunRice Group Global Operations



6. Countries with >5% of the SunRice Group's total spend.

Actions taken to assess and address modern slavery risks

FY2022 Key Achievements

- ✔ Consolidation and review of global supplier inventory
- ✔ Refresh of supplier risk assessment
- ✔ Identification of priority suppliers for further engagement

Identifying modern slavery risks

Supplier risk assessment

During the year, the SunRice Group has undertaken work to consolidate its global inventory of supplier information. This Group-wide exercise enabled the SunRice Group to review its supplier data management system and maintain data consistency across different business units. The engagement also served as a training opportunity that deepened the awareness of our supplier risk assessment process with key stakeholders, including the regular cadence by which it occurs. At the end of FY2022, we updated our supplier risk assessment through ELEVATE's EiQ system, a supply chain intelligence platform. The results of the risk assessment will be reported in our next Modern Slavery Statement, and be used to inform our program strategy for the next year.

Our risk assessment methodology categorises our suppliers into four segments based on two dimensions:

1. Risk: the inherent risk of the supplier, including modern slavery related risks.

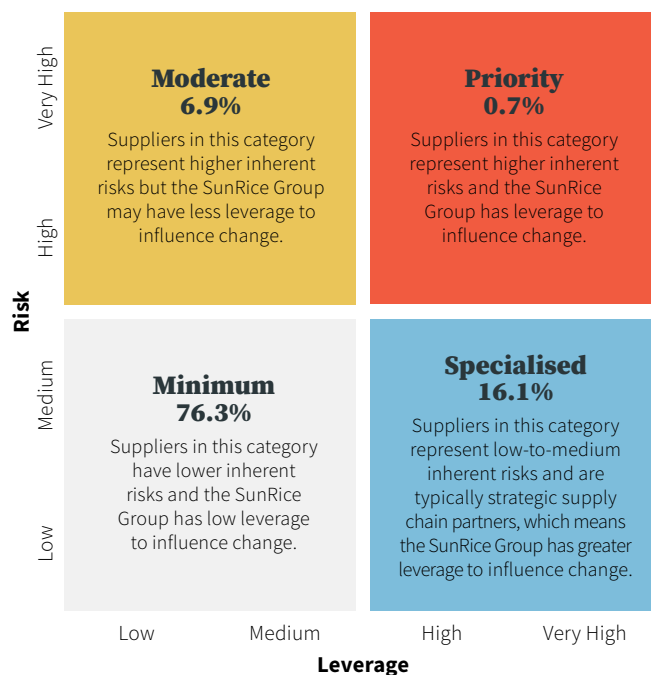
Through ELEVATE's EiQ platform, we assess inherent supply chain risks based on the location of our suppliers and the types of products and services provided. This process captures both the socio-economic conditions and regulatory context of the country, as well as the workforce characteristics and business process associated with the products/services sourced.

2. Leverage: the degree of potential influence the SunRice Group has with our partners.

Our business leverages insights to consider key factors such as the nature and length of our business relationship, and changes in spend and business volume over time.

Segmentation outcome for our suppliers

This risk assessment and segmentation exercise enables us to identify the suppliers where we have greater opportunities to influence change and ultimately prioritise our efforts where we can make the greatest impact. This is a tool that helps us understand our supply chain and prioritise our program, but it does not operate in isolation. We are committed to developing strong communication lines and educating our people so that if a supplier exhibits a risk indicator, they can be reviewed even if they do not fall within the priority leverage areas. These percentages will fluctuate as our supply chain evolves.



Note: Percentage refers to number of suppliers per segment.



Key potential Modern Slavery risks

We take a risk-based approach to managing the modern slavery risks in our supply chain and operations. We keep in mind the worker groups who are the most vulnerable to human rights abuses when assessing the impact of decisions on our business and supply chain. These groups include children, women, migrant workers, contract and seasonal workers (including agricultural workers) and marginalised groups such as people with disabilities, ethnic minorities, or other groups who are vulnerable to discriminatory laws and treatment. When assessing risk through ELEVATE's EiQ system, we focused on geographies, industries, products and services which are of higher risk of modern slavery and forced labour.

The following sections detail key focus areas of higher risk exposure, similar to what we have identified in the previous year. We will continue to report on our efforts to understand and mitigate these risks.

Our operations

Temporary labour and casual labour

Our risk assessment process highlights higher risks of modern slavery and forced labour related to the employment of casual and seasonal workers, migrant workers, and those in service-related roles (e.g., who provide cleaning, logistics or security services). These risks apply to both our supply chain, and to certain areas of our own operations, including our co-manufacturing facilities.

Casual and temporary workers tend to have fewer employment protections as compared with those in full-time positions, including working time protections, sick pay and protection against unfair dismissal. This can result from their types of contracts, and the higher risk of exploitation by a labour agency, particularly if they are migrant workers.

Processing, manufacturing and packaging

The use of casual or temporary workers in any storage, processing, manufacturing or packaging facility creates an inherent risk of modern slavery. The SunRice Group's facilities are located in Australia, New Zealand, PNG, Solomon Islands, United States, Vietnam and Jordan.

Australia has a strong labour rights regulatory framework and related enforcement, which is supported by internal SunRice Group policies⁷ and practices. However, with challenges in the supply of labour affecting all industries and countries including Australia, and with the increased use of labour hire in these operations, we acknowledge that the risks have increased since last year.

Over FY2022, Australia has experienced a labour shortage that has been exacerbated by border closures due to COVID-19. As such, the availability of local labour has been significantly impacted, resulting in an increased reliance on labour hire than in previous years. In response to this, the SunRice Group undertook an in-depth review and tightened due diligence checks on our labour hire providers globally. In line with our philosophy of partnership for shared learning, we met with our labour hire providers to understand how they were ensuring that the rights of their employees were protected on our sites and beyond. The SunRice Group will continue to use labour hire, particularly where we have seasonal work, and therefore it is important to us to continue to engage closely with our labour hire providers in FY2023 and beyond.

In other countries in which we have operations, including PNG, Solomon Islands and Vietnam, there are higher inherent risks of modern slavery. We seek to mitigate this risk by requiring all our operations and subsidiaries in all jurisdictions to operate in alignment with our Code of Conduct, Labour Rights Standard Policy, and other policies,⁷ which set out clear expectations around the protection of labour rights. We are continuing to map these risks as they relate to our own operations, and will regularly review our due diligence approach and suppliers' responses.

7. For more details on our policies, please refer to the Governance, policies and training section of this statement.



Our supply chain

Agricultural production

Agricultural products are generally associated with higher modern slavery risks. This is mainly due to the nature of the work involved, which is often labour intensive and highly seasonal leading to the use of temporary and casual labour. According to the International Labour Organization (ILO), agriculture is ranked to have the fourth highest number of confirmed forced labour cases out of all industries.⁸

There are also risks of child labour in the agriculture sector of many countries, including ones from which the SunRice Group procures supplies. As an agricultural and food company, we are exposed to higher risks in our supply chain of food ingredients and products. We are actively managing these risks through our due diligence program and monitoring and verification activities.

Rice

Rice is considered a high-risk commodity globally, due to its association with incidences of child and forced labour in multiple countries of production. Our rice is sourced from 11 countries and regions worldwide, including Australia.

The SunRice Group has traditionally sourced a significant amount of rice from Australia’s Riverina rice-growing area. Most of our Australian rice is grown on broad acre properties, where there is a high degree of mechanisation in the planting and harvesting processes and thus limited demand for manual labour. Due to the strategic importance of Australian rice to our history and brand identity, we will continue to partner with and review our Australian rice grower’s labour practices to provide even greater transparency.

Outside of Australia, we have identified rice suppliers located in countries with high risks of modern slavery through our risk assessment process. These suppliers fall within the scope of our SSP program and have engaged with us or are continuing to engage with us regarding their practices.

Countries/regions where the SunRice Group sources rice from (alphabetical order)

Higher risk ⁹ of modern slavery	Lower risk of modern slavery
Cambodia	Australia
China	Italy
India	United States
Pakistan	Uruguay
Taiwan	
Thailand	
Vietnam	

Shipping and Marine Transport

The global shipping and marine transport industry is associated with risks of modern slavery, with the nature of the work meaning that workers are more likely to face hazardous, isolated working conditions. These risks have been exacerbated as a result of the COVID-19 pandemic, with seafarers serving longer terms at sea, facing issues with repatriation, and the living conditions onboard vessels worsening. We reached out to our priority shipping suppliers using Self-Assessment Questionnaires in FY2021 to evaluate their policies and practices regarding modern slavery risks and continued to actively engage with them in FY2022.

8. International Labour Organisation – Global Estimates of Modern Slavery: Forced Labour and Forced Marriage (2017). From KnowTheChain 2018 Food and Beverage Benchmarking Report.

9. Based on EiQ risk assessment, including the use of globally recognised indices.

Governance, policies and training



FY2022 Key Achievements

- ✔ Determination of escalation procedure for modern slavery risks
- ✔ Targeted training for employees on human rights risks
- ✔ Targeted training for employees that have responsibilities relating to modern slavery risk mitigation
- ✔ Appointment of Sustainability Manager - Human Rights & Ethical Sourcing to oversee program
- ✔ Refreshed Enterprise Bargaining Agreement covering operations in the Riverina, showcasing alignment with the ETI Base Code's 'Freedom of association and the right to collective bargaining are respected'

Wendy Karipal, Management Accountant, Trukai.

As our SSP grows and evolves, we have focused on strengthening our governance procedures including through standardising procedures across our own operations.

Governance

Ultimate responsibility and accountability for the SunRice Group’s sustainability performance lies with the Company’s Board. Oversight of sustainability issues for our own operations and the SSP is under the remit of the Board’s Safety, Health and Sustainability (SHS) Committee. Updates on sustainability performance are shared with the SHS Committee on a quarterly basis.

The SSP Working Group is a cross-functional senior management group, established in FY2020 to ensure engagement and collaboration across the entirety of our business. It oversees identification and decision-making for modern slavery risks relating to our supply chain, including advising on supplier issues as they arise, and identifying any issues which should be escalated to the SHS Committee or the SunRice Group Board. The Working Group meets every 6–8 weeks, or more frequently if required and is supported by the Sustainability Manager – Human Rights & Ethical Sourcing.

The SSP Working Group during the reporting period comprised of:

- Company Secretary / General Counsel
- General Manager People & Culture
- Head of Operation Projects
- Head of Group Finance having responsibilities for Risk Management
- Head of Sustainability

Recognising the importance of a robust program to manage our response to modern slavery risks and the program overall, we enhanced our program and team by hiring a dedicated resource for the implementation of our human rights and ethical sourcing activities. The Sustainability Manager, Human Rights and Ethical Sourcing is responsible for day-to-day implementation of the program, escalating issues as required, and defining strategy in the SSP Working Group.

Engagement with employees increases awareness of the SunRice Group’s commitments on modern slavery. In order to support our various markets and Business Units, we tailor our engagement process with consideration of the local context and the nature of the work being done. In 2022, site tours included discussions on human rights expectations and high-risk areas within our operations and we engaged with People & Culture (P&C) teams around labour hire across the group and continued to provide training for our employees.

Governance of Modern Slavery Risks at the SunRice Group



Case Study

Human rights is becoming embedded in key commercial decisions made at the most senior levels of the business, including mergers and acquisitions and sourcing changes. For example, information on the human rights risks, and the approach that would be required to manage those risks in alignment with best practice principles, is presented to the Ricegrowers Singapore Board prior to deciding on procuring from a new rice sourcing country. Similarly, prior to acquiring a new business, the SunRice Group considers the impact on meeting our ambition of equity and equality across our supply chain.

Policies

We have several policies in place applicable across our operations and supply chain, that are relevant to modern slavery and are endorsed by senior management. These policies are aligned with our commitment to internationally recognised human rights standards, as well as industry collaborative codes such as the Ethical Trading Initiative (ETI) Base Code. Policies are communicated to employees through the SunRice Group intranet, email, training modules and other forms of multi-media (such as videos). No changes to our policies were made during the reporting period.

The relevant policies below are in most instances endorsed by the SunRice Group Board and available publicly on our [investor relations website](#).



Sustainability Charter

Defines our commitment to upholding fundamental human rights and mitigating the risk of all forms of forced labour and modern slavery across our operations and supply chain.



SunRice Group Code of Conduct

Defines our standards, values, and behaviours for how we operate as a business, including our commitment to the UN Guiding Principles on Business and Human Rights.



SunRice Group Speak Up Policy

Governs our whistle blower and grievance mechanism and processes, and clearly defines our investigation and escalation processes.



Supplier Sustainability Code

Outlines our standards and business practice expectations for suppliers to align themselves with, and includes provisions on preventing forced labour practices and exploitation within our supply chain.



SunRice Group Labour Rights Standards Policy

Outlines our adherence and commitment to the ILO Core Conventions, including the Forced Labour Convention, 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105). Specific focus is placed on freedom of association, forced labour and human trafficking, child labour, working hours, wages and benefits, servitude, diversity and inclusion.



Anti-Bribery and Corruption Policy

Demonstrates the SunRice Group's position in relation to zero tolerance for any form of bribery or corruption.

Key principles of ETI Base Code

ETI Base Code

www.ethicaltrade.org

SunRice is a proud to be an ETI Base Code Employer

Respect for workers worldwide

Employment is freely chosen

Freedom of association and the right to collective bargaining are respected

Working conditions are safe and hygienic

Child labour shall not be used

Living wages are paid

Working hours are not excessive

No discrimination is practised

Regular employment is provided

No harsh or inhumane treatment is allowed

Speak Up Policy

Speak Up!

Bribery or corruption

Forced to work

Underpaid

Underage workers

Bullying or abuse

Unsafe work environment

Encounter any of the above?
If so, speak up.

To report a concern to SunRice directly:

Email: ABCReporting@sunrice.com.au

Post: PO Box 2166 QNS, Post Shop, WDR 2126, Australia

Call: +61 2 9368 2074

To report a concern to our independent Speak Up hotline:

Online: speakup.ethicaltrade.org

Australia: 1800 553 747

US: 833 281 0346

Singapore: 800 823 2076

PNG: 900 861 271

Vietnam: [Number]

Scan QR code to make a report:

Speak Up is a service managed by an independent third party. It provides an avenue for SunRice employees and suppliers and their workers to report issues confidentially and anonymously.

Dial the direct access number for your location: 1 201 0288 or 1 228 0288. Then, dial 833-5482-0346 and follow the prompt.



Daniel Preston, Production Manager – Value Add,
Olivia Leal-Walker, Sustainability Manager – Human Rights & Ethical Sourcing.

“The growing conversation around ethical sourcing in our business means that our people – myself included – feel more comfortable to raise questions about our processes. As a result, we’ve worked together to redesign how we engage with our labour hire providers. Partnership between People & Culture, Legal and Sustainability has been key.”

Jacqueline Bryant
Human Resources & Safety Manager, SunFoods

Training

Training our team and equipping them with the resources and tools to proactively identify modern slavery risks and participate in risk mitigation and remediation is critical for the success of our SSP. The training ensures that employees are aware of the SunRice Group’s expectations, how this relates to their roles and responsibilities, and ensures that our commitment is embedded across the business.

Our employees continued to receive training through eLearning on Respectful Workplace behaviours (274 trained), Our Approach to Sustainability: Recognising the risks of Modern Slavery (160 trained), and the Supplier Sustainability Code (13 trained as specific to role). As the courses are valid for two years and due to the high completion rate last year, the number of participants is comparatively lower to FY2021. These training modules are part of the SunRice Group’s broader governance framework and cover the SunRice Group’s policies and expectations relating to equal employment, preventing bullying, harassment and discrimination, recognising indicators of modern slavery, and the requirements of the Australian Modern Slavery Act. The Company’s Board has continued to participate in governance training through eLearning and face to face training throughout the year. This training framework incorporates topics such as Whistleblowing, ESG, Modern Slavery and Work Health and Safety.

While formal training has been effective, this year we have engaged successfully through targeted face to face training of our business teams via our dedicated Human Rights manager and/or P&C business partners. For example, training on the use of labour hire – including an overview of our commitments to human rights, the risks of labour hire (including in Australia), case studies, our

expectations of providers and the process for undertaking detailed due diligence – was implemented for our Global P&C and Legal teams, with additional engagement for Site Managers. Procurement and Quality team members were engaged on the development of the Supplier Decision Tree, gaining a deeper understanding of the risk points for human rights issues across our supply chain in the process, as well as the level of due diligence required based on these risks.

Industry engagement

The SunRice Group has been a participating member of the UN Global Compact Network Australia (UNGCNA) since 2018. Our Head of Sustainability is a member of the Modern Slavery Community of Practice (MSCOP). An industry group of UNGCNA signatory organisations, the MSCOP meets regularly to discuss best practice and industry challenges in the sector.



Due diligence, action and remediation

FY2022 Key Achievements

- ✔ Ethical Trading Initiative (ETI) focused due diligence of operations, focusing on high-risk areas including labour hire, young workers, and working hours
- ✔ Undertook SMETA audits at all SunFoods facilities
- ✔ Became SEDEX Buyer/Supplier members to streamline reporting of human rights risks for suppliers
- ✔ Systematic review and formalisation of due diligence requirements for suppliers
- ✔ Investigation and escalation of any grievances raised as per the Group Speak Up Policy
- ✔ Outcomes actively communicated to affected stakeholders and used to refine operational processes



Rohan Caniglia,
AGS Site Coordinator, AGS.

Our operations

Improving and standardising our due diligence processes for our own operations has been a core focus for this year. Creating the framework and foundation for our own sites to deliver compliance with our policies and the ETI Base Code, is key to ensuring that the rights of our employees are respected.

We identified that the use of temporary labour and contracting agencies was a key risk area for our own operations and as a result, we undertook a detailed review. Areas for improvement and standardisation were noted through this mapping, and extensive engagement was conducted between group Sustainability, P&C and legal and compliance to identify the best strategies for improving our processes. As a result of this due diligence, a new process has been implemented in FY2022 for approval of labour hire agencies, including ongoing proactive screening of existing and potential suppliers using EiQ Sentinel, a tailored due diligence checklist and engaging openly with our providers about their practices. New processes have been implemented for ongoing engagement with labour hire agencies to encourage best practice. All revisions to

existing procedures have been conducted in alignment with ILO requirements and best practice industry standards.

Social compliance audits were completed in FY2022 for two of our own sites in the US, deploying SEDEX's SMETA audit protocol. The audits noted no major findings relating to modern slavery or inhumane treatment, noted employee satisfaction with the site and management and also that employees were well aware of the SunRice Group's policies and expectations, and how to raise grievances without fear of retaliation if required. Areas for improvement were noted relating to onsite safety inspections, which we have addressed in a timely manner and have implemented preventative action plans to ensure that they do not recur in the future. We continue to deploy an audit program for our own sites, with six facilities audited to date. We plan to continue to scale our assessments in the next fiscal year to meet our commitment for all the SunRice Group facilities to have completed an independent ethical audit by FY2024.

Case study

Labour hire is a known vulnerable group and it is important to the SunRice Group that workers' rights are protected and the risk of exploitation is minimised. As a result, all new and existing labour hire providers are automatically subject to more detailed due diligence, including screening on EiQ Sentinel for any negative news media or incidents, interviews to dive deeper into worker payment, sourcing and other practices and policies, and the provision of documentation. We continue to include labour hire in our ethical audit program for our own operations.





Our supply chain

During the year, we have formalised our supply chain due diligence process. Through multiple rounds of consultation with different business units, we have developed a process for onboarding new suppliers and setting out our due diligence expectations for our existing suppliers. This enables us to integrate social compliance and modern slavery expectations as part of our supplier selection process. By clearly demarcating checkpoints and accountabilities in the decision tree, this exercise also strengthens the overall governance of the SunRice Group’s SSP. We have developed contract clauses relating to labour conditions and human rights and acknowledgment of our Supplier Code of Conduct are included in our contracts and commercial terms and conditions with suppliers.

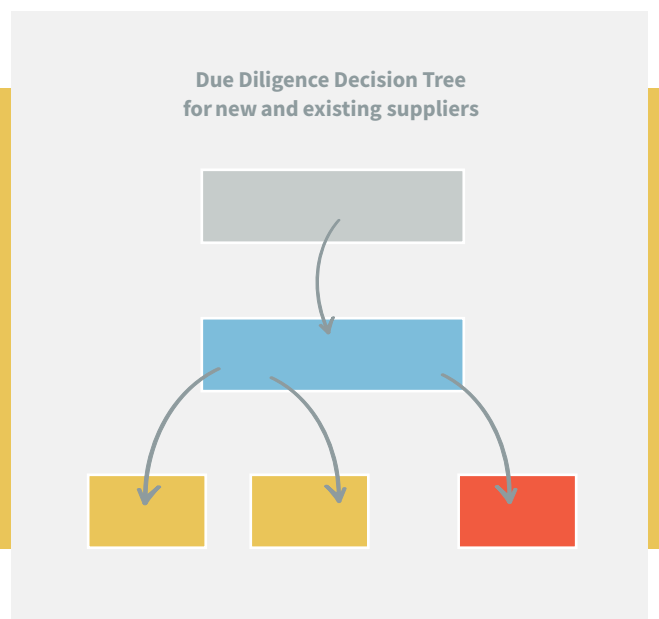
Our due diligence process systematically screens for high-risk suppliers. Once identified as high risk, prospective suppliers would need to provide additional information on their risk management practices through SAQs or audits. As such, the SunRice Group is able to have more visibility on supplier social compliance performance from the onset of its business relationship and work with suppliers to ensure appropriate safeguards are in place and aligned with our principles.

Decisions regarding supplier arrangements that remain high or extreme risk after detailed due diligence, and those suppliers that do not engage with us regarding their modern slavery practices, are escalated to our Corporate Management Team, SHS Committee and Board as required. This decision tree is being embedded into our procurement practices, ensuring that all new suppliers are assessed for their risk of human rights in accordance with the process at key points including procurement tenders, during the new product development process and when new vendors are approved.

The SunRice Group has consolidated its supplier due diligence tools through the SEDEX platform. This audit sharing platform allows the SunRice Group to access the SAQ and audit results of its suppliers. In the next year, the SunRice Group is rolling out a mutual recognition program, so that audit results across different audit schemes can be comparable and recognised as part of our SSP. This will maximise the efficiency of supplier monitoring and reduce audit fatigue on behalf of our suppliers.

Case study

This year, the SunRice Group has focused on developing a decision tree with the aim to formalise the integration of social compliance and modern slavery expectations as part of the supplier selection process. Given the use of labour, including temporary labour, in warehousing and logistics, it was essential that we implemented this decision tree during a recent tender. Understanding potential suppliers’ approach to identifying and managing human rights risks was a key component in assessing their capability.





FY2022 Key Achievements

- ✓ Ongoing training of employees regarding the Speak Up Program
- ✓ Review of all grievances raised

Access to remedy: Grievance mechanisms

The SunRice Group is committed to enabling effective remedy for all our stakeholders, including employees, suppliers and community members. The SunRice Group Speak Up Program, governed by our Group Speak Up Policy, allows our stakeholders to report issues confidentially and anonymously without fear of retaliation. Our program includes the availability of an external and independent reporting hotline available 24 hours a day globally.

We have a stringent investigation and escalation procedure for reviewing all reports and feedback received, including through our grievance channels. The results of the investigation may where appropriate be communicated with affected stakeholders, and we have developed a feedback loop to ensure that any appropriate procedural improvements are made based on the feedback that is received. As issues are raised, they are escalated to the SSP Working Group and our Group CEO. External third-party support is involved for guidance and remediation as required.

Our Speak Up Ambassadors who are assigned to our high-risk global facilities conduct regular Speak Up training and make themselves readily available to employees, to ensure that workers can feel comfortable disclosing to trusted internal representatives in addition to using our external Speak Up hotline. Our employees are made aware of the Speak Up mechanisms available to them so they know how to reach out for help.

Guidance materials such as posters for our grievance channels are displayed in our own facilities and shared with our suppliers for their use to ensure that our Speak Up the mechanisms are known and accessible by workers in our supply chain.

In addition to formal grievance channels, the SunRice Group employees are supported to speak with their Site Manager, P&C Business Partner or Sustainability Manager if they have any concerns.



Case study

Our employees in Vietnam were impacted by country-wide travel and movement restrictions resulting from COVID-19. The SunRice Group needed to ensure that the needs of our employees were being met under the challenging circumstances, and provided accommodation and additional support at our Vietnam Mill. Our grievance mechanisms, including having a Speak Up Ambassador on site, ensured that employees were able to raise any concerns they had and that these were resolved appropriately.

Assessing the effectiveness of our actions and future plans

Year 1 – FY2021

Enhance supply chain transparency and strengthen internal governance procedures

Year 2 – FY2022

Strengthen supplier monitoring and engagement, build supplier capacity, and align internal systems

Year 3 – FY2023

Continuous improvement on risk management and mitigation

Ensuring that our modern slavery and broader human rights program is driving impact is critical to us. Our systems are designed with feedback loops to drive continuous improvement and identify areas where our program activities need to be accelerated or revised. The SSP Working Group and the SHS Committee of the Board are responsible for reviewing the effectiveness of our program, measured against our short-term and long-term goals, and planned actions indicated below.

Aligned with our three-year road map, we focused on strengthening our supplier monitoring processes this year and aligning our internal systems to ensure efficiency and effectiveness, with a pivot to ensure we also strengthened practices within our own operations. Our plans for the next year focus on continuous improvement of our processes, and further roll-out of supplier monitoring activities.

Our long-term goals

- 100% of the SunRice Group owned sites with refreshed social and ethical audits
- Ensure robust governance systems for the SunRice Group's operations on human rights and modern slavery
- Minimise the risk of labour rights abuses in our operations and supply chain
- Build internal capability to identify and remediate issues as they arise,
- Foster open and trusted supplier relationships to identify and remediate labour rights issues across our supply chain

Our FY2023 goals

Our goals are important and keep us accountable and they will adapt and adjust throughout the year as our program evolves.

Key focus areas for the future and indicators to assess programme effectiveness

Focus area	Progress in FY2022	Planned Actions & Short-term Goals (FY2023)
Governance	<ul style="list-style-type: none"> • Annual modern slavery training for directors • Quarterly meetings with Board SHS committee, and progress included in monthly CMT updates • 4 meetings of the SSP Working Group • 325 employees completing modern slavery training and eLearning 	<ul style="list-style-type: none"> • Maintain Board review of activities • Conduct regular program reviews by the SSP Working Group to evaluate program results, and ensure continual improvement • Review and refresh modern slavery training program for employees and suppliers
Risk Assessment	<ul style="list-style-type: none"> • More than 5000 suppliers that are risk assessed by country and product/service 	<ul style="list-style-type: none"> • Review and refresh both our internal and supplier risk assessment processes to reflect changes in operating context and evolving risks
Program Monitoring	<ul style="list-style-type: none"> • 2 own sites audited • 26 supplier assessments occurred 	<ul style="list-style-type: none"> • Total of 7 SunRice Group sites with refreshed social and ethical audits • Supplier Mutual Recognition Program making it easier for suppliers to comply with our SSP
Remedy and Grievance	<ul style="list-style-type: none"> • Continued promotion and internal engagement on grievance process and how to seek remedy 	<ul style="list-style-type: none"> • Review Speak Up Policy and Program reports, investigations and responses to identify and address issues



Ganesh Kashyap,
General Manager, CopRice.

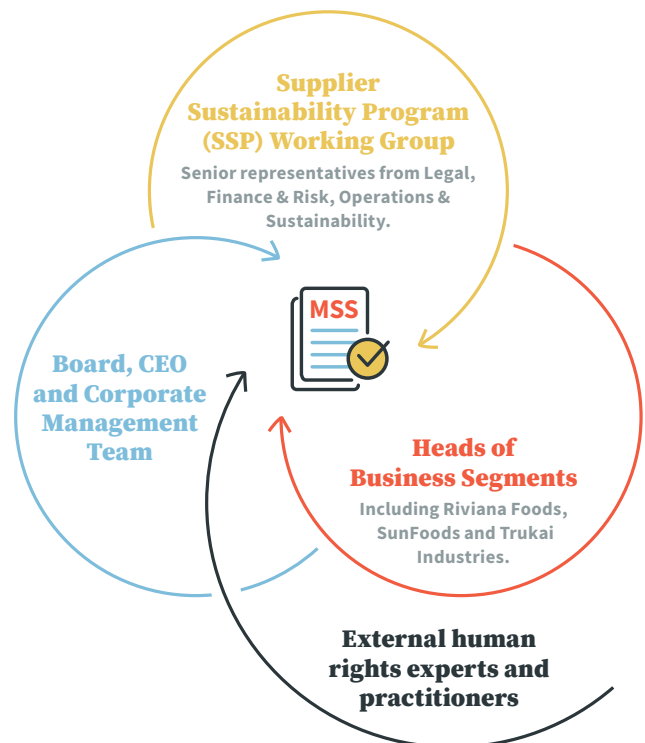
Consultation process

The ongoing development of our Modern Slavery Statement and the SSP on which it is based, includes a comprehensive consultation process with input from across all areas of our business.

We understand that actively engaging with our people, regardless of their roles, builds internal alignment and is a fundamental component in developing robust programs and procedures. By focusing on internal engagement through the SSP, we foster a culture of open communication, another essential element for a successful program.

All necessary consultation and engagement with the entities listed within the Introduction has occurred in relation to the detail within this Statement. In particular, the SunRice Group's management team with specific operational responsibility for Ricegrowers Limited, Riviana Foods Pty Ltd and all operational subsidiaries provided feedback and approved a draft of the Modern Slavery Statement prior to it being presented to the Board of Ricegrowers Limited for final review and approval. For more information on the mechanisms by which consultation occurs, see 'Governance' on page 14.

Modern Slavery Statement developed with broad consultation across the SunRice Group





Regulatory disclosure matrix

This statement was prepared to meet our regulatory disclosure requirements, and complements our existing sustainability disclosure found on the SunRice Group website and annual sustainability reports.

The table below references where the mandatory criteria are disclosed for the Australian *Modern Slavery Act 2018* (Cth).

Mandatory criteria	Disclosure reference
1 Criterion 1: Identify the reporting entity	<ul style="list-style-type: none"> • Introduction, page 3
2 Criterion 2: Describe the reporting entity's structure, operations and supply chains	<ul style="list-style-type: none"> • Our structure, operations & supply chain, page 5–8
3 Criterion 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	<ul style="list-style-type: none"> • Identifying our modern slavery risks, page 10–12 • Due diligence, action and remediation, page 17–20
4 Criterion 4: 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	<ul style="list-style-type: none"> • Governance, policies and training, page 13–16 • Due diligence, action and remediation, page 17–20
5 Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions	<ul style="list-style-type: none"> • Due diligence, action and remediation, page 17–20 • Assessing the effectiveness of our actions and future plans, page 21
6 Criterion 6: Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	<ul style="list-style-type: none"> • Consultation process, page 22



Modern Slavery Statement 2022

Ricegrowers Limited

57 Yanco Avenue
Leeton NSW 2705
Australia

Riviana Foods

Level 1 Office Tower One
1341 Dandenong Road
Chadstone VIC 3148
Australia

SunFoods

1620 E. Kentucky Avenue
Woodland California
USA

Contact

E suppliersustainability@sunrice.com.au

P +61 2 6953 0411

sunrice.com.au

sunrice.com.au/our-modern-slavery-statement/