

MODERN SLAVERY STATEMENT

December 2020

POLICY STATEMENT

In2food Australia Pty. Ltd. ABN 17 609 288 360, (“In2food”) opposes modern slavery in all forms. In2food is committed to the highest standards of conduct and ethical behaviour in our business activities and to promoting a culture of honest and ethical behaviour, corporate compliance, and good corporate governance. This statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth).

THE REPORTING ENTITY

In2food Australia is the parent company of IN2F services (49 618 857 471), Inspired Food Solutions (ABN 23 610 341 716), Middle Road Investments (ABN 46 622 029 752) and Yarra Valley Farms Pty. Ltd. (ACN 141 164 767). In2food is a reporting entity under the Act so is required to submit its first modern slavery statement in December 2020, and annually thereafter.

OUR OPERATIONS

In2food has operations in Western Australia, Northern Territory, Queensland, New South Wales, Victoria and South Australia. We operate in the Food Service Industry with supply of fresh produce, as well as Packaged Produce and manufactured Ready Prepared Meals.

While modern slavery clearly occurs within Australia, the realities of global trade and business make it inevitable that Australia, like many other countries globally, will also be exposed to the risk of modern slavery through the products it imports.

(<https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>)

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The term modern slavery is used to denote practises defined in the Modern Slavery Act 2018 (Cth) (MS Act) and includes eight types of serious exploitation: servitude, slavery, forced labour, forced marriage, the worst forms of child labour, debt bondage, deceptive recruiting for labour or services and trafficking.

OUR SUPPLY CHAIN

As a fresh food supplier, our supply chain consists approximately 95% from Australian farms with a small percentage supplied from overseas. The majority of our supply chain is from Australian growers either Farm direct or via the Fresh Food Wholesale Markets.

The companies acquired to create the entity In2food, were long established Australian businesses with strong local supplier relationships.

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In2food recognises that building strong relationships with our suppliers is an essential part of our broader commercial strategy and sees engaging on modern slavery risks and issues as an opportunity to enhance even further, our working relationship with our suppliers.

IDENTIFYING THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS

Cases of forced labour exploitation in Australia predominantly occur in industries considered at risk, including agriculture, construction, domestic work, meat processing, cleaning, hospitality, and food service (<https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>).

The global report: The 2018 List of Goods Produced by Child Labor or Forced Labor highlight that there is risk in the Food and Beverage industry (<https://respect.international/industry/food-beverage/>)

In the first tier of In2food's supply chain, In2food considers that the risk of modern slavery is relatively low. However, we acknowledge that there are areas of our supply chain that may pose higher risks of modern slavery, as identified in the two global reports above. We acknowledge that whilst we are particularly engaging with our suppliers, we will execute a supplier questionnaire on an annual basis to further assess and mitigate those risks.

The developing COVID-19 pandemic poses an increased risk of modern slavery across global supply chains and we acknowledge that it is likely to have increased the vulnerability of workers in our own supply chain in Australia, and globally. Throughout the 2021 reporting period, we will continue to gather, collate and take action where necessary based on information provided by our suppliers in our Supplier Questionnaire to identify risks of Modern Slavery.

In our ongoing engagement with our suppliers in the next reporting period, we will also seek to understand how they and their supply chains have been affected by COVID-19, and whether In2food has any capacity to help mitigate the enhanced risks where they exist.

ASSESS AND ADDRESS THE RISKS OF MODERN SLAVERY IN OUR OPERATIONS

This is In2food's first reporting period however, plans are underway to create a Steering Committee with key stakeholders in the next reporting period.

In2food participated in a Sedex Ethical Audit 2020 which looked at aspects of Migrant workers as it relates to Modern Slavery. During the audit process, it was identified that the recording of Migrant Workers was inconsistent. A complete audit of all migrant visa holders, with up to date VEVO checks was carried out. In2food have implemented internal controls, allowing the business to monitor and ensure compliance.

The business created its first draft of the following policies and published them on the business website: Modern Slavery, Anti-Bribery, Human Rights, Whistle blower and Ethical Sourcing Policies (<https://in2food.com.au/policies/>).

An Employee Handbook was created and provided to all employees containing all Company policies.

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SUPPLIER CONSULTATION PROCESS

In2food is still in the development phase, and in the next reporting period aim to engage with all of our suppliers as part of our due diligence in assessing and addressing the risks of Modern Slavery, as well as engaging with all new suppliers as we bring them on.

ADDRESSING RISK

In2food's commitment to addressing risks of modern slavery is Companywide and is being ingrained in our policies and procedures. Our policies and procedures have been reviewed to address the risk of modern slavery in our supply chains and operations and the amendments will be implemented in the next reporting period.

We have developed our first version of an Ethical Sourcing Policy, which outlines our commitments to sourcing products and services responsibly, ethically and sustainably.

In2food's Whistle Blower Policy sets out a process to raise concerns about improper conduct. Under the Whistle Blower Policy persons are required to report failures of persons to comply with legal or regulatory obligations (such as Modern Slavery, OH&S and Human Rights Law).

In the next reporting period, we commit to drafting our Supplier Minimum Standards document, which will cover upholding labour and other human rights, respect in the workplace, occupational health and safety and environmental protection.

The Company plans to engage with all suppliers requiring them to meet minimum standards related to prevention of modern slavery and ongoing due diligence in the suppliers supply chains. For some of our smaller farm direct suppliers, this will be new for them. We commit to working with them and helping where possible with compliance and potential risks in their supply chain.

We have appointed a National Tender Manager for 2021, and part of the responsibility for this new position is to see that discussions and consultations addressing the risk of Modern Slavery are included in the tender process.

OUR CAPACITY BUILDING

We have plans to deliver training to the National Leadership Team and other key roles on the nature and risks of modern slavery and the work that is required by In2food in order to ensure we are adequately addressing these risks. It will cover our: Modern Slavery, Human Rights and Anti-Bribery policies and procedures plus supply chain due diligence. The business has a commitment to investigate an all employee roll out.

In2food is committed to ensuring the actions we are taking to identify and mitigate the risks of modern slavery are effective. An analysis of the training above to the National Leadership Team will be conducted to evaluate its effectiveness and adjusted as required.

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NEXT REPORTING PERIOD

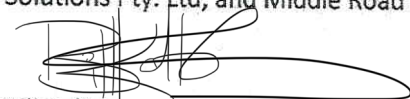
In2food is committed to identifying and eradicating risks of modern slavery from our supply chain. In the 2021 reporting period, we will consolidate a formal Steering Committee to collaborate and evaluate our supply chain risk, policies and procedures. This team will also work together on drafting our Supplier Questionnaire, and Risk Assessment Framework in our ongoing commitment to identify risks of Modern Slavery.

WANT TO KNOW MORE?

For more information on the Modern Slavery Act 2018 (Cth), please visit the [Department of Home Affairs](#).

For more information on In2food's Modern Slavery Framework or supply chain contact people@in2food.com.au

In2food Australia Pty. Ltd. is a private company. This statement was approved by the principle governing body: Chief Executive Officer/Managing Director Bill Kollatos, Managing Director Richard Cooper and Managing Director Steven Kilfoil for the five reporting entities covered by this statement: In2food Pty. Ltd, IN2F Services Pty. Ltd., Yarra Valley Farms Pty. Ltd., Inspired Food Solutions Pty. Ltd, and Middle Road Investments Pty. Ltd. on December 29th, 2021.



Bill Kollatos
Chief Executive Officer/ Managing Director In2food Australia Pty. Ltd.
December 29th, 2021.



Richard Cooper
Managing Director In2food Australia Pty. Ltd.
December 29th, 2021.



Steven Kilfoil
Managing Director In2food Australia Pty. Ltd.
December 29th, 2021.