



# Modern Slavery Statement 2023



## Acknowledgement of Country

*The SunRice Group acknowledges the Traditional Owners and Custodians of the lands on which we live, work and operate. We pay our respects to Elders past and present and acknowledge their continuing connection to land, waters and community.*

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## About this Statement

This Modern Slavery Statement (**Statement**) is made in accordance with the Australian *Modern Slavery Act 2018 (Act)* and also meets the disclosure requirements of the *UK Modern Slavery Act (2015)* and the *California Transparency in Supply Chain Act (2010)*. This is our fourth Statement. This is a joint Statement made under section 14 of the Act, for Ricegrowers Limited (**SunRice**) ABN 55 007 481 156 and Riviana Foods Pty Ltd (**Riviana Foods**) ABN 97 061 388 092, which we have determined are reporting entities under the Act. This Statement describes the actions taken by the reporting entities and their owned and controlled entities (together, **SunRice Group**), to assess and address modern slavery risks in our operations and supply chains for the reporting period 1 May 2022 to 30 April 2023 which is our financial year (**FY2023**).

Unless expressly stated otherwise, references in this Statement to the 'SunRice Group' and 'Group' refer to Ricegrowers Limited, Riviana Foods Pty Limited and the other owned or controlled entities of Ricegrowers Limited. Their operations and supply chains form part of the operations and supply chain of the reporting entities.<sup>1</sup> All policies, processes and activities discussed in this Statement are applicable to the SunRice Group. We are working towards consistently implementing them across the Group. A full list of our owned and controlled entities is provided at Appendix 2.

This Statement was approved on 27 October 2023 by the Ricegrowers Limited Board and signed by Paul Serra, SunRice Group CEO and Managing Director (appointed at the Annual General Meeting in August 2023) and Laurie Arthur, Chair of the Board.

1. Refer to the Financial Report in our 2023 Annual Report for a description of our operating segments and businesses and for a full list of the SunRice Group's owned and controlled entities that are not reporting entities under the Act. SunRice Group entities are also listed in Appendix 2 of this Statement.



## SunRice Group Speak Up

At the SunRice Group, we are committed to ensuring our people, community members impacted by our activities, our customers and those in our supply chain have access to an effective grievance mechanism. If you have concerns about human rights issues including modern slavery in our operations or supply chain, it's important to speak up. You can make a report via the channels set out below.

All reports will be treated confidentially. If you would like to make an anonymous report use the Speak Up hotline.

### To report a concern to the SunRice Group directly:

**Email:** ABCreporting@sunrice.com.au  
**Post:** PO Box Q166 QVB  
Post Shop, NSW 1230 Australia  
**Call:** +61 2 9268 2074 (Australia)

### To report a concern to the SunRice Group's independent Speak Up hotline (toll free):

**Online:** sunrice.ethicspoint.com  
**Call:** 1800 953 947 (Australia)  
800 852 3976 (Singapore)  
833 581 0346 (USA)  
000 861 271 (PNG)

If calling from Vietnam:

Step 1: Dial the direct access number for your location:  
1 201 0288 or 1 228 0288.

Step 2: At the English prompt dial: 833 581 0346.

Scan QR code  
to make a report



# Chair and Group CEO message



Laurie Arthur, Chair



Paul Serra, Group CEO and Managing Director

At the SunRice Group, our purpose is to make a difference to places and lives everywhere through nourishing and delicious products. With roots in Australia's food bowl, we seek to transform nature's goodness into healthy, enjoyable and nutritious foods that meet the needs of consumers around the world. Our purpose and vision is focused on bringing sustenance to tables worldwide, this is underpinned by our commitment to securing a reliable and adaptive global supply chain.

Respect for human rights is one of the six priorities in our approach to sustainability. This includes respect for the fundamental rights of our people, of all people who have a connection with our business and to implementing practices that support the minimisation of exploitative practices. We are pleased to present our fourth annual Modern Slavery Statement. This year's Statement is a reflection of our ongoing efforts to address modern slavery risks in our operations and supply chain.

As a company founded in the Riverina region of New South Wales (NSW), we have an ongoing and important relationship with the Australian agricultural sector, particularly rice growers. One of our areas of focus during the year was engaging with growers through our Australian Grower Social Review which enabled us to develop a clear understanding of potential modern slavery and other labour risks associated with rice production in Australia.

We would like to thank the growers who were involved in this project. We are now supporting the Ricegrowers' Association of Australia (RGA) to develop tools and other training and education initiatives to support growers in improving their practices.

As a business, we continue to face several challenges that may have implications for our modern slavery risk profile and approach, including ongoing labour shortages, extreme weather impacts, geopolitical risks and inflationary pressures. However, we are confident in our ability to continue to respond to these challenges, monitor how they may create or exacerbate modern slavery related risks and engage with stakeholders to improve our approach.

While we have taken important steps over the last year, our approach is still evolving. As new challenges and opportunities emerge, our objective is to continue adapting our approach across our global operations and supply chain. Key to our response will be collaboration with our suppliers, communities and the rice industry, and we look forward to strengthening our role in this area.

Laurie Arthur  
Chair

Paul Serra  
Group CEO and  
Managing Director

27 October 2023



# Introduction

From our beginnings in 1950 when a group of rice growers pooled their resources in the Riverina region of NSW to build a mill and create Ricegrowers' Co-operative Limited, the SunRice Group is now a global food business and one of Australia's leading branded food exporters. The Group also includes a vibrant and growing animal nutrition business, CopRice, as well as Riviana Foods, a brand-led gourmet food business and one of Australia's leading food importers. Since our earliest days, we have understood that our success depends on sustaining the health of both the farms that we source products from and the communities in which we operate in.

At the core of our purpose to make a difference is our commitment to sustainability. We are committed to respecting the fundamental human rights of our people, customers, consumers, communities and workers in our supply chains. Our commitment is guided by internationally recognised human rights in the Universal Declaration of Human Rights and the core Conventions of the International Labour Organization (ILO) including freedom from slavery. We are also working to implement the United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs).

As a participant in the UN Global Compact (UNGC), the SunRice Group is guided by the initiative's Ten Principles including its human rights and labour principles.<sup>2</sup> We also continue to evolve the role we can play in making a meaningful contribution to the UN Sustainable Development Goals (SDGs).

This contribution includes Target 8.7 which aims to eradicate forced labour, end modern slavery and human trafficking and eliminate child labour in all its forms and Target 8.8 which is focused on protecting labour rights and promoting a safe and secure working environment for all workers, including migrant workers.<sup>3</sup>

**Modern slavery is an umbrella term referring to situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, deception and/or abuse of power.<sup>4</sup> The term refers to a range of serious human rights violations, which are also crimes in Australia, including all forms of human trafficking, forced labour, debt bondage, the worst forms of child labour and other slavery-like practices.<sup>5</sup>**

At the SunRice Group, our values drive how we do business, make decisions and partner with those in our supply chain. These values underpin our sustainability and human rights risk management approach. Our commitments to act with *Integrity*, contribute to our *Community* and be *Dynamic*, *Innovative* and *Collaborative* are reflected in our Sustainability Framework.



Paul Waterhouse, SunRice Group Electrician and Sunilkumar Prajapati, Apprentice Electrician.

## Evolving modern slavery landscape

The issue of modern slavery is complex and constantly evolving. New forms of exploitation and areas of risk emerge over time, as do expectations pertaining to good practices and legal frameworks. At the SunRice Group, we monitor the domestic and international landscape to position us to respond to these evolving challenges and opportunities.

The 2023 Global Slavery Index (GSI)<sup>6</sup> has highlighted that despite society's collective efforts, there has been an increase in the number of people living in modern slavery. According to the GSI, 50 million people globally are living in modern slavery (up from 40.3 million in 2018), including 41,000 in Australia.<sup>6</sup> These figures reinforce our aim to reduce our involvement in modern slavery risks in our operations and supply chains and highlight the importance of continuing to improve collaboration and engagement with a range of stakeholders.

In relation to the Australian and global policy and legislative landscape, we have followed several developments this year including the Australian Government-commissioned independent review of the Act, developments in New Zealand in relation to the introduction of modern slavery legislation, Germany's *Corporate Due Diligence Obligations in Supply Chains Act*, the EU's proposed *Corporate Sustainability Due Diligence Directive* and updates to the *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*. Monitoring these developments helps inform our modern slavery risk management approach and supports our ability to respond to emerging areas of risk, integrate leading practice and quickly adapt to changes in legislative requirements.

2. The Ten Principles include Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights, Principle 2: Businesses should make sure they are not complicit in human rights abuses, Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour, Principle 5: Businesses should uphold the effective abolition of child labour. Available at: <https://unglobalcompact.org/what-is-gc/mission/principles>.

3. SDG Target 8.7 "Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers and by 2025 end child labour in all its forms." SDG Target 8.8 "Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants and those in precarious employment." Available at: Goal 8 | Department of Economic and Social Affairs (un.org).

4. Walk Free. What is Modern Slavery? Available at: <https://www.walkfree.org/what-is-modern-slavery/>.

5. Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. Available at: [https://modernslaveryregister.gov.au/resources/Commonwealth\\_Modern\\_Slavery\\_Act\\_Guidance\\_for\\_Reporting\\_Entities.pdf](https://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf).

6. Walk Free. The Global Slavery Index 2023. (published in May 2023, outside of this Statement's reporting period). Available at: <https://www.walkfree.org/global-slavery-index/downloads/>.



## Our Sustainability Framework

Our Sustainability Framework aligns with the issues our stakeholders have told us are material. As we drive performance, we aim to create impact under three pillars: making a difference to our environment, to our communities and with nourishing products.

### 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.

Key to our Sustainability Framework is our Supplier Sustainability Program (SSP). The SSP is a suite of initiatives that supports the implementation of the SunRice Group's sustainability strategy, Supplier Sustainability Code and other relevant policies that encourage respect for the human rights of workers in our operations and supply chain. The SSP Steering Committee, a cross functional body with representatives from across the SunRice Group, has oversight of the SSP. We also have a range of policies and processes that aim to minimise the risk associated with our recruitment and employment arrangements (see pages 17–18 for more information on our governance structure and policies).

7. In our FY2022 Modern Slavery Statement, our FY2022 Sustainability Snapshot and FY2023 Annual Report we committed to 100% of our owned sites having social and ethical audits by the end of FY2024. In line with our commitment to continuous learning and embedding flexibility within our modern slavery strategy and approach, as well as through the identification of synergies in the SunRice Group's approach to audits, this goal has been revised. Our refreshed approach prioritises reducing the risk of harm to people while also embedding an audit program that is ongoing, inclusive of evolving customer expectations, capacity building for relevant internal stakeholders and mindful of other audit programs that have overlap (for example, ISO 45001).

## Our goals and actions

We have established several goals to guide our approach to managing modern slavery, including:

- Embed robust governance systems for the SunRice Group's operations on human rights including modern slavery,
- Develop and implement a plan for conducting social and ethical audits at SunRice Group sites that prioritises sites based on human rights-related risks associated with our operations,<sup>7</sup>
- Minimise the risk of labour rights abuses in our operations and supply chain,
- Build internal capability to identify and remediate issues as they arise, and
- Foster open and trusted supplier relationships to identify and remediate labour rights issues across our supply chain.

Our goals serve as the foundation for our approach and provide a roadmap for the impact we hope to make. To help us achieve these goals, we identified specific actions to track our progress and promote clarity and alignment across the SunRice Group. The table on page 6 shows our progress against our planned actions for FY2023 (discussed in more detail throughout this Statement), as well as planned actions for FY2024.





## A commitment to continuous improvement

Aligned with our commitment to continuous improvement, we seek to evolve our approach to modern slavery risk management, including how we respond to changes in the global human rights landscape.

The following diagram shows our key actions from 2016 to 2022 and the table to the right outlines our progress and future actions.

### Key actions 2016–2022

- 2016–2018** Conducted first supply chain materiality assessment and piloted risk and impact assessment.  
Aligned SunRice Group Code of Conduct with UNGPs and adopted SunRice’s first Sustainability Charter.
- 2019–2021** Appointed a dedicated Sustainability Manager with a focus on human rights.  
Conducted initial supply chain mapping.  
Developed the Supplier Sustainability Code which was endorsed by the Board.  
Partnered with human rights consulting firm ELEVATE (now known as LRQA) to conduct supplier risk segmentation.  
Launched the SSP and commenced internal training and capacity building.  
Engaged with priority suppliers through Supplier Self-Assessment Questionnaires (SAQs) to better understand their profile and risk management practices.
- 2022–2023** Consolidated supplier inventory and refreshed supplier risk assessment.  
Conducted social and ethical audits (using Sedex Members Ethical Trade Audits (SMETA)) audits<sup>8</sup> of all SunFoods facilities.

8. SMETA is an audit protocol to understand standards of labour, health and safety, environmental performance, and ethics within an organisation’s operations or at a supplier site. The SMETA audit is designed to help protect workers from unsafe conditions, overwork, discrimination, low pay and forced labour. <https://www.sedex.com/solutions/smeta-audit/>

9. In our FY2022 Modern Slavery Statement, our FY2022 Sustainability Snapshot and FY2023 Annual Report we committed to 100% of our owned sites having social and ethical audits by the end of FY2024. In line with our commitment to continuous learning and embedding flexibility within our modern slavery strategy and approach, as well as through the identification of synergies in the Group’s approach to audits, this goal has been revised. Our refreshed approach prioritises reducing the risk of harm to people while also embedding an audit program that is ongoing, inclusive of evolving customer expectations, capacity building for relevant internal stakeholders and mindful of other audit programs that have overlap (for example, ISO 45001).

## Progress and future actions

Relevant goals	Planned actions for FY2023	Progress in FY2023	Planned actions for FY2024
<p><b>Governance</b></p> <p><b>Embed robust governance systems for the SunRice Group’s operations on human rights including modern slavery.</b></p>	<ul style="list-style-type: none"> <li>Maintain Board review of activities.</li> <li>Conduct regular program reviews by the SSP Working Group to evaluate program results and support continual improvement.</li> <li>Review and refresh modern slavery training program for employees and suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>Conducted SunRice Board and Corporate Management Team (CMT) refresher training on responsibilities under the Act.</li> <li>Strengthened our approach to governance of the SPP by elevating the SSP Working Group to a Steering Committee and expanding the standing members for a broader representation of business units and functional responsibilities.</li> <li>The modern slavery training program was placed on hold pending the statutory review of the Act.</li> </ul>	<ul style="list-style-type: none"> <li>Review and refresh modern slavery training program pending any changes to the Act.</li> <li>Commence review and update of the Supplier Sustainability Code.</li> <li>Policy development:                             <ul style="list-style-type: none"> <li>Consider developing and adopting a human rights statement.</li> <li>Develop an accommodation policy.</li> <li>Update Procurement Policy to integrate human rights considerations including modern slavery.</li> </ul> </li> </ul>
<p><b>Risk identification, assessment and management</b></p> <p><b>Develop and implement a plan for conducting social and ethical audits at SunRice Group sites that prioritises sites based on human rights-related risks associated with our operations.</b></p> <p><b>Minimise the risk of labour rights abuses in our operations and supply chain.</b></p> <p><b>Build internal capability to identify and remediate issues as they arise.</b></p> <p><b>Foster open and trusted supplier relationships to identify and remediate labour rights issues across our supply chain.</b></p>	<ul style="list-style-type: none"> <li>Review and refresh our internal and supplier risk assessment processes to reflect changes in operating context and evolving risks.</li> <li>Total of seven SunRice Group sites with refreshed social and ethical audits.</li> <li>Supplier Mutual Recognition Program making it easier for suppliers to comply with our Supplier Sustainability Code.</li> </ul>	<ul style="list-style-type: none"> <li>Conducted a social review of Australian Rice Growers to strengthen our engagement with rice growers, drive rice growers’ understanding of human rights issues and deepen our understanding of the potential human rights related risks, including modern slavery risks, in our Australian rice supply chain.</li> <li>Strengthened our management of modern slavery risks related to labour hire companies through an uplift to our Labour Hire Engagement Procedure.</li> <li>Conducted five social and ethical audits (using SMETA) of Australian Grain Storage (AGS) sites and of the CopRice Wangaratta site. To date, 12 audits of SunRice Group sites have been undertaken. This exceeds our target of seven sites with completed audits by FY2023.</li> <li>Continued work on the Supplier Mutual Recognition Program. This included mapping our Supplier Sustainability Code to various audit programs and exploring opportunities to apply this.</li> </ul>	<ul style="list-style-type: none"> <li>Using a risk-based and customer-centric designed approach, develop a revised audit plan for SunRice Group owned sites.<sup>9</sup></li> <li>Undertake social and ethical audits (using SMETA) of our sites in Vietnam, the Solomon Islands and at least two other Australian sites.</li> <li>Develop methodology to support suppliers to implement the Supplier Sustainability Code.</li> <li>Continue evolving our supplier screening and due diligence approach, including consideration of a range of due diligence and audit approaches used by our suppliers.</li> <li>Review supplier segmentation process.</li> <li>Review the process for entering new countries or markets to enable the SunRice Group to effectively identify and understand human rights-related risks.</li> <li>Establish an internal working group to examine the challenges associated with extensive working hours and seasonal work.</li> </ul>
<p><b>Remedy and grievance</b></p> <p><b>Build internal capability to identify and remediate issues as they arise.</b></p> <p><b>Foster open and trusted supplier relationships to identify and remediate labour rights issues across our supply chain.</b></p>	<ul style="list-style-type: none"> <li>Review Speak Up reports, investigations and responses to identify and address issues relating to modern slavery and potential precursors.</li> </ul>	<ul style="list-style-type: none"> <li>Anti-Bribery and Corruption Ambassadors conducted in person Speak Up training in Papua New Guinea (PNG) and Vietnam.</li> <li>Revised our policies and procedures concerning the employment of young workers.</li> </ul>	<ul style="list-style-type: none"> <li>Continue remediation of identified areas for improvement uncovered through social and ethical audits conducted in FY2023.</li> </ul>



# Our structure, operations and supply chain

## Our structure and operations

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

Ricegrowers Limited is a reporting entity under the Act. It was incorporated in Australia and listed on the Australian Securities Exchange (**ASX**) (Ricegrowers Limited: SGLLV), the SunRice Group now comprises multiple businesses, assets and operations in 10 countries across Australia, New Zealand, the Middle East, the United States, the Pacific Islands and Asia.

Riviana Foods is also a reporting entity under the Act. Riviana Foods is a brand-led gourmet food business and one of Australia's leading food importers. It is a wholly-owned subsidiary of the SunRice Group and is incorporated in Australia. With a uniquely diverse business, Riviana Foods manufactures, distributes and markets a number of brands across the retail, grocery and food service sectors in Australia and New Zealand.

The SunRice Group's operations are supported by various functions including, Research and Development, Health, Safety and Environment, Marketing and Sales, IT, Sustainability, Treasury, Legal and Finance.

A full list of our owned and controlled subsidiaries that are not reporting entities under the Act, but whose operations and supply chain form part of the operations and supply chain of the reporting entities, is provided in Appendix 2.

SunRice supports the interests of both A and B Class Shareholders. A Class Shareholders, who must be growers and meet the rice production criteria in our Constitution, are paid for their

paddy through the Rice Pool Business and have control of the company. SunRice's B Class Shareholders or investors have the right to receive any dividends generated by our Profit Businesses and other distributions made by the company from time to time. The shareholder classes, while separate, complement each other, strengthening the alignment between our investors and growers. For more details of the non-standard elements of the company's structure, see our investor website homepage [Investor Relations - Sunrice](#).

## SunRice Group global locations and EiQ country risk rating

- Global offices and operations
- EiQ country risk: low
- EiQ country risk: medium
- EiQ country risk: high
- EiQ country risk: extreme

EiQ is a third-party, supply chain ESG risk management and due diligence tool owned by ELEVATE/LRQA. EiQ calculates country risk using a range of tools and indices including results from audits, the Human Development Index, the GSI and other calculations associated with issues such as child labour, forced labour, working hours and wages. Environmental indices are also considered in the rating.

## Our objective is to optimise returns for both classes of shareholders





## Our businesses

### AUSTRALIAN RICE POOL BUSINESS

#### Australian Rice Pool

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

### PROFIT BUSINESSES

#### International Rice

Primarily purchases, processes and markets rice to supply international branded markets, tender markets or other processors.

#### Rice Food

Manufactures, markets and distributes value-added rice-based products such as rice cakes, snacks, rice flour, microwave rice and ready to go meals.

#### Riviana Foods

Manufactures, markets and distributes a number of brands across the retail grocery and food service sectors in Australia and New Zealand.

#### CopRice

Manufacturers, markets and distributes high quality animal nutrition and pet food products, using a range of ingredients including rice by-products.

#### Corporate

Holds rice receipt and storage facilities across the Riverina as well as rice milling and packing facilities across Australia; and manages the SunRice Group's brands.

## Our brands and products

The SunRice Group develops diverse, innovative and nutritious rice food products and ingredients that help make a difference to the lives of people in more than 50 countries. We have a number of major brands with significant market positions in 14 countries. An overview of our major brands is provided in Appendix 1.

In addition to our core business in rice food products, the SunRice Group has a growing animal nutrition and pet food business (**CopRice**) and a brand-led gourmet food business, Riviana Foods. The SunRice Group continues to expand in key markets and into new product categories through strategic acquisitions. During FY2023, The Australian Waffle Company was acquired by Riviana Foods.





### Our workforce

Our global workforce of over 2,000 people spans our businesses and geographies, with 95% of our global workforce employed on a full-time permanent basis. The remaining 5% are employed on a permanent part-time, temporary fixed term (including apprentices or contractors), or casual basis (including seasonal workers and labour hire workers).

Labour hire is an important part of the SunRice Group's ability to scale up our operations when responding to business needs and seasonal demands, for example around harvest time. We engage labour hire companies from time to time to provide us with the service of contracted workers in Australia, PNG and the United States (USA). For additional information on how we engage with labour hire companies see page 21.



Phạm Hữu Thọại, Quality Controller, Nguyễn Thị Thanh Thúy, Quality Technician and Nguyễn Thanh Long, Quality Specialist.



Janice Hiskett-Jones, SunRice Head of Reward and Carmel Mawter, Reward and Mobility Manager.



Kye Longford, Shift Coordinator Packing and Ratu Rahim, Packing Operator.

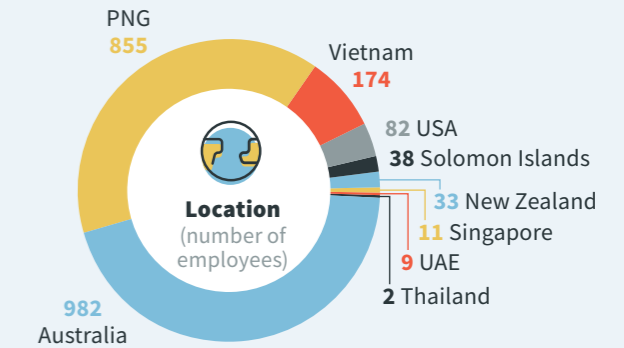
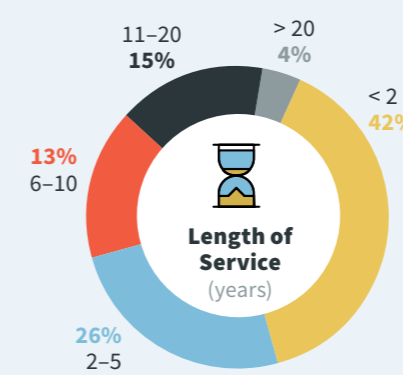
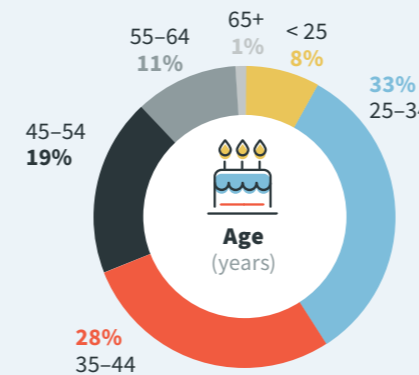
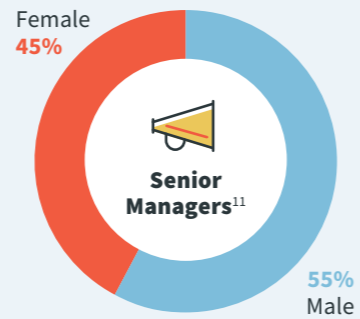
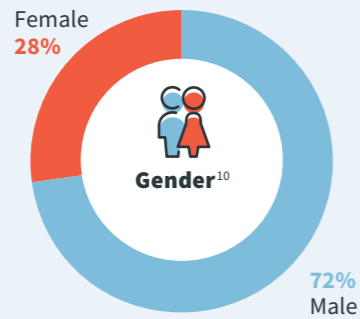


Michael Cottam, CopRice Senior Territory Sales Manager, South-West Victoria and Ganesh Kashyap, General Manager CopRice.



Trukai Industries' Safety Team

### Our global employee base as at 30 April 2023



10. 40% of our employees are based in PNG of which 79% are male. Due to the industry and nature of work in PNG, it is unlikely that the Group will reach gender parity in the near to medium term.  
11. Senior Management includes Senior Executives and their direct and indirect reports who have responsibility for the creation and implementation of long-term strategy, autonomy to operate and/or leadership responsibilities.



## Our supply chain

We take a multi-origin, multi-market approach to securing a reliable and adaptive global supply chain with rice comprising our largest procurement category in terms of volume and spend. In FY2023, we continued growing our supply chain globally and sourced close to 1.5 million equivalent paddy tonnes of rice from 12 countries<sup>12</sup> including Australia, to meet global demand. In addition to rice, other key products and services procured included raw materials (e.g. food ingredients), packaging and manufacturing and logistics services. We have both short and long-term contracts with suppliers depending on the type and nature of the product or service.

Procurement is managed by segment-specific procurement teams (Riviana Foods, CopRice and Global Rice, which includes International Rice and Rice Food) and a central Group procurement function. In FY2023, a new Head of Procurement was appointed who holds responsibility for streamlining procurement across the majority of the SunRice Group's activities. A data analytics tool was also developed during the reporting period to assist with centralising and analysing the Group's procurement data. These improvements will support us to assess and mitigate our modern slavery risks more effectively.

12. The SunRice Group's 12 rice sourcing countries in FY2023 were Argentina, Australia, Cambodia, China, India, Italy, Pakistan, Taiwan, Thailand, Uruguay, USA and Vietnam.  
13. In the listed categories (1) Professional services includes labour hire providers (2) Raw materials includes rice (3) Facilities management services includes personal protective equipment (PPE) (4) Contract manufacturing includes finished goods and outsourced manufacturing (5) Other includes IT and business travel and expenses.

### Procurement spend by category<sup>13</sup>

1	Raw materials
2	Logistics
3	Contract manufacturing
4	Professional services
5	Facilities management services
6	Packaging materials
7	Plant and equipment
8	Other (IT, business travel and expenses)

### Procurement spend by country

1	Australia
2	USA
3	Vietnam
4	Singapore
5	China
6	Thailand
7	New Zealand
8	Italy
9	France
10	Belgium

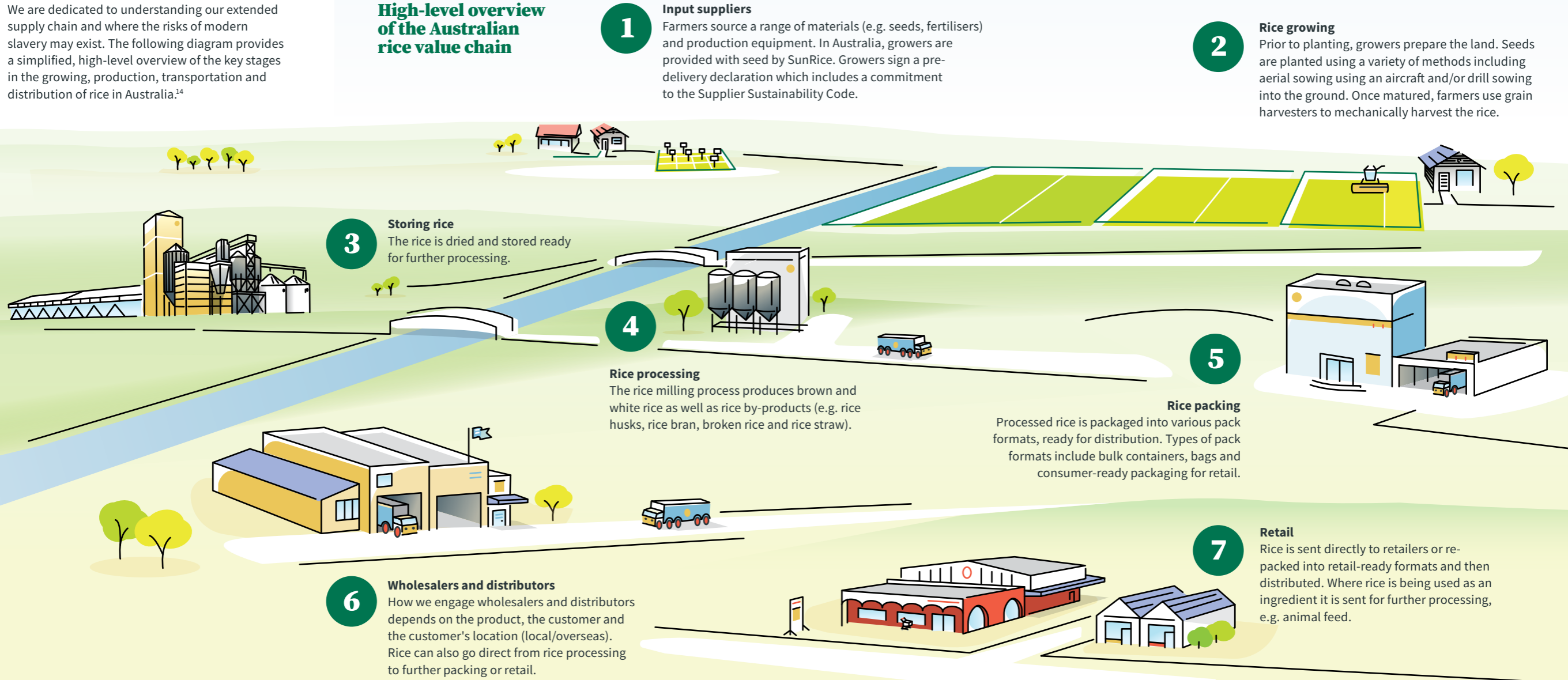




## Rice value chain

We are dedicated to understanding our extended supply chain and where the risks of modern slavery may exist. The following diagram provides a simplified, high-level overview of the key stages in the growing, production, transportation and distribution of rice in Australia.<sup>14</sup>

### High-level overview of the Australian rice value chain



<sup>14</sup> This is intended to provide a high-level overview of key parts of our value chain. Our actual value chain is highly complex and varies across businesses and jurisdictions.





Dale McLachlan, Site Manager, CopRice Wangaratta.

## Identifying and understanding our modern slavery risks

**The SunRice Group is a global food business with offices and operational sites<sup>15</sup> across ten countries and an extensive global network of rice and non-rice suppliers. As a result, our operating environment and modern slavery risk profile is dynamic and complex and we rely on a variety of sources to identify and understand our modern slavery risks.**

These include data and insights from the EiQ platform, the findings and outcomes of our social and ethical audit programs, supplier screening, our grievance mechanisms, multi-stakeholder initiatives such as the UN Global Compact and external expert advice.

The SunRice Group is committed to its responsibility to respect human rights as outlined in the UNGPs. In line with the UNGPs, we understand that through our operations and supply chain we may cause, contribute or be directly linked to modern slavery.

This is known as the continuum of involvement and the Australian Government's guidance on the Act encourages reporting entities to draw on this continuum in identifying and reporting on modern slavery risks.

We take a risk-based approach to managing modern slavery risks in our supply chain and operations. Given our global footprint and the diversity of goods we procure, we have identified that the most significant areas of modern slavery risk are in our supply chain and operations that are in countries reported to be high risk.

When identifying our modern slavery risks across our operations and supply chain, we understand that certain people and groups, such as migrant workers, are more at risk of modern slavery and other forms of exploitation. We are working to deepen our understanding of these vulnerabilities in our supply chain and operations and how different risk factors intersect.

For example, in Australia, we understand some of the challenges faced by migrant workers in rural areas include not only undertaking safe and healthy work, but also accessing clean and safe accommodation and being given access to adequate grievance mechanisms. We also acknowledge the interconnectedness of climate change and human rights risks including modern slavery. We have programs to manage our climate risk and build climate resilience which we will seek to integrate a human rights lens into.<sup>16</sup>

The following sections detail what we have assessed as our areas of greatest risk of involvement in modern slavery across our operations and supply chain.

### Hypothetical examples of potential involvement in modern slavery or worker exploitation in the agriculture sector

#### Type of involvement

##### Cause

**A business may cause modern slavery if its own actions or omissions directly result in modern slavery occurring.**

A company employs migrant workers recruited through an overseas agency without any regard or controls to guard against exploitation or modern slavery risks.

##### Contribute

**A business may contribute to modern slavery if its actions or omissions facilitate or incentivise modern slavery occurring to the extent that modern slavery would have been unlikely to occur without these actions or omissions.**

A company places unrealistic expectations on a supplier so that the only way the order can be met is by engaging in exploitative practices.

A business could also contribute to modern slavery if it ignores allegations about modern slavery. For example, it receives complaints about a labour hire company such as those relating to poor working conditions, excessive overtime or underpayment but does not take any action.

##### Directly linked

**A business's operations, products or services may be directly linked to modern slavery through the activities of a third party, such as a supplier.**

A business procures goods from a supplier that exploits workers in the course of producing that particular good. A business may be directly linked, even when it has a modern slavery clause in the supplier's contract and/or has engaged in due diligence.

15. Operational sites include AGS facilities, processing sites and manufacturing facilities.

16. For additional information on the SunRice Group's climate-related work, see 2023 Our Approach to Sustainability. Available at: [https://www.sunrice.com.au/book/Annual\\_Report\\_2023s.pdf#page=30/](https://www.sunrice.com.au/book/Annual_Report_2023s.pdf#page=30/).



## Potential risks of modern slavery in our operations

We have over 2,000 employees and offices, facilities and operations in 10 countries. Within our operations there are several areas where modern-slavery related risks may exist. These risks are related to both the nature of the work and the location in which it is conducted.

### Labour-related risks

Our risk assessment process highlights that there are reported higher risks of modern slavery, including forced labour related to the employment of casual and seasonal workers, migrant workers (including labour hire) and those in service-related roles (such as cleaning, logistics or security services). These risks apply to certain areas of our own operations, including our AGS sites.

The agricultural sector globally relies on temporary labour to meet the demands of seasonal activities such as the sowing and harvesting of crops. Our primary operations include the receiving, storing and milling of rice, which means that our operations are impacted by the seasonal nature of the sector. For example, during the rice harvest season in Australia, we use labour hire workers to assist with increased demands associated with receiving and storing of rice paddy at AGS. In the USA, we employ temporary or casual workers in our manufacturing facilities when we need to increase production to meet customer requirements.

We recognise that casual and temporary workers tend to have fewer employment protections compared to those in permanent positions, including working time protections, sick pay and protection against unfair dismissal.

We also understand that the lack of protections, combined with a lack of job security, may cause workers to accept exploitative conditions, low wages and poor treatment to maintain an income. For migrant workers, many of these challenges can be compounded by barriers in language proficiency, limited understanding of regulatory protections and visa issues. The use of labour hire companies creates additional risks for the SunRice Group, which is discussed further on page 21.

### Geography-related risks

Geography plays a role in shaping the risks of modern slavery. In some of the countries we operate in, including PNG, Solomon Islands and Vietnam, there are higher inherent risks of human rights harm, including modern slavery. For additional information on our geography-related modern slavery risks, refer to the map on page 15. While we recognise that some countries have a reported higher risk of modern slavery, we know that no country in the world is free from modern slavery, including Australia.<sup>17</sup> Acknowledging this, during the reporting period we focused on developing a clear understanding of potential modern slavery and other labour exploitation risks associated with rice growing in Australia (see page 16 for further details). We will build on the work that we have done in Australia and continue improving our understanding of modern slavery risks across our global operations and supply chain.

## Case Study Review of Australian Grain Storage (AGS)

AGS is a member of the SunRice Group. It operates grain storage infrastructure in the Riverina region. Five social and ethical audits were completed at AGS sites in March 2023, utilising the SMETA protocol. As part of our risk-based approach to audits, the five sites were selected because they have the greatest number of workers, including labour hire workers.

The purpose of SMETA audits is to help us understand the labour, health, safety and environmental performance of a particular site. The process is conducted by a SMETA approved auditor and is designed to identify risks to workers related to unsafe working conditions, overwork, discrimination, underpayment and forced labour. To become a Certified Social Compliance Auditor, auditors need to undertake training which involves observing and participating in audits and completing an exam.

Prior to the audits, a Toolbox Talk was conducted at each of the sites. During that process workers were educated on the purpose of the audit, what it involves and our commitment to creating a culture where workers feel safe to speak freely and openly about concerns or issues. Workers were also given information about their rights and reminded of the SunRice Group's Speak Up reporting process and the Ethical Trading Initiative (ETI) Base Code.<sup>18</sup>

### Findings and next steps

Based on the audit findings, our assessment of the risk of modern slavery practices at the audited AGS sites is low. The audits found that workers were aware of the SunRice Group's policies, expectations and grievance mechanisms and that overall, workers were satisfied with site management.

The audits identified areas for improvement in relation to working hours during peak periods which is reflective of the seasonal nature of work at AGS. Refer to our case study on 'Reducing risks associated with extensive working hours over a condensed period' at AGS on page 19 for more detail.

### Additional insights

There are some limitations associated with conducting audits to identify and assess matters related to human rights issues, including modern slavery and other forms of labour exploitation. These include that audits provide only a snapshot in time and workers may not always feel comfortable raising issues due to fear of retaliation or job security. However, we found that the process created an opportunity to directly engage workers in conversations about their rights, the SunRice Group's commitments and the relevant reporting channels.

Having a Group Sustainability team member present for the SMETA audits and engaging with workers also led to the identification of additional potential risk areas, including the provision of housing to a small group of labour hire workers. An inspection of the accommodation did not reveal any issues of immediate concern; however, this finding did reveal some gaps in our policies. As a result, in FY2024, we are assessing our approach to the provision of accommodation and have committed to developing an accommodation policy.



AGS Benerambah, NSW, Australia

A SMETA audit was also completed at our CopRice manufacturing facility in Wangaratta, Victoria which, based on the audit findings, our assessment of the risk of modern slavery practices is low. The audit team noted that facility management demonstrated a positive attitude to the audit and agreed with the issues raised and that workers were positive towards their workplace and the working conditions. The audit identified two improvement areas which have been addressed.

Refer to our case study on 'Reducing risks associated with younger workers' on page 19 for more detail.

17. Walk Free. The Global Slavery Index 2023. Available at: <https://www.walkfree.org/global-slavery-index/downloads/>.

18. The ETI Base Code is an internationally recognised set of labour standards based on ILO Conventions. Available at: <https://www.ethicaltrade.org/eti-base-code>.





Brian Kasit, Trukai Field Officer and Bob Lango, Smart Farmer.

## Potential risks of modern slavery in our supply chain

Our process for identifying and assessing the modern slavery risks in our supply chain is conducted primarily through ELEVATE's/LRQA's integrated risk platform, EiQ. The EiQ platform draws on publicly available data sets, such as the GSI, along with proprietary supply chain risk information. Through EiQ, we consider the geography, sector, product, services and labour related risks in our supply chain and have identified several high-risk procurement categories. In addition, we monitor any issues raised through the Speak Up reporting channels on a regular basis and update our risk profile and controls where relevant.

Recognising that our risk profile evolves over time, we plan to use EiQ to review our modern slavery risk profile in FY2024 in relation to geographic risk, product risk and broader environmental, social and governance risks associated with our suppliers. This will help keep our risk profile up to date and support appropriate mitigation efforts.

The SunRice Group procures rice and other ingredients from the agricultural sector globally. This sector, according to the ILO, has the fourth highest number of confirmed forced labour cases out of all industries due to the labour intensive and highly seasonal nature of work, leading to the use of temporary and casual labour.<sup>19</sup> In addition, the sector is also exposed to child labour, including in countries from which we procure rice and other ingredients. We acknowledge that we may be exposed to these modern slavery related risks in our supply chain.

19. International Labour Organization (ILO), Walk Free and International Organization for Migration (IOM) (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. Available at: <https://publications.iom.int/books/global-estimates-modern-slavery-forced-labour-and-forced-marriage>

The following table provides an overview of goods and services that we have determined could be high-risk for modern slavery, including the most likely potential risks and key risk factors for each category. The actions taken to mitigate these risks are outlined in the following section on 'Assessing and addressing our modern slavery risks' (on page 17).

Goods and services	Potential modern slavery risks	Key risk factors
<b>Rice</b>	Forced labour, debt bondage, human trafficking, child labour, deceptive recruitment, underpayment of wages, excessive working hours	<ul style="list-style-type: none"> <li>Reliance on vulnerable or at-risk workers (e.g. migrant workers).</li> <li>Use of labour hire companies is common, with potential risks of misleading and exploitative recruitment practices.</li> <li>Meeting seasonal demands can create risks in relation to excessive working hours.</li> <li>The work may be undertaken in high-risk countries.</li> </ul>
<b>Manufacturing</b>	Forced labour, child labour, debt bondage, deceptive recruitment, underpayment of wages, excessive working hours	<ul style="list-style-type: none"> <li>Reliance on vulnerable or at-risk workers (e.g. lower skilled workers, migrant workers).</li> <li>Use of labour hire companies is common, with risks of misleading and exploitative recruitment practices.</li> <li>The work may be undertaken in high-risk countries.</li> </ul>
<b>Shipping and marine transport</b>	Forced labour, debt bondage, human trafficking, child labour, deceptive recruitment, underpayment of wages	<ul style="list-style-type: none"> <li>Reliance on vulnerable or at-risk workers (e.g. migrant workers).</li> <li>Risk of hazardous work and poor living conditions.</li> <li>Limited visibility within shipping, with challenges around gaining access or conducting audits.</li> </ul>
<b>Labour hire companies</b>	Debt bondage, deceptive recruitment, underpayment of wages	<ul style="list-style-type: none"> <li>Reliance on vulnerable or at-risk workers (e.g. migrant workers).</li> <li>Risks related to misleading recruitment, identity documentation retention and the charging of recruitment fees.</li> </ul>
<b>Facility management</b> (e.g. cleaning, security, waste management, repairs and maintenance)	Debt bondage, deceptive recruitment, underpayment of wages	<ul style="list-style-type: none"> <li>Reliance on temporary and casual labour and may have a high representation of migrant workers.</li> <li>Reliance on labour hire companies with risks of misleading and exploitative recruitment practices.</li> </ul>
<b>PPE and uniforms</b>	Forced labour, debt bondage, deceptive recruitment, underpayment of wages, excessive working hours	<ul style="list-style-type: none"> <li>Involves complex and opaque supply chains and may involve high-risk inputs such as cotton and rubber.</li> <li>Reliance on vulnerable or at-risk workers (e.g. lower skilled workers, migrant workers).</li> <li>Manufacturing and extraction of raw materials often takes place in high-risk countries.</li> </ul>
<b>Solar panels</b>	Forced labour, debt bondage, human trafficking, deceptive recruitment, underpayment of wages	<ul style="list-style-type: none"> <li>Involves complex and opaque supply chains and includes high risk inputs like polysilicon.</li> <li>Manufacturing process and extraction of raw materials often takes place in high-risk countries.</li> </ul>



**Rice**

As a commodity, rice is considered to hold a high-risk of human rights issues globally, due to its association with incidences of child and forced labour in multiple countries of production.<sup>20</sup> In FY2023, we sourced rice from 12 countries and regions worldwide, including Australia.

The SunRice Group is a significant purchaser, processor and marketer of Australian rice grown in the Riverina region, where approximately 98 per cent of Australia’s rice is grown.<sup>21</sup> Most of the Australian rice we source is grown on broadacre properties (i.e. large and open rural or agricultural land), where there is a high degree of mechanisation in the planting and harvesting processes and therefore has limited need for manual labour. During FY2023 we conducted a social review of a sample of our Australian rice growers’ labour practices to develop a better understanding of the potential risks within the sector and to provide greater transparency (see case study on page 16).

Outside of Australia, we source from rice suppliers located in countries with reported higher risks of modern slavery. We determine what comprises a high-risk country based on data presented in the EiQ database.



**Rice source countries and EiQ risk rating**

- Rice supply sources
- EiQ combined country and product risk: low
- EiQ combined country and product risk: medium
- EiQ combined country and product risk: high
- EiQ combined country and product risk: extreme

EiQ is a third-party, supply chain ESG risk management and due diligence tool owned by ELEVATE/LRQA. EiQ calculates country risk using a range of tools and indices including results from audits, the Human Development Index, the GSI and other calculations associated with issues such as child labour, forced labour, working hours and wages. Environmental indices are also considered in the rating. EiQ considers that rice carries extreme levels of risk globally predominately due to high levels of social and environmental risks compared to other farming, agricultural and aquaculture-based commodities.



20. ILO, Walk Free and IOM (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. Available at: <https://publications.iom.int/books/global-estimates-modern-slavery-forced-labour-and-forced-marriage>  
 21. Refer to: <https://investors.sunrice.com.au/DownloadFile.axd?file=/Report/ComNews/20190405/02093814.pdf>



## Case Study

### Social review of Australian Rice Growers

We conducted a social review of Australian rice growers in the Riverina region with the aim of strengthening our relationship with them, driving engagement on social sustainability areas and deepening our understanding of the potential human rights risks, including modern slavery risks, in our local rice supply chain. The review was timed to coincide with rice harvest as one of the two peak periods for growers (the other being sowing), to ensure there were the maximum number of workers onsite.

#### Methodology

- A statistically representative sample of growers across the Riverina was randomly selected from 408 businesses with 36 growers interviewed, as well as farm managers and workers (who were interviewed separately).
- Of the growers who were contacted, 80 per cent responded to the SunRice Group's request.
- Interviews of individual rice growers were conducted on-farm.
- Interview questions were aligned to ELEVATE's Ag-ERSA tool which was developed fit-for-purpose for ethical farm audits and to the SunRice Group's Supplier Sustainability Code, including questions relevant to modern slavery related risks.

#### Findings

Based on the findings of the review, our assessment of the risk of modern slavery for the included farms was low. This may be due to a number of factors, including that the majority of workers on the farms are family members or local, skilled or specialised contractors (i.e. crop dusters, truck drivers, pilots for sowing) and that rice growing is highly mechanised thereby reducing the need for additional workers.

In addition, it was identified that growers who grew horticulture crops were more likely to use labour hire during peak periods. However, our review did not include growers' labour practices for the non-rice parts of their businesses.

#### Next steps

The SunRice Group is supporting the RGA to define priorities moving forward and develop an approach to improving growers' understanding of modern slavery risks. These capacity building initiatives may be delivered through existing mechanisms, such as grower meetings, or broader Riverina-wide initiatives.

## Case Study

### Engaging with suppliers to understand modern slavery risks in the solar sector

There have been a number of reports in relation to labour risks in the solar supply chain including child labour in mineral extraction and forced labour in polysilicon manufacturing (a key component in solar panels).<sup>22</sup> The supply chains associated with solar panels are also opaque and complex making it challenging to have a complete understanding of the risks in relation to the sourcing of raw materials, production and manufacturing.

In FY2023, a 1MW solar photovoltaic project was commissioned at our Woodland Mill in California. During FY2023, we undertook desk-based research and supplier engagement with a Tier 1 supplier to get a better understanding of the key challenges in identifying and addressing modern slavery within the solar sector. During the supplier engagement, information was provided regarding the supplier's policies, their process to engage suppliers and how they trace the raw materials in their supply chain.

Following consideration of the information received, we engaged the supplier for the project. However, given the complexities of



solar panel supply chains, it can be very difficult to undertake comprehensive due diligence and continued efforts are required to reduce the risk of modern slavery.

While our overall spend on solar is limited in proportion to other categories, we acknowledge that this is a high-risk product for modern slavery. As we continue to move towards our goal of net zero emissions,<sup>23</sup> we will deepen our due diligence process, including supplier screening and engagement, in relation to the purchase of solar panels.

22. Labour risks in the solar supply chain have been reported by a number of organisations. One example is the US Department of Labor's List of Goods Produced by Child and Forced Labour. Available at: <http://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>.

23. The SunRice Group is committed to net zero by 2050 including developing our net zero roadmap and submitting our Science Based Target (SBT) for validation to the SBT initiative (SBTi) in FY2024. For additional information see 2023 Our Approach to Sustainability. Available at: [https://www.sunrice.com.au/book/Annual\\_Report\\_2023.pdf#page=30](https://www.sunrice.com.au/book/Annual_Report_2023.pdf#page=30).





## Assessing and addressing our modern slavery risks

24. Safety, Health & Sustainability Committee Charter (2021). Available at: [https://investors.sunrice.com.au/FormBuilder/\\_Resource/\\_module/2weQNICYsUy13FE\\_jxQXvg/file/corporate-governance/committees/Ricegrowers\\_Limited-SHS-Committee-Charter\\_FINAL.pdf](https://investors.sunrice.com.au/FormBuilder/_Resource/_module/2weQNICYsUy13FE_jxQXvg/file/corporate-governance/committees/Ricegrowers_Limited-SHS-Committee-Charter_FINAL.pdf).

25. Paul T. Parker resigned from the SunRice Group in early FY2024.

### Governance

Our governance framework is crucial in supporting our approach to sustainability, as well as our human rights risk management approach, including modern slavery risks. Our framework seeks to ensure alignment with our values and policy commitments throughout our operations and supply chain and provide clear lines for responsibility and accountability.<sup>24</sup>

#### Corporate Management Team (CMT)

##### Dimitri Courtelis

Chief Financial Officer

##### Kate Cooper

General Counsel and Company Secretary

##### Stephen Forde

Chief Executive Officer, Riviana Foods Pty Ltd

##### Ganesh Kashyap

General Manager, CopRice

##### Belinda Tumbers

Chief Executive Officer, Global Rice

##### Paul T. Parker<sup>25</sup>

General Manager, People and Culture

##### Alan Preston

Chief Executive Officer, Trukai Industries Limited

### Governance of modern slavery risks at the SunRice Group

#### SunRice Group Board

The Board has responsibility for overseeing and monitoring the effectiveness of the Group's sustainability performance and of the Group's systems and processes for legal and regulatory compliance, including with the Act.

#### Safety, Health and Sustainability (SHS) Committee

Oversight of health, safety and sustainability matters for our own operations, including the Supplier Sustainability Program. Updates on sustainability performance are shared with the SHS on a quarterly basis.

#### SunRice Group CEO

Corporate Management Team (CMT)

#### Supplier Sustainability Program (SSP) Steering Committee

Responsible for identification of and decision-making for modern slavery risks relating to our supply chain, including advising on supplier issues as they arise and identifying any issues that should be escalated to the SHS Committee or the SunRice Group Board. Meets every six to eight weeks, or more frequently if required.

#### Membership includes:

- General Counsel and Company Secretary
- General Manager, People and Culture
- Group Head of Finance
- Group Head of Sustainability
- Group Head of Procurement
- Head of Global Supply Chain and Manufacturing
- Head of Operations, CopRice
- Head of Agribusiness
- Head of International Sourcing, Global Rice
- Head of Research and Development, Global Rice
- Chief Financial Officer, Riviana Foods
- Social Sustainability Manager

#### Sustainability Team

Responsible for day-to-day implementation of human rights risk management (including modern slavery), escalating issues as required and defining the SSP Strategy.



## Policies

We have several policies in place that are relevant to modern slavery. These policies are informed by internationally recognised human rights standards and industry collaborative codes such as the ETI Base Code.

The policies listed below are endorsed by senior management and, where appropriate, by the SunRice Board. Some of the policies listed on this page are specific to Australia rather than being Group policies. We recognise that we still have work to do to improve how we embed our policies across the Group and ensure consistency in our approach.

Our policies are communicated to employees through the SunRice Group intranet, email, training modules and other forms of multi-media (such as videos). During the reporting period, the Sustainability Charter was updated and changed to an ESG Commitment. The new ESG Commitment strengthens the SunRice Group's human rights related commitments by specifically acknowledging our responsibility to respect human rights in accordance with the UNGPs and articulating our expectations of our employees and suppliers.



### SunRice Group Code of Conduct

#### Relevance to modern slavery

Defines our standards, values and behaviours in terms of how we operate as a business, including our commitment to the UNGPs. It places an expectation on employees, suppliers and their sub-tier suppliers to respect all human rights, including labour rights, throughout their business activities. Specifically, it confirms that the use of child labour is not tolerated.

#### Key implementation actions

Our employees receive mandatory training on the Code of Conduct as part of their induction training. The training is required to be completed every two years. Information related to the Code of Conduct is also included in the SunRice Group employee booklet at induction.



### SunRice Group Labour Rights Standards Policy

#### Relevance to modern slavery

Outlines our adherence and commitment to the ILO Core Conventions, including the Forced Labour Convention, 1930 (No. 29), the Abolition of Forced Labour Convention, 1957 (No. 105), Minimum Age Convention, 1973 (No. 138) and the Freedom of Association and Protection of the Right to Organise Convention 1948 (No. 87). Specific focus is placed on freedom of association, forced labour and human trafficking, child labour, working hours, wages and benefits, servitude, diversity and inclusion.

#### Key implementation actions

The expectations outlined in our Labour Rights Standards Policy are included as a key component of the training associated with the SunRice Group Code of Conduct, the Supplier Sustainability Code and the Group's mandatory modern slavery training. Any employees, former employees, contractors or supply chain workers can make a report related to labour rights through Speak Up.



### SunRice Group Speak Up Policy

#### Relevance to modern slavery

Governs our whistleblower and grievance mechanism and processes and clearly defines our investigation and escalation processes. Human rights-related concerns, including those related to modern slavery, can be raised through the Speak Up channels by a range of people including employees, contractors, supply chain workers and those who come into contact with our operations.

#### Key implementation actions

Our Speak Up Policy is available in English, Vietnamese, Arabic and Pidgin on our website. Our internal Ambassadors (located in Vietnam, Solomon Islands and PNG) receive specific training regarding anti-bribery and corruption and then deliver Speak Up training to those employees who do not have access to computers or who need support in local language. The Ambassadors promote the Policy and make themselves readily available to employees, to provide workers with an option of raising issues with a trusted internal representative. Information related to the Speak Up Policy is included in the SunRice Group employee booklet that is provided to employees at induction.



### ESG Commitment (previously Sustainability Charter)

#### Relevance to modern slavery

Sets out our Group-wide commitment to the environment, communities and consumers. It includes our commitment to the UNGPs and reaffirms our expectation of our business, employees and suppliers to respect all human rights, including labour rights, throughout our operations and supply chain.

#### Key implementation actions

Our updated ESG Commitment was finalised in November 2022.



### SunRice Group Supplier Sustainability Code

#### Relevance to modern slavery

Outlines our standards and expectations of business practice for suppliers across the SunRice Group and includes provisions around preventing forced labour practices and exploitation within our supply chain.

#### Key implementation actions

Our Supplier Sustainability Code is available on our website in English. Targeted training is conducted with key business functions, see page 21 for additional information.

Clauses referring to the Supplier Sustainability Code are included in most of our contracts to outline our expectations to our suppliers and support compliance with our Code.



### SunRice Group Child Labour Remediation Guidelines (internal)

#### Relevance to modern slavery

Supports the SunRice Group's Labour Rights Standards Policy in outlining the Group's commitment to the prohibition of hiring individuals who are under the legal working age in the countries in which we operate. The Guidelines reiterate our commitment to meeting fundamental labour standards globally. The document also outlines the actions to remediate in instances where a case of child labour is identified.

#### Key implementation actions

Individuals are screened upon job application to ensure that they are of legal working age and ensure that if they are under 18, they are not involved in hazardous work. Prior to an offer of employment, age checks are conducted by a third party. Where a worker is under 18 they only work day shifts.



### Labour Hire Engagement Procedure (internal)

#### Relevance to modern slavery

Outlines our approach for engaging labour hire workers. It focuses on ethical labour practices, particularly for migrant workers. It details procedures for onboarding, compliance and ongoing engagement, aligning with codes of practice and legal requirements.

#### Key implementation actions

The procedure was approved shortly after this reporting period (May 2023). Work has commenced to roll out the procedure across some of our operations. For more information, please see page 21.



### Procurement Policy (internal)

#### Relevance to modern slavery

Details the principles and procedures for procurement within the SunRice Group. It covers various aspects such as social and ethical sourcing, risk management, vendor management and compliance with anti-bribery and corruption policies.

#### Key implementation actions

Our Procurement Policy will be updated in FY2024 to provide greater guidance across the SunRice Group on procurement processes and will include human rights considerations, including modern slavery.



### Grievance Policy<sup>26</sup> (internal)

#### Relevance to modern slavery

Outlines how the SunRice Group addresses workplace grievances, aiming for a harmonious environment by resolving conflicts promptly and fairly. It defines the steps for raising grievances, outlines the resolution process and highlights confidentiality and accountability. This Policy applies to employees only.

#### Key implementation actions

The Grievance Policy is made available to employees on our intranet.

26. Policy is applicable to Ricegrowers Limited and its Australian subsidiaries.



## Operational risk management

We seek to mitigate our operational risks through a range of policies and processes that govern our approach to recruitment and employment arrangements. These include our Code of Conduct and Labour Rights Standards Policy (see page 18) which set out clear expectations around respecting labour rights. Other controls include mandatory training, an accessible grievance mechanism and dedicated Ambassadors to promote reporting channels (discussed further on pages 22–23).

As discussed, social and ethical audits were completed in FY2023 for five of our AGS sites and one of our CopRice sites at Wangaratta, using the SMETA audit protocol. We continue to deploy an audit program for our own sites, with audits planned over FY2024 for a number of sites in Australia, as well as our operational sites in the Solomon Islands and Vietnam. During FY2024, we will also develop a calendar for operational audits guided by the risk profile of our sites.



### Due diligence in action: Reducing risks associated with younger workers

The SunRice Group provides employment opportunities to younger workers (aged 16–18) predominately through apprenticeship programs. Younger workers are provided with hands on experience, practical skills, mentoring and support. This can lead to future ongoing employment opportunities not only within the SunRice Group but across other industries. To support our approach to managing younger workers, we have controls in place that are informed by relevant legal requirements and our commitments to international standards.

During the reporting period, a report was made that 17-year-olds were working evening shifts at SunRice Group sites in Australia. Whilst hiring workers between 16 and 18 years of age is legal, we decided to redeploy these individuals to daytime shifts to meet international standards (including ETI). We have subsequently updated our internal recruitment guidelines and system to include a new mandatory selection criteria for an evening-shift worker that they are at least 18 years old. We also updated the SunRice Group Labour Hire Engagement Procedure to reflect these changes.

27. According to article 4.3 of the ETI Base Code, children and young persons under 18 should not be employed at night or in hazardous conditions. Available at: <https://www.ethicaltrade.org/eti-base-code>.

28. According to article 6.5 of the ETI Base Code, exceptional circumstances arise when: it is allowed by national law; it is allowed by a freely negotiated collective agreement representing a significant portion of the workforce; appropriate safeguards are taken to protect the workers' health and safety; and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.



Graham Maw, Depot Supervisor, Deniliquin AGS  
and Michael O'Sullivan, Operator, Deniliquin AGS.

### Due diligence in action: Reducing risks associated with extensive working hours over a condensed period at AGS

Following a review of the outcomes of the AGS site audits held in March 2023 (see page 13), we established a Working Group to better understand the issue and challenges, including labour needs and requirements, related to long working hours, particularly around harvest time. Under ETI<sup>27</sup> and the SMETA audit protocol, extensive working hours are considered to occur where working hours exceed 60 hours a week over a seven day period, except when exceptional circumstances arise<sup>28</sup>

To inform our approach, the Working Group will review existing, and relevant, SunRice Group policies and procedures to understand their effectiveness and any potential gaps, having regard to seasonality. We will also develop an action plan to enhance our approach to managing risks related to working hours in our operations.



### New country or market screening

Prior to entering a new country or market for the sourcing of rice, a risk assessment is conducted to identify, evaluate and manage a range of risks including those pertaining to governance, economic, environmental and human rights. A cross-section of our business is included in the risk assessment and decision-making process, including Global Sourcing, Quality, Sustainability, Risk, Treasury and Legal.

As part of our commitment to continuous improvement, in FY2024 we will conduct a review of the process for entering new countries (for the purposes of sourcing rice, establishing new milling operations or partnering with processing companies with an existing presence).

The purpose of the review is to ensure that the process is fit-for-purpose, appropriately identifies the human rights-related risks including modern slavery within new countries and markets and is being effectively embedded across our operations.



## Supply chain risk management including supplier due diligence

We conduct our supplier risk assessments through the EiQ platform. We aim to review our approach every two years to assist in making changes to our risk profile so that it reflects the evolving modern slavery and operational risk landscape.

### Supplier segmentation

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

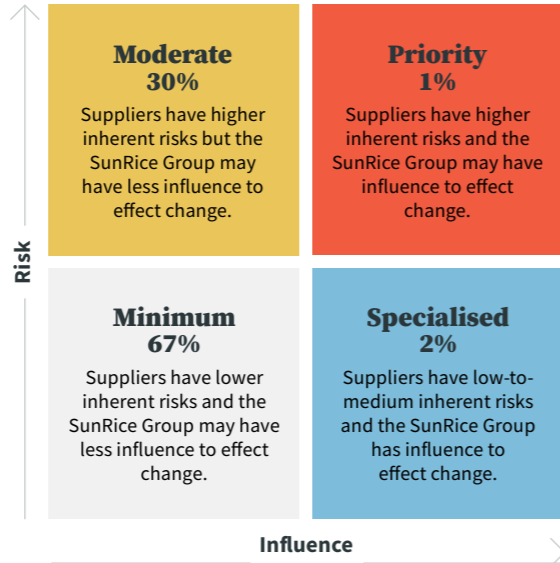
#### 1. Risk: The inherent risk of the supplier, including modern slavery related risks

Through EiQ we assess inherent supplier 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 supplier's country, as well as the workforce characteristics and business processes associated with the products/services sourced.

#### 2. Supplier: The degree of potential influence the SunRice Group has with our suppliers

To understand the potential level of influence we have with suppliers, we consider factors such as the nature and length of our business relationship, market dynamics and changes in spend and business volume over time. In general, we consider that we have a high degree of influence with those suppliers that we have a direct contractual relationship with and where we have a sustained engagement over a period of time.

### Overview of supplier segmentation<sup>29</sup>



This risk assessment and segmentation process enables us to identify the intersection of supplier engagements where we may have influence to effect change and where the innate risk is highest. This helps us to prioritise our efforts in terms of where we can have the greatest impact. We recognise that by prioritising our level of influence, we may not capture all of our high-risk areas. As our capability grows and our risk assessment process continues to evolve, we will look to broaden our approach. An ongoing priority for us is to develop strong internal communication lines and build internal capacity so that if a supplier exhibits a risk indicator it can be reviewed, even if it does not fall within the priority category. The updated Procurement Policy (to be completed in FY2024) and revised modern slavery training program (to be updated pending any changes to the Act) will provide important guidance in this area.

#### Strengthening engagement to influence change

The UNGPs uses the term 'leverage' in reference to the influence that businesses have over other entities, such as suppliers, contractors and business partners, to prevent and address adverse human rights impacts. We are committed to using our influence to effect positive human rights outcomes through supplier engagement, industry collaboration and multi-stakeholder engagement. Our engagement with Australian rice growers is one area where we have sought to strengthen our relationships. Through the social review of Australian rice growers (see page 16), we have deepened our engagement with growers and created an opening for ongoing dialogue beyond formal reviews and meetings. We see this engagement as mutually beneficial, where we can both raise issues of concern and explore opportunities to strengthen collaboration.

### Supplier screening

EiQ enables us to undertake a risk assessment of suppliers based on the supplier segmentation process and screening process as shown below. This process is still in its infancy and will evolve over time.

#### New priority suppliers

All new priority suppliers (i.e. high-risk based on supplier segmentation) go through a screening process.

Priority suppliers are required to provide additional information on their risk management practices (including in relation to modern slavery) through a SAQ. If issues or areas of concern arise, an audit will be requested.

#### Existing priority suppliers

Priority suppliers are required to complete an updated SAQ every two years, or an audit if certain high risk factors are identified.

#### Suppliers that remain high-risk post screening

Decisions regarding suppliers that remain high or extreme risk after detailed risk assessment and suppliers that do not engage with us regarding their modern slavery practices, are escalated to our SSP Steering Committee. Depending on the nature of the risk and the supplier's response, the issue might also be escalated to our CMT, SHS Committee and, if necessary, the SunRice Board.

We aim to conduct supplier screening before contracting with suppliers. Where this pre-screening does not occur, we look to build audit requirements into the contract and conduct screening processes after contracting with the supplier. We continue to monitor our practices and look for opportunities to strengthen our approach including by working on processes to uplift the number of suppliers screened prior to onboarding in the future.

As procurement practices across the SunRice Group are, to an extent, decentralised, supplier screening is often coordinated and monitored by the Sustainability team. In FY2024 we will work to integrate supplier screening and human rights knowledge and expertise into other key business areas, including our procurement teams. A priority for FY2024 is to strengthen the consistency of our supplier screening process across the SunRice Group. This includes building recognition of a range of due diligence methods used by our suppliers into our own supplier screening and due diligence process, with the aim to reduce complexity, improve efficiency of supplier monitoring and reduce audit fatigue for our suppliers.

Most supply contracts entered into across the SunRice Group contain clauses that require the supplier to adhere to the Supplier Sustainability Code (see page 18 for more information on the Code). However, we recognise that our ongoing engagement with suppliers, including in relation to increasing our suppliers' understanding of modern slavery risks, is an area that requires greater focus moving forward.

29. Percentage refers to number of suppliers per segment; not spend.



**Assessing risk in action:  
Supplier engagement at  
Riviana Foods**

As part of managing its supplier base, Riviana Foods has implemented an online system to manage supplier onboarding, engagement and monitoring. This platform holds supplier data in one place and enables Riviana Foods to track engagement with its suppliers and monitor data to identify potential risks, including those in relation to modern slavery.

Riviana Foods' supplier onboarding process requires its suppliers (regardless of whether or not they are considered priority under the supplier segmentation) to complete an SAQ that covers a range of areas related to product quality, food safety and labour rights. Suppliers are also provided with the Supplier Sustainability Code as part of the onboarding process and, where relevant, SEDEX membership is requested.

During the supplier onboarding process if concerns relating to labour rights, modern slavery and other areas included in our Supplier Sustainability Code are identified, the team will seek additional information and/or documentation. This may include requesting that the supplier perform a SMETA (or equivalent) audit for the site as a condition of engagement.

**Due diligence in action:  
Reducing risks associated with  
labour hire companies**

In FY2022, 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 of these practices. Areas for improvement and standardisation were noted through the review as our Group Sustainability, People and Culture and Legal teams worked together to identify the best strategies for improving our processes.

As a result of this review, we commenced the roll-out of a new procedure in FY2022 to ensure that labour hire companies meet strict criteria, prior to being approved to work with the SunRice Group. This process includes ongoing proactive screening of existing and potential suppliers.

Our first year of implementation identified various challenges and as a result (and in line with our commitment to continuous improvement), during the reporting period we focused on updating the Labour Hire Engagement Procedures. Contracts are now in place with labour hire companies that we engage. If a labour hire company does not meet the requirements of the procedure, we do not engage them. We will focus on further embedding this process in FY2024.

**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 to the success of our modern slavery approach. Our training framework, outlined below, helps employees understand the SunRice Group's expectations, how this relates to their roles and responsibilities and how it supports the goal of embedding our commitment across the business.

Our employees continued to receive eLearning training through a module entitled Our Approach to Sustainability: 'Recognising the risks of Modern Slavery.' This module is mandatory for all permanent employees and must be completed every two years. The training provides an overview of modern slavery including its prevalence, indicators and key risks for our business. The training also provides information on where to raise concerns and the requirements of the Act. As our understanding of our risk profile evolves and to respond to changing laws, we will review and refresh our training.

Additionally, specific staff in Procurement, Quality, Accounts Payable, Global sourcing, Product Development and Legal are required to undergo Supplier Sustainability Code training every two years. This online training module covers key elements of the Supplier Sustainability Code (including modern slavery), the SunRice Group Speak Up program and the expectations and responsibilities of our suppliers and of the SunRice Group. We plan to update our Supplier Sustainability Code over the coming year and will refresh our training accordingly.

During FY2023, the SunRice Board and CMT received refresher training on the the Act. This was conducted in-person and was provided in addition to the online module.



**Collaboration and  
industry engagement**

The SunRice Group has been a participating member of the UNGC and the UN Global Compact Network Australia (**UNGCNA**) since 2018. Our Group Head of Sustainability is a member of the Modern Slavery Community of Practice (**MSCoP**).

The MSCoP meets regularly to provide businesses with a space to learn and discuss opportunities and challenges relating to modern slavery and share leading interventions to improve approaches to modern slavery risk management.





# Grievance mechanisms and remediation

## Approach to remediation

In line with the UNGPs, where we identify that we have caused or contributed to human rights harms, including modern slavery, we are committed to providing for, or cooperating in, effective remediation for affected stakeholders. We also recognise that there may be situations where we are directly linked to human rights harms, including modern slavery. In those situations, we may use our influence to play a role in remediation.

In addition, we are committed to strengthening our grievance mechanisms to support them in being accessible and trusted as outlined in UNGP 31.<sup>30</sup>

## Overview of our grievance mechanisms

### Grievance Policy

It is important that all employees have the opportunity to raise grievances that they may have within the workplace, including in relation to modern slavery or other labour rights issues. The objective of the SunRice Group Grievance Policy is to promote and foster a harmonious working environment by providing a process whereby conflicts and disputes are resolved quickly and amicably and to the satisfaction of all concerned parties.

The Grievance Policy outlines the steps for raising grievances, outlines the resolution process including the possibility of mediation or conciliation and highlights the underpinning principles of confidentiality and accountability.

If an investigation is to be undertaken, an internal investigator or, if deemed appropriate by the SunRice Group, an external investigator will be appointed to conduct the investigation impartially and sensitively. The Grievance Policy also outlines the variety of outcomes that may be achieved including an apology being given, targeted training, changes to working arrangements and/or disciplinary action.

## Speak Up Policy and whistleblower program

### Who?

Speak Up provides an avenue for a range of persons including those who are or have been an employee, officer or director of a member of the SunRice Group, as well as others with a connection to the SunRice Group such as suppliers of goods or services to an entity in the SunRice Group, contractors, consultants and other business partners (including someone who is or has been employed by a supplier), or a relative, spouse or dependent of any of these individuals. This includes workers in our supply chain and community members.

### What?

Reportable conduct can include any potential breach of the law or our key policies including our Code of Conduct, Anti-Bribery and Corruption Policy and our Supplier Sustainability Code. This includes issues related to human rights including labour exploitation and modern slavery.

### How?

A Speak Up report can be made in writing or verbally including to:

- Integrity Officer
- Director or member of the CMT
- Speak Up Hotline (phone, QR code, online) and
- Ambassador (for those working in PNG, Solomon Islands and Vietnam) or General Manager.

### When?

The Speak Up Hotline is administered by NAVEX Global, an independent third party and is available 24 hours a day, seven days a week.

### Key elements

- The Speak Up Policy is available in English, Vietnamese, Arabic and Pidgin
- Confidentiality protected
- Option for anonymous reporting (through the Speak Up Hotline)
- All reports are taken seriously
- Commitment to non-retaliation and reprisals
- Ongoing communication with complainants
- Additional support for complainant (as required)
- External third-party support (as required) and
- Ambassadors to promote the mechanism.

30. The UNGPs set out criteria to ensure operational-level non-judicial grievance mechanisms are effective. This includes that grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.



We seek to raise awareness of our Speak Up whistleblower program with our employees in a number of ways. Information on this whistleblower program is included in the SunRice Group Code of Conduct and is discussed in our induction training sessions. Guidance materials including posters for our grievance channels are displayed in our own facilities and we regularly promote the Hotline in our monthly internal newsletter, *The Roundup*, which is distributed to all staff with email addresses and displayed in lunch rooms at some of our facilities. Materials are also shared with our suppliers to help raise awareness of our Speak Up mechanism with workers in our supply chain.

We monitor the Speak Up reporting channels to oversee that they are fit-for-purpose and that there is awareness of the mechanism amongst our employees and other relevant stakeholders. Training to promote understanding and awareness of Speak Up is conducted both online and face-to-face particularly in jurisdictions where access to the internet and computers is challenging and/or where support in a local language is required. The training provides an overview of relevant SunRice Group policies (including the Anti-Bribery and Corruption Policy), the rights of and the protections for employees and how to make a report.

We have ABC Ambassadors located in PNG, Vietnam and Solomon Islands to promote both the Speak Up mechanism and our Anti-Bribery and Corruption Policy. The Ambassadors also make themselves readily available to employees to provide them with the option of raising issues with a trusted internal representative, in addition to employees being able to use the external Speak Up hotline.

# 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](mailto:ABCReporting@sunrice.com.au)  
 Post: PO Box Q166 QVB, Post Shop, NSW 1230, Australia  
 Call: +61 2 9268 2074

**To report a concern to our independent Speak Up hotline:**  
 Online: [sunrice.ethicspoint.com](http://sunrice.ethicspoint.com)  
 Australia: 1800 953 947  
 US: 833 581 0346  
 Singapore: 800 852 3976  
 PNG: 000 861 271  
 Vietnam: Dial the direct access number for your location: 1 201 0288 or 1 228 0288. Then, dial 833-581-0346 and follow the prompt.

**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.

**ZERO TOLERANCE** **Make a Difference**



*Sandra Cittadini, Head of Talent and Organisation Development and Emmanuel Armand, Head of Group Finance.*

### Speak Up reporting during FY2023

Data on the number and outcomes of Speak Up reports was provided twice a year to the SunRice Board's Finance, Risk and Audit Committee (FRAC) by the Integrity Officer. The information provided to the FRAC includes information related to the key issues and themes arising from the reports and steps taken to ensure anonymity is protected.

We will continue to monitor reports for precursors to human rights related matters, including modern slavery.



# Assessing the effectiveness of our approach

## Ensuring that our modern slavery and broader human rights program is having an impact is critical to us.

Our systems include feedback loops which help us to drive continuous improvement and identify the areas of our program that need to be accelerated or revised. The SSP Steering Committee provides an example of how we implement feedback loops in practice. For example, through this cross-functional group we can incorporate feedback from across the business and make adjustments and improvements. This iterative process enables us to regularly evolve our strategies and strengthen our response to modern slavery risks. The SSP Steering Committee and the SHS Committee of the Board are responsible for monitoring the effectiveness of our program.

We recognise that we still have work to do in outlining our impact in a consistent and measurable way. We understand that having a strong framework in place to assess the effectiveness of our actions helps to build greater accountability, transparency and trust by demonstrating progress to our stakeholders. This will be a growing focus as we advance our modern slavery and broader human rights program.

## Embed robust governance systems for the SunRice Group's operations on human rights including modern slavery

### Key outcomes in FY2023

- Strengthened our governance approach by elevating the SSP Working Group to a Steering Committee.
- Commenced work to update or develop policies in a range of areas including procurement, labour hire engagement and child labour.
- Convened five meetings of the SSP Steering Committee.
- Conducted Board and CMT refresher training on responsibilities under the Act.

### How this helps us to assess effectiveness

Through the SSP, we review key policies and governance frameworks to evaluate their effectiveness and whether they remain fit-for-purpose and reflect our operating environment. This has led to an update of a number of policies and procedures across the SunRice Group during FY2023 and into FY2024.

## Develop and implement a plan for conducting social and ethical audits at SunRice Group sites that prioritises sites based on human rights-related risks associated with our operations

### Key outcomes in FY2023

- Conducted five SMETA audits of AGS sites and our CopRice site at Wangaratta. A total of 12 SMETA audits of SunRice Group sites have been completed to date. This exceeds our target of seven sites with audits by FY2023.

### How this helps us to assess effectiveness

Audits help us to understand whether we have consistent compliance with local legislation and ETI across our operations. Audits also help us to identify opportunities for us to work with business partners to improve policies and practices to address identified non-compliances.

## Minimise the risk of labour rights abuses in our operations and supply chain

### Key outcomes in FY2023

- Conducted a social review of Australian rice growers to strengthen our engagement with rice growers, drive rice growers' understanding of human rights issues and deepen our understanding of the potential human rights risks, including modern slavery risks in our Australian rice supply chain.
- Continued work on the Supplier Mutual Recognition Program. We mapped our Supplier Sustainability Code to various audit programs and are exploring opportunities to apply this.
- Strengthened systems, policies and processes to minimise risks associated with younger workers.
- Focused on the modern slavery risks related to labour hire companies.

### How this helps us to assess effectiveness

As outlined above, audits and social reviews help us to understand whether our approach to managing human rights related risks are being implemented in our operations and whether our expectations of suppliers are being met. Through these processes, we identify opportunities to work with suppliers and business partners to improve policies and practices to address identified non-compliances.

## Build internal capability to identify and remediate issues as they arise

### Key outcomes in FY2023

- Continued rollout of mandatory modern slavery training for employees and targeted training for key business functions on the Supplier Sustainability Code.
- Ambassadors in PNG and Vietnam conducted in-person training on Speak Up.
- Participated in the UNGCNA's Modern Slavery Community of Practice meetings.
- Participated in the UNGCNA's Annual Dialogue on Business and Human Rights.

### How this helps us to assess effectiveness

Providing modern slavery training and targeted training on the Supplier Sustainability Code helps us understand the capacity of our people to identify and address modern slavery risks.

Monitoring reports from Speak Up and other channels enables us to detect patterns, guide due diligence measures and shape policy development.

Hearing about peer practices (including how they respond to challenges) provides an opportunity for learning and helps us identify opportunities to keep improving our approach.

## Foster open and trusted supplier relationships to identify and remediate labour rights issues across our supply chain

### Key outcomes in FY2023

- Through the social review of Australian rice growers, we strengthened our relationship with growers and created an opening for ongoing dialogue beyond formal reviews and meetings.
- We focused on building engagement and dialogue with labour hire companies, ensuring the implementation of appropriate safeguards and prompt escalation of concerns.

### How this helps us to assess effectiveness

Engaging with suppliers and other business partners provides us with feedback on where our approach is working and where we have opportunities to improve.



## Consultation process

**The ongoing development of our Modern Slavery Statement and our modern slavery approach, includes cross-functional consultation with input from key 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. The SSP Steering Committee is central to our approach as it provides a framework for ongoing consultation, engagement and collaboration across the SunRice Group. The consultation and exchange of information not only supported the development of this Statement but the ongoing implementation of the SunRice Group's response to modern slavery.

The development of this Statement was led by the Group Sustainability team with input from various functions across the reporting entities including Corporate Affairs, Group Finance, Global Supply Chain and Manufacturing, Procurement, People and Culture, Legal, International Sourcing, Product Development, Product Quality and Health and Safety. Input was also sought from senior leaders and employees across our owned and controlled entities including AGS, Global Rice, CopRice, Trukai Industries and Riviana Foods (which is also a reporting entity).

This Statement was reviewed and approved by the Group CEO and CMT. The CMT comprises executives from across the SunRice Group who have specific operational responsibility for the reporting entities, controlled entities and business units, including Riviana Foods, Trukai Industries, Global Rice and CopRice. In addition, the Statement was reviewed by the SHS Committee of the Board of Ricergrowers Limited before it was approved by the Board.

# Regulatory disclosure matrix

**This statement was prepared to meet our regulatory disclosure requirements and complements our existing sustainability disclosure found on the SunRice investor website and in Annual Reports.<sup>31</sup> This Statement is made in accordance with the *Australian Modern Slavery Act 2018* and with regard to the requirements of the *UK Modern Slavery Act (2015)*.**

The table below references where within this Statement we address the mandatory criteria for the *Australian Modern Slavery Act 2018* and the requirements under the *UK Modern Slavery Act 2015*.

	Australian Modern Slavery Act Mandatory criteria	UK Modern Slavery Act Recommended reporting criteria	Disclosure reference
1	<b>Mandatory criteria 1:</b> Identify the reporting entity.		About this Statement (page 2)
2	<b>Mandatory criteria 2:</b> Describe the structure, operations and supply chains of the reporting entity.	Organisation's structure, its business and its supply chains.	Our structure, operations and supply chain (page 7)
3	<b>Mandatory criteria 3:</b> Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls.	Parts of its business and supply chains where there is a risk of slavery and human trafficking taking place and the steps it has taken to assess and manage that risk.	Identifying and understanding our modern slavery risks (page 12)
4	<b>Mandatory criteria 4:</b> Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Policies in relation to slavery and human trafficking.  Due diligence processes in relation to slavery and human trafficking in its business and supply chains.  Training on slavery and human trafficking available to staff.	Assessing and addressing our modern slavery risks (page 17)  Grievance mechanisms and remediation (page 22)
5	<b>Mandatory criteria 5:</b> Describe how the reporting entity assesses the effectiveness of such actions.	Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Assessing the effectiveness of our approach (page 24)
6	<b>Mandatory criteria 6:</b> Describe the process of consultation with any entities that the reporting entity owns or controls.		Consultation process (page 25)
7	<b>Mandatory criteria 7:</b> Any other information that the reporting entity considers relevant.		Appendix 1: Our brands (page 27)  Appendix 2: SunRice Group entities (page 28)

31. In FY2022 we produced a Sustainability Snapshot. In FY2023 our Sustainability Report was integrated into the FY2023 Annual Report.



# Appendix 1: Our major brands



## Appendix 2:

### SunRice Group entities

<b>Name of entity<sup>32</sup></b>	<b>Country of Incorporation</b>	<b>Principal activities</b>	<b>SunRice Group interest in the entity in FY2023 (%)</b>
<b>Ricegrowers Limited</b>	<b>Australia</b>	<b>Ultimate parent entity</b>	-
<b>Riviana Foods Pty Ltd<sup>33</sup></b>	<b>Australia</b>	<b>Importation / manufacturing / distribution of food products</b>	<b>100</b>
Australian Grain Storage Pty Ltd*	Australia	Grain storage assets	100
Rice Research Australia Pty Ltd	Australia	Research into rice growing	100
Roza's Gourmet Pty Ltd	Australia	Manufacturing / distribution of food products	100
KJ&Co Brands Pty Ltd	Australia	Importation / distribution of food products	100
SunRice Australia Pty Ltd	Australia	No current activities	100
SunRice Fund Limited	Australia	No current activities	100
SunRice Trading Pty Ltd	Australia	No current activities	100
Pryde's Tuckerbag Pty Ltd	Australia	Holding company	100
Pryde's Easifeed Pty Ltd	Australia	Manufacturing / distribution of animal food products	100
Pryde's Easifeed NZ Limited	New Zealand	Distribution of animal food products	100
Ricegrowers New Zealand Ltd	New Zealand	Distribution of rice and other food and animal nutrition products	100
Aqaba Processing Company Ltd	Jordan	Rice packing / storage	80
Rice Industries Limited	PNG	Property	66.23
Trukai (Wholesale) Limited	PNG	Distribution of rice	66.23
Trukai Industries Limited	PNG	Processing and distribution of rice	66.23
Ricegrowers Singapore Pte Ltd	Singapore	Procurement and trading of rice and other food products	100
Ricegrowers Limited Japan	Japan	No current activities	99
Solomons Rice Company Limited	Solomon Islands	Distribution of rice	100
Ricegrowers Middle East DMCC	UAE	Distribution of rice and other food products	100
SunFoods LLC	USA	Processing and distribution of rice	100
Sunshine Rice, Inc	USA	Holding company	100
Ricegrowers Vietnam Company Limited	Vietnam	Processing and distribution of rice	100
SunRice Trading (Shanghai) Co Ltd	China	No current activities	100

32. The line items in bold are reporting entities under the Act.

33. Entities part of a Deed of Cross Guarantee that are relieved under the ASIC Corporations (Wholly-owned Companies) Instrument 2016/785 from preparing a separate financial report (see note 5c) of the Annual Report.





# Modern Slavery Statement 2023

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#### **Riviana Foods**

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[sunrice.com.au/our-modern-slavery-statement/](http://sunrice.com.au/our-modern-slavery-statement/)