



PREMIER FRESH AUSTRALIA
Modern Slavery Statement

1. Introduction

PREMIER Fresh Australia (PREMIER) is committed to the practice of good corporate governance and adhering to the highest ethical standards, complying with the applicable legal obligations including and without limitation, the Modern Slavery Act 2018 (Aust) (the Act).

We will not tolerate any forms of coercion, deception, threat, or worker exploitation that undermine the individual and collective freedom of the workforce within our business and supply chain.

PREMIER has prepared a Modern Slavery Statement for the reporting period, calendar year ending 31 December 2024 and submitted within 6 months after the end of the reporting period, in accordance with sections 13 and 16 of the Act. This Statement is for the purpose of outlining our commitment and the approach taken to ensure we are taking reasonable steps to demonstrate further maturing of operating standards and processes to minimise the risk of modern slavery in our business operations and supply chain.

2. Reporting Entity

PREMIER is a privately owned enterprise, established from the 2016 merger of the LaManna Group and PREMIER Fruits Group. As of 1st July 2024, Premier Fresh Australia is an 100% privately and Australian owned company. The head office location is 103-107 Hyde St, Footscray, Victoria 3011 Australia.

PREMIER's Modern Slavery Statement is applicable to the PREMIER Fresh Australia (ABN: 87 004 843 556) and its wholly owned subsidiaries.

Throughout the reporting period, consultation on modern slavery risks and controls occurred with these entities through group-level governance forums, shared procurement oversight, and risk management reporting. Policies, supplier due diligence processes, labour hire auditing, and corrective actions are applied consistently across all controlled entities to ensure a unified approach to ethical sourcing and modern slavery risk management.

3. About Us (Operations)

PREMIER is one of Australia's largest, and privately owned fresh produce supply chain companies, providing both its domestic and overseas customers with a single source of supply across a diverse range of fruit and vegetable categories.

PREMIER has a vertically integrated production capacity across growing, marketing and supply, together with an unrivalled partner grower network which spans all Australian states and includes open field growing as well as protected cropping.

Our farming and distribution operations, coupled with major supermarket and independent retailer relationships, ensure we reach Australian households with good quality, healthy, fresh produce.

PREMIER's sales and distribution operations include climate-controlled distribution services, packing and advanced ripening facilities, and central market Trading operations across all major Australian cities.

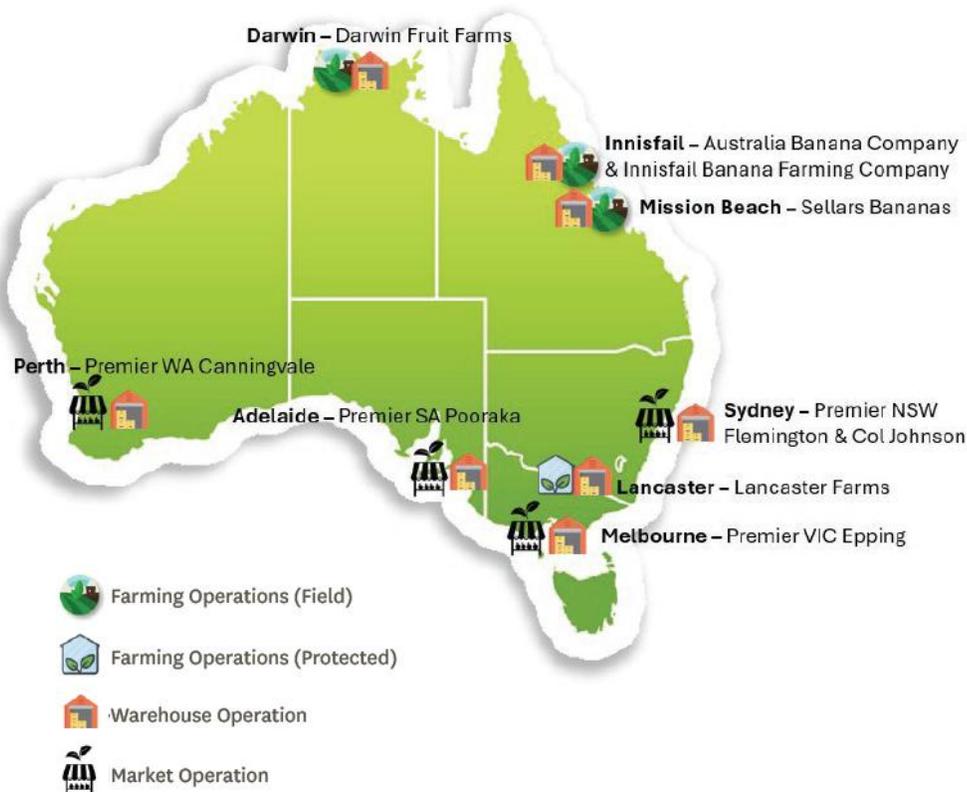
Employees

PREMIER employ over 460 people directly and through third party labour hire providers across our national group of horticultural farming operations and wholesale distribution of fresh produce. In addition, we also source product from our partner growers, who provide employment for up to several thousand people.

PREMIER's workforce encounters fluctuations primarily driven by the seasonality of production. During peak harvest seasons, the demand for labour is significantly higher, contributing to a higher workforce total.

PREMIER's direct workforce is covered by an applicable Modern Award, or salaried agreement. Our internal Payroll & Compliance department, have a systematic verification and audit program to ensure ongoing compliance to National Employment Standards (NES) and Modern Award conditions. PREMIER have terms of agreement with all labour hire providers, stipulating the applicable Modern Award workers must be covered under.

In the 2024 reporting period, our employees included people from over 50 different nationalities.



4. Understanding our Supply Chain and Risks

PREMIER's supply chain includes the production, sourcing, and distribution of fresh produce from farm to major and independent retailers nationwide and international export of Australian fresh produce via freight forwarding.

Our major suppliers of products and services are almost all Australian, with less than 5% being international supply chains.

PREMIER recognises that due to the to the number of stakeholders operating across our supply chain, that there is potential for modern slavery to occur. Common modern slavery risks identified within our operational and sourcing footprint, include;

- Forced or bonded labour
- Unethical recruitment
- Underpayment of wages
- Excessive working hours
- Unsafe working environment

The horticulture industry has a significant reliance on foreign workers, majority employed temporary or casually undertaking seasonal labour duties on farm. The cohort of foreign workers may be on temporary visas and have limited knowledge regarding employment conditions and human rights.

Partner Growers and Suppliers

PREMIER sources produce from partner growers spanning all Australian states, in turn causing a higher risk of modern slavery. We have an established Approved Supplier Policy and Program (QTPP0001 Approved Supplier Policy) which requires suppliers to acknowledge compliance with PREMIER's ethical sourcing practices. The program includes support mechanisms and tools in which we provide our grower partners to ensure they meet ethical standards and improve in identified areas of risk. The plan has been updated to include specific reference to Modern Slavery requirements and is being distributed to new and all existing suppliers. PREMIER has a zero tolerance for all forms of Modern Slavery, this is communicated to all Approved Suppliers and is continuing to develop to incorporate all suppliers, contractors, and business partners.

Transportation - road, air, and sea freight

PREMIER utilises a wide range of transportation for product both domestically, interstate, intrastate and internationally. All transportation service providers have received communication regarding the PREMIER Modern Slavery Policy and Statement, outlining the expectations required of all businesses in this regard.

Packaging

PREMIER engages with several packaging manufacturers and suppliers to ensure product meets customer expectations and requirements. All Packaging manufacturers and suppliers have received communication regarding the PREMIER Modern Slavery & Ethical Sourcing Policy (CGPP0002 Modern Slavery & Ethical Sourcing policy) and Modern Slavery Statement (CGPP0001_Modern Slavery Statement), outlining the expectations required of all businesses in this regard.

Labour Hire & other third-party services

PREMIER has established an Approved Labour Hire Program and utilises 12 preferred labour hire providers to place temporary and seasonal workers. In addition, PREMIER utilises several other services including maintenance, safety provision, cleaning, and security.

5. Risk Assessment and Mitigation

PREMIER is committed to and takes a proactive approach to preventing Modern Slavery Risk from our supply chain. PREMIER's management of Modern Slavery risk, in our operation and supply chain, is guided by our CGPP0002 Modern Slavery & Ethical Sourcing policy.

Our risk-based due diligence process, constructed with reference to our Ethical Sourcing and Modern Slavery Policy, is part of our broader Approved Supplier Program and is designed to identify and assess a range of potential risks in the supply chain, including Modern Slavery.

PREMIER encourages an open and honest approach in setting out the actions we have completed and when considering the effectiveness of our efforts. During this reporting period, PREMIER has continued to advance our controls and processes to assess and address modern slavery related risks within our operations and supply chain.

We have developed and implemented an action plan with appropriate measures to prevent, mitigate, address, or remediate modern slavery related risks. The purpose of our action plan is to set achievable standards and to encourage suppliers to identify areas of risk and concern, while also committing to continuous improvement. The key areas of focus are set out below.



Our progress against our 2024 targets is outlined in table below.

Target	Outcome
Advanced and General Modern Slavery Awareness modules made available in the Learning Management System.	Modern slavery and Whistleblower modules created and available.
All PREMIER supervisors and managers to complete Modern Slavery Advanced Awareness training available on the Learning Management System	Modules released to all key managers with a completion rate of 30%. Training participation and completion will be extended into the 2025 reporting period.
General Modern Slavery Awareness training module made available to entire PREMIER workforce and supply partners to complete.	To be made available to supply partners in 2025 reporting period.
Continue to conduct audits on partner grower and suppliers.	80 partners growers/third party providers completed social audit.
Continue to work with supply partners that are registered with SEDEX or Fair Farms.	Increase to 65% of partner growers registered on SEDEX or Fair Farms.

Approved Supplier Program

- 100% of PREMIER and controlled entities are Sedex / Fair Farms members with a third party SMETA or Fair Farms audit completed.
- 45 partner growers have undertaken ethical audits (SEDEX/Fair Farms) this year.
- Working with selected Suppliers within the Approved Supplier Program to audit their business practices to strengthen their internal policies and procedures; including, but not limited to, workers' labour and payroll conditions.
- Provision of support mechanisms and tools to enhance suppliers' improvement in areas of non-conformance, to ensure 100% to ethical standards.
- The ongoing and enhanced review and update of approved supplier agreements to include a Modern Slavery clause, followed by distribution of the revised approved supplier agreements.

We have assessed our top 100 supplier Modern Slavery positions. We examined their statutory reporting obligations concerning the Modern Slavery Act, in compliance with SEDEX auditing and the existence of internal policies relating to Human Rights and Ethical Sourcing. The annual review process with our Tier 1 and 2 (direct and indirect) suppliers now has a requirement to include discussions relating to Modern Slavery, ensuring Modern Slavery Risks are front of mind for PREMIER and our partners. (Refer to Third Party Supplier Auditing, Page 3).

Labour Hire Providers

Internal audits of our third-party labour suppliers are conducted on a regular basis. This includes auditing compliance against PREMIER's Labour Hire Service Agreement and all relevant state and federal legislation. Labour Hire Service Agreements make explicit PREMIER's expectations with respect to the conduct and legal compliance of such suppliers, including explicit reference to PREMIER's Ethical Sourcing and Modern Slavery Policy.

As part of our commitment to continuously addressing and reducing modern slavery risks in our own operations and that of our suppliers, PREMIER will periodically review and further develop our internal control and risk management systems to ensure we properly monitor and where identified address and remediate any modern slavery risks or activity.

In the 2024 reporting period, PREMIER updated the labour hire worker registration process, to include the requirement of worker nationality and VEVO Check document as part of the employee registration of details & onboarding process.

As part of our ongoing commitment to ensure ethical compliance across our preferred labour hire providers, we will focus on achieving registration of our providers to the SEDEX scheme. Maintaining the third-party scheme with SEDEX will require our labour hire providers to complete an annual self-assessment.

Pacific Island Workforce

PREMIER source labour through the Pacific Australia Labour Mobility Scheme (PALM) to meet our labour demands on farm.

The PALM scheme has become an integral part of our labour strategy. PREMIER's wholly owned Darwin Fruit Farms (DFF) is an approved employer under the scheme, ensuring a continued reliable workforce. In the 2024 reporting period, there were 29 direct placements of Seasonal Workers at our DFF operations.

Since the implementation of the new PALM Deed and accompanying guidelines, DFF has maintained an impeccable record, reporting no contraventions of the deed.

PREMIER continue to use Labour Hire Providers to supply the Seasonal Worker workforce across our wholly owned farms in Far North Queensland. The use of Labour Hire Providers increases the risk of modern slavery violations, however, continues to provide a consistent workforce throughout the year. To mitigate the risk of unethical practices, these providers participate in the labour hire audit program conducted by PREMIER.

Policy Framework

PREMIER's policies, procedures and programs listed below reflect PREMIER's values, standards, expectations, and commitment to compliance with Modern Slavery from our own team and our suppliers and are based on national and internationally recognised codes of practice, including Ethical Trade Initiative (ETI) Base Code and the Universal Declaration of Human Rights.

- CGPP0003 Anti Bribery & Corruption Policy
- CGPP0002 Modern Slavery & Ethical Sourcing Policy

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- CGPP0004 Whistleblower Policy
 - CGPP0008 Terms of Trade (Merchant)
 - CGPP0006 Privacy Policy - External
 - QTPP0005 Approved Supplier Policy
 - HRPP0005 Equal Employment: Discrimination, Harassment and Bullying Policy
 - HRPP0028 Workplace Grievance & Complaints Handling Policy
 - HSWPP0001 Health, Safety & Wellbeing Policy
 - HRPP0029 Wages & Employment Compliance Policy

In addition to the company policies, PREMIER has a range of initiatives that deliver the requirements of the policies and aim to inform, guide, and support the workforce. These include:

Third Party Supplier Auditing

All major Australian retailers require all direct and indirect suppliers (Tier 1 and Tier 2) to be ethically responsible by meeting regulatory requirements with regards to employee and labour hire conditions and management. All PREMIER packing sites and Tier 2 supplier sites must be registered on either of the SEDEX (Supplier Ethical Data Exchange) or Fair Farms responsible sourcing schemes.

As a Tier 1 supplier, PREMIER is required to complete frequent SEDEX audits at all packing sites. PREMIER's Quality and Technical (QT) team provide support to Tier 2 suppliers to register and complete ethical requirements, and regularly report to major customers to ensure that PREMIER and our suppliers meet all requirements.

In the 2024 reporting period, PREMIER undertook 6 audits across the national group, including 3 SEDEX audits and 3 Fair Farms audits.

From the 3 SEDEX audits fulfilled, findings were represented across the following areas:

- Award/Wages including:
 - end date of pay period not shown on Labour Hire Provider pay slips.
 - misclassification of worker as per applicable award (day worker vs shift worker).
 - labour hire provider employment contracts excluding clause confirming the variation to award.

From the 3 Fair Farms audits complete, findings were represented across the following areas:

- Workplace Health & Safety – inadequate recording of safety systems requirements including:
 - emergency evacuation & fire records not according to AS3745-2010.
- Workplace Health & Safety – Risk Management including:
 - Deactivated safety bell still accessible in the cool room.
- Workplace Health & Safety – Chemical storage non-compliance:
 - inadequate bunding of chemical drums.

All findings were rectified well within the required timeframe, maintaining an excellent record across all sites that undertook the audits.

Employee Assistance Program

PREMIER engaged an Employee Assistance Program (EAP) service provider, MindFit, providing PREMIER's workforce an enhanced mental health support service. Access is available to all employees and eligible immediate family members with a range of services and support. It is a confidential and 24-hour service, with support available for personal and work-related issues including performance, dealing with grief, and stress management.

Human Resources Support & Contact Officers

PREMIER's Business Support Human Resources (HR) team is the first point of contact for all general HR queries and support, hrsupport@PREMIERfresh.com.au. The team regularly support and advise managers on a range of employee development, performance management, employee grievance, employee relations and safety and wellbeing matters. Working with the local Health, Safety & Wellbeing Committees, the HR team appoint and train contact officers, who are positioned to provide impartial, unbiased support to all employees and workers, as an alternative support to the management. The national cohort of Contact Officers completed their annual training in October 2021, and each team informed of the appointed Contact Officers at the site.

Grievance Reporting Mechanisms

PREMIER provide robust grievance procedures to address individual concerns, including those related to ethical, work health and safety, operational or other issues. We recognise that providing clear accessible and effective mechanisms is essential to fostering a safe and respectful workplace where grievances can be resolved fairly and promptly. Our national workforce is regularly consulted on our grievance procedure and subsequent reporting mechanisms.

Employees are encouraged to raise concerns at the earliest opportunity through informal channels, including approaching their direct manager or supervisor to seek advice, guidance, and mediation.

For more serious concerns or where informal methods are not effective, the following grievance channels can be accessed by workers:

1. Anonymous Reporting Line

Employees, contractors and third parties can report concerns anonymously through our dedicated 'Grievance Reporting' QR code or the 'Report a Safety Issue' QR code displayed across all sites in common areas.

The anonymous reporting tools are managed by the internal Human Resources team. In cases where a grievance necessitates an impartial and unbiased investigation, an independent third-party provider may be engaged to conduct the inquiry.

2. HR Support Line - Formal Grievance Lodgement

Formal grievances are submitted via the HR Support line – HRSupport@premierfresh.com.au . A representative from the HR team will acknowledge receipt, investigate the matter, and provide a plan for resolution.

3. Continuous Improvement

We regularly review our grievance procedure to ensure tools remain accessible, effective, and aligned with best practices. Feedback from employees and stakeholders is welcomed as part of our commitment to continuous improvement.

Wages and Employee Conditions Hotline

The PREMIER Payroll team reviews all wages arrangements as part of the annual Wages Compliance Reporting at the end of each financial year, to ensure compliance against minimum wage requirements across the company's various jurisdictions. These processes are outlined in PREMIER's HRPP0023 Wages Compliance Policy.

All PREMIER workers have access to a Wages and Employee Conditions Hotline displayed onsite and via the national payroll team. All enquiries are ticketed with documented confirmation that the query has been resolved and closed out.

Training & Consultation

PREMIER'S training & consultation framework is significant in ensuring our workforce acknowledge and understand modern slavery.

Learning Management System

In the 2024 reporting period PREMIER continued to build our course library in the Learning Management System, EdApp by Safety Culture, to enhance our training & consultation capabilities to address key areas in Human Resources, Work Health and Safety (WHS) , Corporate Governance and Quality.

The platform has a suite of modules including Equality Employment Opportunity; Sexual Harassment in the Workplace; Bullying & Harassment- appropriate workplace behaviour; Grievance reporting and WHS related content.

Work Group Meetings

Across our operations Work Group Meetings (WGM's) are a regular tool utilised to provide specific information to the workforce regarding several areas of compliance, including WHS and Modern Slavery. The WGM's are delivered by site managers or supervisors and are made readily available on the PREMIER intranet. Sites will keep record of the WGM's that are acknowledged and signed off by participating workers.

Other communication tools

PREMIER deliver site inductions and re-inductions, reiterating key information to new and existing workers including components of Moderns Slavery.

7. Monitoring & Reporting

Supplier Survey

As part of our national supply chain, all suppliers were asked to complete a questionnaire related to their management and prevention of modern slavery within their operations and supply relationships. PREMIER's National Quality and Technical team and Human Resources team assess all suppliers for modern slavery risk on the basis of key risk factors and questionnaire responses.

The supplier survey includes collection of the following information:

- Suppliers contact details.
- To what extent has Modern Slavery risk been addressed by the business?
- Do employees have written employment agreements?
- Are Labour Hire Providers utilised?
- Name and license number of Labour Hire Providers where applicable and utilised.

The survey is in addition to any auditing currently conducted with Labour Hire Providers by the PREMIER Human Resources team.

In the 2025 reporting period we will resend surveys out to our supplier network and record responses appropriately for trending purposes. This will be an ongoing annual initiative.

Woolworths Worker Voice Program Pilot

PREMIER actively collaborate with our supply chain partners to identify and address potential risks and ensure fair and transparent practices.

In 2024, we were one of 17 suppliers who participated in the Woolworths Worker Voice Pilot Program, and initiative designed to empower workers and provide a platform to raise concerns that may not surface during routine audits. This program facilitated anonymous feedback on topics including recruitment process, wages, wellbeing, and health and safety.

Labour Hire Audits

PREMIER continues to use consistent labour hire providers nationally across all sites. Our preferred labour hire providers are required to participate in an internal audit pre-engagement and annually post-engagement. During the reporting period, all providers were required to undertake an internal audit ensuring compliance with PREMIER's Labour Hire Service Agreement and with all state and federal legislation. Further investigations are undertaken should issues be discovered, followed by appropriate remediation. Service Agreements issued with labour hire providers include reference to PREMIER's expectations for such providers, including reference to Ethical Trade and Modern Slavery.

SEDEX Membership

PREMIER is an AB member of SEDEX, allowing us to have greater visibility of compliance across customers and suppliers. This also allowed for a heightened level of risk assessment across the supply base, considering answers to the self-assessment questionnaire and non-conformances raised during audits.

Fair Farms Membership

In the 2024 reporting period we became a member of Fair Farms for auditing purposes across our farming operations including Darwin Fruit Farms (DFF); Australian Banana Company; and Lancaster Farming.

Site visits

As part of our Approved Supplier Program, PREMIER conducts site visits of preferred partner growers which allows greater transparency and visibility of conduct occurring on site. It allows further identification and assessment of areas that may be overlooked through desktop audits.

Assistance and support are provided to sites who have undertaken or are preparing to undertake a third party ethical audit, namely Sedex SMETA or Fair Farms.

8. Measuring effectiveness

PREMIER has completed an assessment of modern slavery risk as part of PREMIER's Approved Supplier Program, and we will continue with this approach to expand our level of understanding of the nature of risks pertaining to modern slavery within our operations and across our supply chain.

As part of PREMIER's usual continuous improvement process and for compliance with the Modern Slavery Act 2018 (Aust), the scope of PREMIER's current internal controls and risk management systems will extend to profile the risk and management of our supply chain partners as it relates to modern slavery risk, and to deliver greater oversight of the effectiveness of PREMIER's risk management systems.

Effectiveness of the initiatives outlined in this statement is monitored regularly and assessed through the following processes.

Review of Policies and Procedures

PREMIER have a schedule of review for all Corporate Governance, HR and WHS policies, outlining the required frequency of review. In addition, policies are monitored throughout the year, to ensure they're reviewed upon legislation requirements or updates.

Risk Assessment

- Internal audits
- Third-Party audits

Grievance Procedures

- Disclosure Coordinator
- Grievance Procedure
- HR Support hotline

Monitoring

- Supplier/Grower site visits
- Program of training and consultation

Consultation with supply chain partners

We collaborate with a range of supply chain and/or industry partners to foster shared learning, enhance our understanding of modern slavery within our industry, and work collectively to drive continuous improvement in addressing these issues. Examples of organisations we have collaborated with include:

- a) Woolworths: one of 17 participants in the Woolworths Worker Voice Program Pilot.

- b) Coles Group: participated in a review of the Coles Grievance Mechanism Stopline, a program that is available to all workers in both the Coles operations and the wider supply chain. A representative from the Coles Ethical team interviewed workers at our Lancaster Farms site to obtain feedback regarding their Grievance Mechanism to ultimately improve the effectiveness of the tool.
- c) Australia Fresh Produce Alliance: The AFPA consists of Australia's major fresh produce growers and suppliers. As a key member of the AFPA, Premier contribute to the discussion and outcomes of issues involving the growing and supply of fresh produce. We actively participate in the HR Reference Group facilitated by AFPA, where industry professionals come together to discuss workforce industry challenges including employment conditions, awards, immigration, third party auditing. This collaboration allows us to share insights, address common challenges, and contribute to shaping best practices across the industry.

9. Continuous improvement:

As part of our ongoing review of our action plan, our priorities for the 2025 reporting period include.

- a) Ensure 100% completion of the Advanced and General Modern Slavery Awareness modules made available in the Learning Management System.
- b) Ensure 100% completion of all PREMIER supervisors and managers to complete Modern Slavery Advanced Awareness training available on the Learning Management System.
- c) Improving grievance reporting processes including consideration of an independently managed grievance reporting line.
- d) Continue to conduct audits on partner grower and suppliers.
- e) Complete a review of all HPA agreements to include Modern Slavery provisions.
- f) Issue updated HPA agreements with inclusion of modern slavery provision including our statement & policy.
- g) Continue to work with supply partners that are registered with SEDEX or Fair Farms.
- h) Build on current systems and processes to effectively measure our actions.

10. Consultation and Approval

This Modern Slavery Statement was prepared in consultation with PREMIER's wholly owned and controlled entities. Group wide consultation occurs through shared policy frameworks, supplier governance programs and labour hire compliance oversight, ensuring consistent risk management across all business operations under common control.

PREMIER's Group CEO and Audit and Risk Committee retain oversight of PREMIER's Ethical Sourcing and Modern Slavery Policy and mandate that all stakeholders throughout the Group understand and maintain awareness of the Policy, accessed on PREMIER's Intranet and shared file storage system, and communicated through the annual training program as implemented by PREMIER's Human Resources team.

The statement was formally approved by the Premier Fresh Australia Board of Directors on December 28th 2024, being the principal governing body of the reporting entity, in accordance with Section 13(2) of the Modern Slavery Act 2018 (Cth). Signed by responsible member:

Anthony Di Pietro
Group Chief Executive Officer
28th December 2024.

