



MODERN SLAVERY STATEMENT
2022



Introduction

This Modern Slavery Statement is made on behalf of Tivoli Investments Pty Ltd and all its Group entities, namely:

- Inguz Harvest Pty Ltd
- Harvest FreshCuts Pty Ltd
- Vegco Pty Ltd

Collectively referred to in this Statement as **“One Harvest”**.

This Statement is made for the purposes of the Modern Slavery Act 2018 (Cth) and is the second Statement published by One Harvest.

One Harvest is committed to ensuring sustainable operations and supply chain that respects human rights. One Harvest recognises the importance of building and maintaining strong partnerships with our Suppliers. Suppliers are an integral part of our business, helping us ensure that not only through our products but also through our day-to-day operations, we are supporting a better life for all.



Our Structure, Operations and Supply Chain



One Harvest is a family-owned Australian company that grow, process and supply our value-add produce to supermarkets and green grocers nationally. Our operations include four facilities and employ more than 1,000 people. Our product range includes prepacked salads & vegetables and fresh-cooked beetroot & potatoes.

One Harvest has a wide range of suppliers providing a breadth of products & services including but not limited to agricultural raw materials, packaging, ingredients, logistics, machinery, maintenance, training, consulting, legal and financial services. These suppliers range from family-owned, small to medium sized businesses, to international organisations. Most of our suppliers are located in Australia, particularly our large network of growers.

Our website (www.oneharvest.com.au) provides further insights into our operations, suppliers and our commitment to “help people live better lives.”

Assessing and Addressing Modern Slavery Risks

Modern slavery refers to a range of serious forms of exploitation including forced labour, debt bondage, human trafficking and child labour.

One Harvest is collaborating with its suppliers, customers and other relevant stakeholders to promote ethical practices and assist in minimising the risks of modern slavery within its operations and supply chain.

One Harvest has a risk assessment framework which evaluates all current and new suppliers against the following four key modern slavery risk factors to determine their overall risk rating:

-  Vulnerable populations
-  Business models structured around high-risk work practices
-  High-risk product and service categories, often sector specific, and
-  High-risk geographies.

In terms of risk assessments performed on One Harvest's supply chain most suppliers have been assessed as having a low overall risk rating.

Some suppliers were identified that have a higher risk of exposure to modern slavery due to the jurisdictions and industries in which they operate. In particular, a number of suppliers which operate in the agricultural industry, which is considered to have a higher inherent risk of modern slavery.

Due to the challenges faced this year within the labour market, it has seen an increased reliance on labour hire providers. To counteract the increased inherent risks in relation to these labour services, One Harvest has ensured appropriate modern slavery clauses have been included in all labour hire agreements and additional due diligence and compliance reviews completed. Further to this, most of our labour hire providers hold current Sedex membership.

In terms of mitigating, any modern slavery risks in relation to One Harvest's operations, in particular for our workforce, appropriate labour practices are enforced through the following policies:

- One Harvest Code of Conduct;
- Equal Employment Opportunity Policy;
- Discrimination, Workplace Harassment and Sexual Harassment Policy;
- One Harvest Reimbursement Policy;
- One Harvest Annual Leave and LSL Policy; and
- One Harvest Whistle-blower Policy.

Further to these, our internal People & Capability Team facilitates recruitment either directly or with the use of reputable recruitment agencies. All employees go through a structured on-boarding process.

Our Approach

Accountability for Modern Slavery Risks & Issues

One Harvest has an Ethical Committee which is chaired by the Head of Risk & Compliance. This Committee ensures compliance with the Act and address identified modern slavery risks and issues. The committee are responsible for the continuous improvement and review of the supply chain risk assessment framework, review of modern slavery questionnaires completed by suppliers and providing quarterly updates to the One Harvest Board's Audit & Finance Risk Committee.

Supplier Engagement & Management

A structured supplier onboarding process ensures that the appropriate due diligence reviews and risk assessments are performed prior to engaging a new supplier. Staff who initiate and review relationships with third parties are provided with training to apply the supply chain risk assessment process.

All existing and new suppliers are to comply with contractual obligations relating to modern slavery, as well as the obligations set out in our Supplier Code of Conduct.

Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. If a supplier identifies any occurrence of, or material risk of modern slavery in their supply chains or operations, they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify One Harvest as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.



Incorporating Modern Slavery into Policies

One Harvest have a Modern Slavery Policy which has been communicated to all staff and a Supplier Code of Conduct which has been distributed to the Groups' supplier base. When existing policies undergo review or new policies are under development, policy owners are required to identify modern slavery commitments and protections to be incorporated.

Communications, Engagement and Training

All relevant staff, including the Board, Executive Team and those responsible with engaging suppliers are provided adequate training to enhance their understanding of the causes and impact of modern slavery, the Modern Slavery Policy and our approach to limiting the risk of modern slavery within our supply chains and operations.

Reporting Unethical or Unlawful Conduct

Anyone with concerns about non-compliance, illegal or unethical activities relating to modern slavery are encouraged to report these concerns by making use of the One Harvest Whistle-blower Hotline, with modern slavery compliance built into the Whistle-blower Policy.

Progress Made During 2022

Sedex & Fair Farms Transition

We continue to engage with our supplier base as we work to transition the majority of our suppliers onto the Sedex platform and Fair Farms for our growers. The main attention during the year was focused on the higher risk supplier categories being, labour hire, growers, non-produce and logistics.

Summary of status as at the writing of this statement was as follows:

Supply Chain Category	% Active Sedex Membership
Labour Hire	60%
Logistics	50%
Non-Produce	60%
Growers	33%



Sustainability Focus & Targets

One Harvest formed a Sustainability Council to focus on the key pillars of the business's Sustainability Framework. One of the goals within the pillars is to ensure that all ingredients are sustainably and ethically sourced. Further to this is an underlying commitment to ensure that the activities of our operations and those of our suppliers do not directly or indirectly violate human rights.

Performance against these sustainability targets is reviewed monthly with metrics relating to the suppliers' transition over to an ethical sourcing framework (Sedex or Fair Farms).

Modern Slavery Awareness Training

Modern slavery awareness training was rolled out to all employees including labour hire via our online HRIS platform. One Harvest is invested in making all our team members aware of modern slavery and what they can do to identify, report and prevent such risks or non-compliance within our operations and those of our suppliers.

Assessing the Effectiveness of One Harvest's Actions

As part of our Risk and Compliance processes, the Ethical Committee has continued to review and update, where necessary, any controls, processes and policies that will assist in mitigating modern slavery related risks.

The often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report, however One Harvest is committed to working with suppliers to remediate any breaches of our Modern Slavery Policy or Supplier Code of Conduct.

We have engaged with multiple suppliers to work together to remove modern slavery risks from both party's supply chains and commenced further transparency in governance and controls through the creation of a trading relationship in the Sedex platform.

Improvements in the supplier onboarding process have been implemented to review potential risks up front and to engage in discussions and consultation around ethical sourcing processes and policies.

Instances of Non-Compliance Identified

During FY2022 four instances of non-compliance were identified through the Ethical Committee's due diligence reviews and Sedex audits. These consisted of the following:

- Two instances were identified where labour hire employees voiced concerns around their deductions and lack of understanding on particular employment contract terms;
- Two instances of labour hire employee contract compliance issues.

The above non-compliance matters were discussed with the relevant provider and contract issues corrected. Further education and communication were provided to the affected employees, as well as a full review performed on the pay rates for the employees provided by the relevant labour hire providers. Any errors identified were corrected and any outstanding entitlements paid over to the affected employees.

Through the process the relevant labour hire providers were found to be very open and transparent in working to ensure no ongoing risk or compliance issues for both parties.

As a result of these non-compliance findings the Group's labour hire management policy and process has been reviewed and updated to ensure more thorough and robust controls are in place to identify any potential non-compliance linked to labour hire providers, including, but not limited to, quarterly reviews/audits of labour hire employees' contracts, payslips and right to work documentation.

Our Focus for 2023

One Harvest is committed to the continuous improvement in our approach and maturity around addressing modern slavery risks within our operations and supply chains. Our focus in the coming year will be on the following:

Ethical Trade Membership/Certification

Continue to support our suppliers in transitioning over to an ethical trade membership/certification being Sedex or Fair Farms. Further to this, we will be engaging with our suppliers to ensure value is added in their operations through the benefits of these memberships, rather than a pure "tick box" compliance mentality.



Supplier Ethical Trade Audit Framework

Develop our supplier audit framework policy and processes, leveraging on the third-party frameworks, Sedex and Fair Farms.

Education & Training

Continue to train and develop our people to have a better understanding of modern slavery risks, to help identify potential risks within our operations and when interacting with our supply chain. Leveraging on our partnerships with Sedex and Fair Farms to train applicable staff on using these frameworks to perform more detailed due diligence and risk assessments and to also help support our supply chain elevate their maturity in relation to the management of modern slavery risks.

Process of Consultation

All entities within the One Harvest Group operate under the direction and governance of the One Harvest Board and share the same executive management team.

The Board's Audit & Finance Risk Committee retain oversight of the Group's management of its modern slavery risks through the Committee's oversight.

This Statement was approved by the Board of Directors of One Harvest.

A handwritten signature in black ink, appearing to be "Luke Mountford".

Mr Luke Mountford
Chairman

Date: 16 December 2022