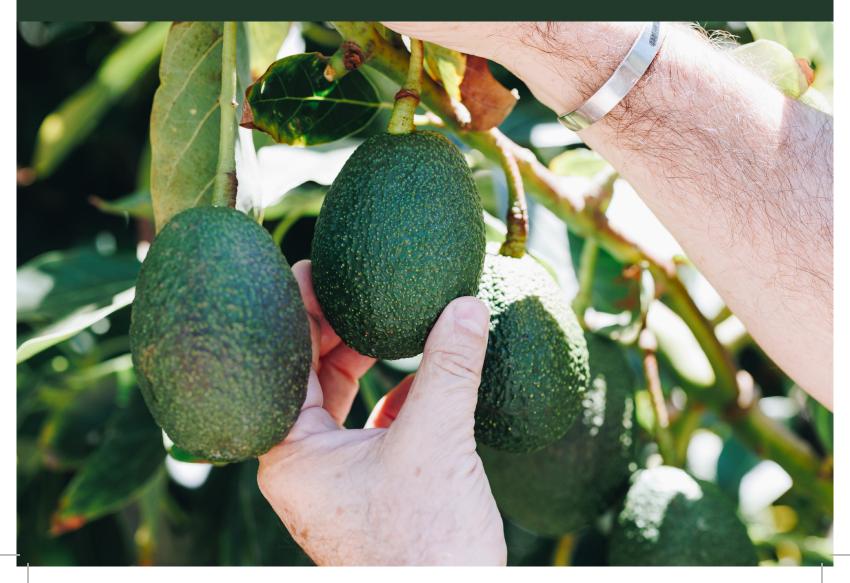


FY 23-24

Modern Slavery Statement

This statement is prepared in line with Modern Slavery Act 2018 (Cth) and covers the financial year from 1 July 2023 to 30 June 2024. It includes all activities conducted by Morco Fresh.





Introduction

The Modern Slavery Statement outlines the proactive measures that Morco Fresh, legally identified as The Stephen Moraitis Family Trust & The Trustee for The Paul Moraitis Family Trust, trading under ABN: 84 648 757 315, has implement to understand and mitigate the risks of modern slavery throughout our operations and supply chains.

We recognise that modern slavery can influence any industry or sector, carrying severe consequences for the victims and distorting global markets by undermining ethical business practices. This may also pose significant legal and reputational risks to organisation.

In compliance with Section 14 of the Modern Slavery Act 2018 (Cth), this statement is prepared for the 2023-2024 reporting year. Morco Fresh is committed to maintaining high ethical standards and responsible operations. We have a zero-tolerance policy towards any form of slavery within our business and supply chains. In preparing this statement, Morco Fresh has gathered and reviewed detailed information regarding our operations and supply chains to ensure the accuracy and integrity of this document.

This statement was approved by all partners of Morco Fresh on 21st November 2024 and is signed by

Paul Moraitis Executive Chairman



Our Organisational Structure

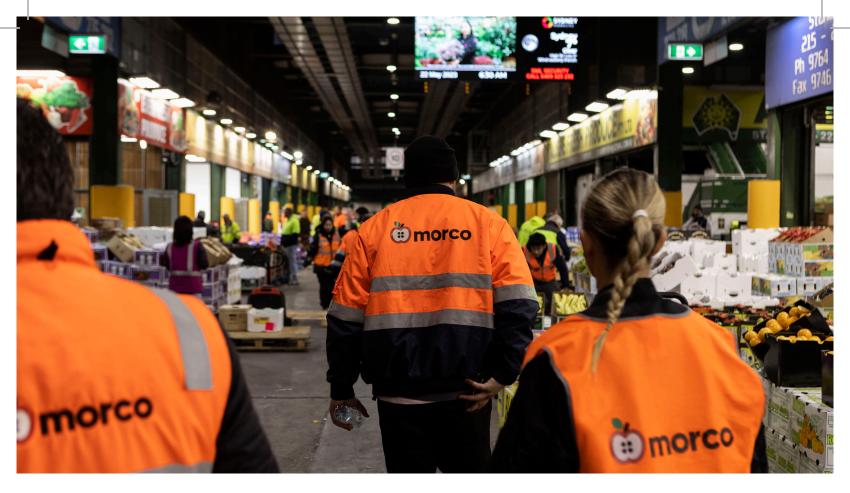
Morco Fresh operates as a partnership and is classified within the Fruit and Vegetable Wholesaling industry. Our unwavering dedication to quality and ethical practices is evident at every level of our organisation.

Leadership and Management

The strategic direction and overall management of Morco Fresh are overseen by our Board of Directors. Our executive team, including the Chief Operating Officer (COO), Chief Commercial Officer (CCO), Chief Financial Officer (CFO) and Sales Director, along with other senior executives, they are responsible for overseeing the dayto-day operations.

Departments and Teams

We have several key departments including Sales, Procurement, Marketing, Finance, Human Resources, Operations and Customer Service. Each department is led by experienced heads who ensure that their teams meet our high performance and ethical conduct standards. Altogether, Morco Fresh employs 350 staff members across the nation.



Our Operations

Morco Fresh is an Australian-based company deeply committed to upholding the quality and safety of fresh produce. Since its establishment in 2006, Morco Fresh has established a reputation for delivering consistent value to our customers by focusing on quality fruits and vegetables, reliable delivery and continuous improvement. With four locations across Australia including Sydney, Melbourne, Perth and Adelaide — Morco Fresh operates a single warehouse in each location and employs a team of 350 people. We are the sole national provider dedicated to the food service sector in Australia.

Additionally, 90% of our orders are delivered with our own fleet of 55 trucks, ensuring timely and reliable delivery across the country.

To consistently provide high-quality fruit and vegetables to the food service sector, we rely on stable, long-term relationships with trusted suppliers. These relationships, established through decades of family connections and strategic planning, form the foundation of our supply chain. This approach ensures a reliable and steady flow of fresh produce, allowing us to meet our operational needs efficiently. While flexibility is important in the industry, our preference is for enduring partnerships that can adapt to changing demands without sacrificing quality.

Our Supply Chain







Morco Fresh is responsible for ensuring all items that we procured from more than 400 suppliers nationwide are distributed, packed according to our customer requirements and delivered to their selected locations.

Our supply chain plays a crucial role to ensuring that products are sourced ethically and delivered to customers while maintaining quality. Fruits and vegetables are sourced from local market agents and directly from farms. During low supply periods, produce can be sourced from New Zealand to ensure availability. Other main service requirements for Morco Fresh operations include third-party freight and packaging material.

The fresh produce sector is considered high-risk for exploitation and abuse due to labour-intensive nature of harvesting fruits and vegetables, often involving seasonal workers, low wages, and harsh working conditions, making it more vulnerable to unethical labour practices.

We are dedicated to ethical sourcing, ensuring fair labour practices across our supply chain to minimise the risks of exploitation and modern slavery. Our goal is to provide our customers with confidence in the sourcing and delivery of fresh produce.

Risks of Modern Slavery

Morco Fresh's Commitment to Human Rights and Eradicating Modern Slavery

At Morco Fresh, we recognise that our operations can impact vulnerable groups, including casual and temporary workers, migrant labourers, unskilled workers, and contractors. We are committed to adhering to all laws and regulations that safeguard workers' rights. Simultaneously, we actively assess and address the risks of modern slavery within our business and supply chains.

Our supply chain covers sectors that face heightened risks of modern slavery, particularly in fresh produce sourcing. This area often involves complex supplier networks and seasonal labour, which can increase vulnerability to exploitation, such as forced labour and deceptive recruitment practices.

Beyond produce sourcing, other areas of our operations—such as external freight, IT services, cleaning, packaging, and labour hire—also pose significant risks. These sectors frequently rely on low-wage workers, subcontracting, and practices that can reduce transparency, making them more susceptible to modern slavery.

We regularly review our Australian suppliers, prioritising those in sectors or regions where modern slavery risks are most prevalent. By using a risk-based approach, we focus on the highest-risk areas and develop targeted actions to mitigate these issues.

Our response is tailored to the severity of the risks and our level of influence. When we have direct control, we implement corrective measures immediately. In situations where we are indirectly linked to risks, we collaborate with our partners to improve transparency and working conditions.

Through ongoing collaboration across our business, we are committed to preventing, mitigating and addressing modern slavery risks. We strive to ensure that ethical practices are upheld throughout our Australian supply chain.

Risk Assesment

We are committed to improving our efforts to eliminate modern slavery, using the risk assessment approach, we have created a risk register to assess our operations.

Risk Area	Description of Risk	Risk Level	Mitigation Actions	Current Status
Fresh Produce	High risk of exploitation due to reliance on temporary and seasonal workers.	High	Supplier self-assessments, ethical sourcing policies enforced. Audits on request.	Ongoing monitoring
Freight and Logistics	Low-wage subcontracting creates a risk of modern slavery within indirect suppliers.	Medium	Supplier self-assessments, ethical sourcing policies enforced.	In progress
IT and Cleaning Services	Potential risk due to outsourced, low-paid labour in certain regions.	Medium	Supplier due diligence, ensuring fair labour practices in service contracts.	In progress
Packaging Materials	Risk associated with suppliers using temporary or low-wage workers.	Low	Supplier self-assessments, ethical sourcing policies enforced.	In progress
Labour Hire Services	Significant risk of exploitation due to the involvement of temporary or contracted workers in low-wage positions.	High	Comprehensive supplier assessments, strict labour hire agreements, regular review of conditions.	Ongoing monitoring

Action Taken To Address Modern Slavery Risks

We set clear expectations that our employees and suppliers should be aware of possible involvement in modern slavery and should work to prevent and address it. We aim to raise awareness of our Policy and standards through a range of initiatives and guidelines.

- Training on Modern Slavery and Workplace Requirements has been developed and implemented within Morco Fresh.
- The employees are required to complete the training that is relevant to their role so that they are fully aware of the policy.
- Workplace policies have been implemented, include Child Labour, Discrimination, Forced Bonded Labour, Freedom of Association, Harsh Treatment Grievance and Working Hours Policies.
- A Whistle-Blower program has been implemented and its policy is stated within our Employee Handbook. This enables employees or external stakeholders to anonymously provide feedback to Morco Fresh about any non-compliance in its supply chain or otherwise about ethical workplace conduct or behaviors.

Whistle-Blower Program

Step One	Μ
Step Two	In
Step Three	A

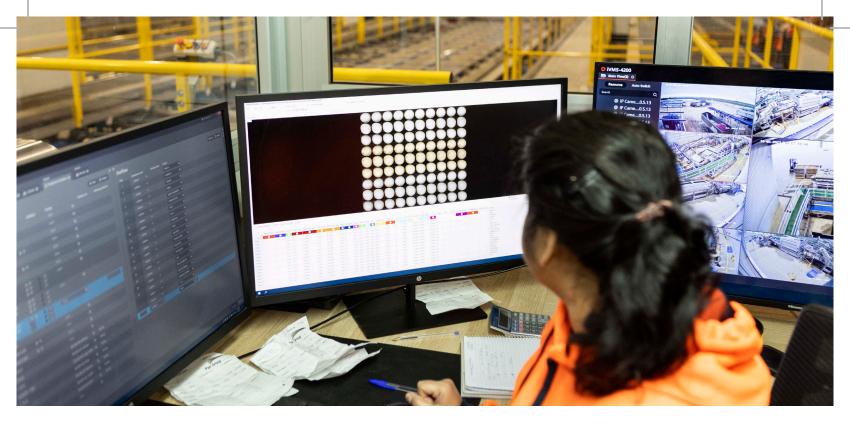
Monitor Wrongdoing Investigate on Monitored Wrongdoing Action Taken

Action Taken To Address Modern Slavery Risks

We collaborate with our stakeholders to continually improve our efforts in eliminating modern slavery.

- We incorporate feedback from all relevant internal stakeholders across different teams to thoroughly understand our risks and implement actions that have positive outcomes.
- Regular meetings with the Senior Management team about the Modern Slavery topic, to facilitate effective and strategic discussion that leads to meaningful progress.







- New suppliers are subject to an onboarding process, which includes a risk-based evaluation of their policies and practices, incorporating specific criteria and assessments related to modern slavery risks.
- Suppliers are required to complete the Approved Supplier Declaration Form and Modern Slavery and Trafficking Supplier Questionnaire, to ensure a thorough due diligence process is undertaken.
- Modern Slavery Risk Assessment based on Sector and Industry, Product and Services, Geographic and Entity risks for each group of current suppliers to rate their modern slavery risk and support remediation where risk has been identified.

- Connect suppliers on Sedex and monitor how they are progressing.
- Complete the Sedex Self Assessment Questionnaire (SAQ) against the SMETA 4 Pillars Standard (standard labour, health and safety and environmental performance) for all Morco Fresh sites, to provide supply chain transparency to the suppliers.

Assessing The Effectiveness of Our Actions

We aim to implement effective measures to reduce the risks of modern slavery throughout our operations and supply chain. We are committed to contributing to eradicating modern slavery and have established measures to measure the effectiveness of our initiatives.

Quarterly Review Meetings

We hold quarterly meetings with working groups from Executives, Procurement, Compliance, Human Resources, Finance, Information Technology, and Operations to review actions taken and address modern slavery risks.

Sedex Membership

Morco Fresh is a member of Sedex, using the platform to identify, address, and report modern slavery risks. Currently, 21 suppliers have completed their Sedex assessments and are linked to us.

Non-Sedex Suppliers

Suppliers not on Sedex are required to submit the Approved Supplier Declaration Form and complete the Modern Slavery Questionnaire as part of our due diligence process.

Regular Risk Assessment Reviews

We regularly check and update our modern slavery risk assessments to ensure they remain current and align with any new risks.

Staff Training & Evaluation

We assess staff understanding of modern slavery through quizzes conducted after training sessions. So far, 11 team members have completed modern slavery training, equipping them with the knowledge and skills to recognise and address modern slavery risks in our operations and supply chain.

Future Development

Risk Area	Description of Risk
Update Modern Slavery Statement	Align statement with the latest requirements of Modern Slavery Act.
Public Disclosure	Update and upload Modern Slavery Statement on our website to demonstrate our commitment to eliminating modern slavery and provide transparency for stakeholders regarding our policies.
Supplier Risk Assessment	Continue to assess our suppliers across various categories to identify modern slavery risks.
Expanded Training	Extend modern slavery awareness training to other departments beyond current group.
Regular Meetings and Reporting	Hold regular meetings with key staff to explore areas for continuous improvement and produce regular reports for internal stakeholders.
Improve Sedex SAQ Scores	Focus on improving Sedex Self- Assessment Questionnaire (SAQ) scores for all Morco Fresh sites.
Increase Supplier Engagement on Sedex	Work to increase number of suppliers linked with Morco Fresh on Sedex.
Supplier Due Dilligence	Request non-Sedex members to complete the Modern Slavery Questionnaire to ensure thorough due diligence is conducted.



Consultation

We do not own or control any other entities and therefore this criterion is not applicable.

We maintain ownership and oversight of our operations, promoting strong collaboration among internal stakeholders to ensure this statement effectively reflects detailed actions and steps undertaken by Morco Fresh. This approach supports our ongoing commitment to continuous improvement.

We continue to engage staff in modern slavery awareness and consultation, review existing policies to comply Modern Slavery Act and up to date, and broaden the depth of supply chain review.

Appendix

Mandatory Criteria	Page
Identify the reporting entity.	3
Describe the reporting entity's structure, operations and supply chains.	4-6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7-8
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	9-11
Describe how the reporting entity assesses the effectiveness of these actions.	12-13
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	14
Any other information that the reporting entity, or the entity giving the statement considers relevant.	1



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