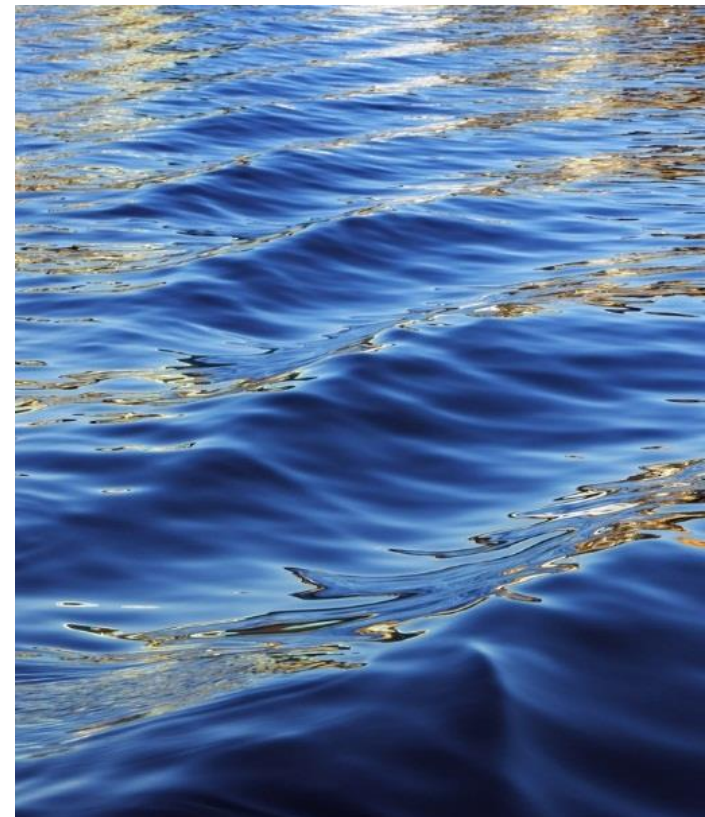




HS Fresh Food Holdings Pty Ltd

Modern Slavery Statement FY 22

Sustainability and Human Rights



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Foreword

As a leading producer of leafy mix and wet salads, and three family-owned companies combining to form a national company, HS Fresh Food holds its commitment to protecting human rights in its business. Addressing modern slavery and the exploitation of human rights across the supply chain is an important priority, particularly as the majority of ingredients come from farmers and suppliers of agricultural products.

HS Fresh Food is a purpose driven business on a journey with the motto “*Grow, Create, Flourish*” - the words have been carefully chosen to make reference (not limited to) our environment, people and products that we develop. Our company values – Honesty, Respect, Accountability, Innovation and Planet are significant in the way we operate our business.

HS Fresh Food abides by several company policies and processes, including the Company Code of Conduct and Supplier Quality Adherence agreement. However, the introduction of the *Modern Slavery Act 2018* (Cth) heightened HS Fresh Food’s focus to protect the human rights and the integrity of its supply chain.

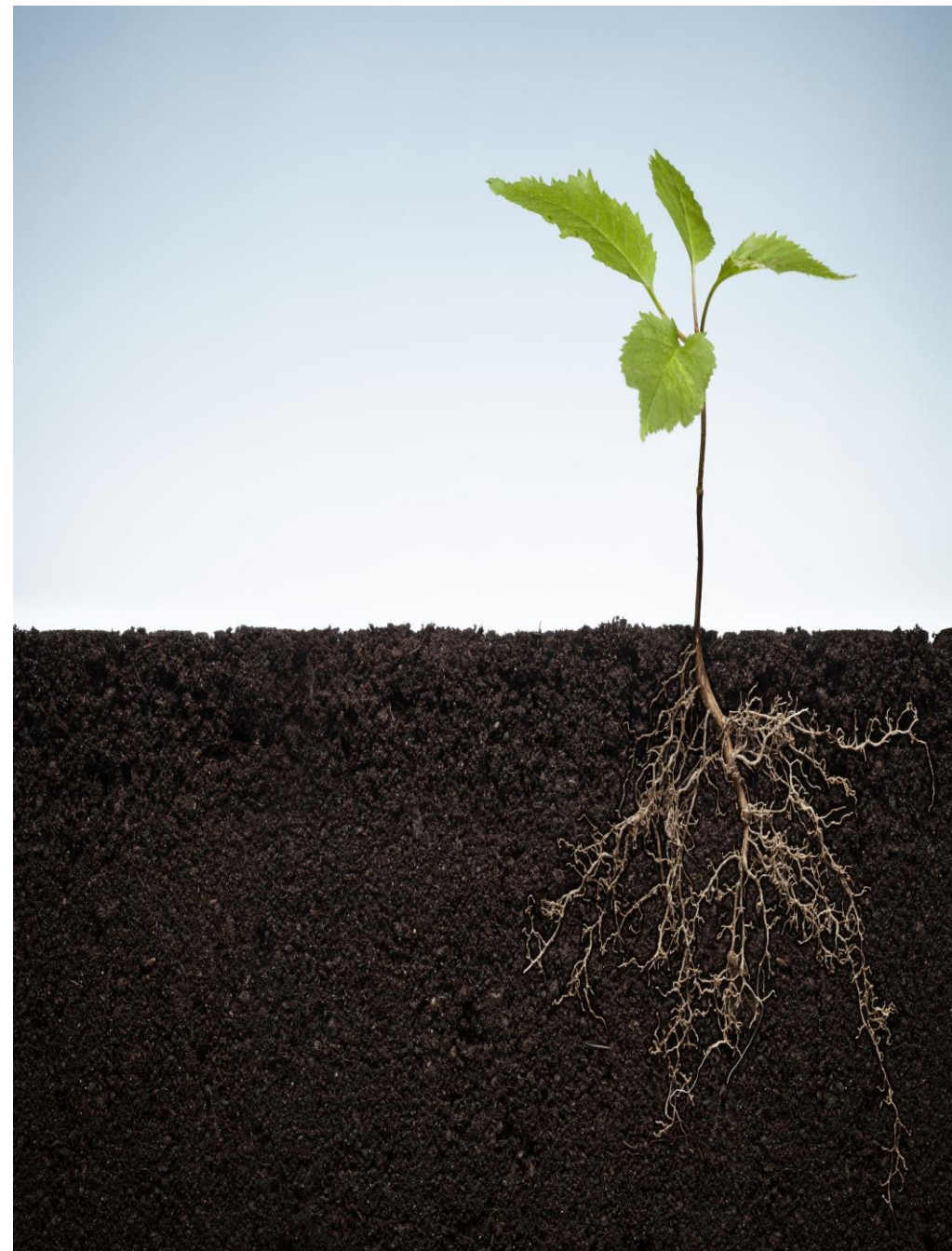
With the growth of the company, HS Fresh Food has continued to develop a framework of guiding principles to ensure that business practices are a part of the solution to eradicate modern slavery, particularly within the agricultural supply chain. In Australia, the Modern Slavery Committee has built on this foundation to effectively address regional risk.

The business has adopted a zero-tolerance approach to Modern Slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships. The initiatives include (and are not limited) to expanding employee awareness and training programs, assessing suppliers, and placing a greater emphasis on identifying and addressing modern slavery risks in our indirect supply chain.



HS Fresh Food Pty Ltd Modern Slavery Statement

This statement is made under the Modern Slavery act 2018 (Cth). It sets out the actions taken by HS Fresh Food Pty Ltd





Structure, Operations and Supply Chain

HS Fresh Food Pty Ltd is a national business that was recently formed from three family-owned operations. Houston's Farm in Tasmania, JMark in Western Australia and Sunfresh from South Australia. The head office of HS Fresh Food is located in Cambridge, Tasmania Australia.

HS Fresh Food is a privately owned, national supplier of fresh produce and consumer ready products (predominantly in the salad segment). It also has a farming operation in Tasmania that supplies its Cambridge facility with various types of salad leaf. The majority of production is supplied to the local retail market, followed by foodservice and independent grocers. It also supplies product in the export market.

Our portfolio of controlled entities includes HS Fresh Food Pty Ltd (ACN 638 495 655), HS Fresh Farms Pty Ltd (ACN 638 495 664) and HS Salads Pty Ltd (ACN 640 565 966).

HS Fresh Food Holdings Pty Ltd operates out of six locations across Australia.

- Tasmania 121 Backhouse Lane Cambridge Tas 7107
- South Australia 7-8 Sharp Court, Mawson Lakes SA 5095
- Queensland Martin Taylor Drive, Rocklea Qld 4106
- Western Australia 54 Prestige Pde, Wangara WA 6065
- Forcett Farm 45 Lewisham Drive Forcett Tasmania
- Daisy Bank Farm 87 Colebrock Road, Richmond Tasmania



Structure, Operations and Supply Chain



Over the course of the year, our group of companies, employs on average 600 employees and many more indirectly through our logistics and supply chain. We are a trusted supplier to the major retailers in Australia and other independent customers.

We are proud of our place in the national market, the quality products that we produce and the relationships we have cultivated with our many suppliers. The overwhelming majority of our ingredients and packaging requirements are either grown or manufactured in Australia as well as our very own farming operations in Tasmania.

The supply chain of products and services that contribute to our operations includes raw agricultural materials – the top categories being salad vegetables such as lettuce, spinach and other varieties, potatoes, pasta, hard vegetables and condiments. In the FY21 accounts, the largest category of spend was on agricultural products, and specifically salad leaf. The largest supplier is from our internal farms.

- Since the establishment of HS Fresh Food, we have taken three family run businesses to form a national company with one set of values and policies. We consider the social and environmental impact of every decisions we make and strive to be a force of positive change.

Key Areas of Focus

With the establishment of HS Fresh Food, we have formed a national company with one set of values and policies. We consider the social and environmental impact of every decision we make and strive to be a force for positive change. We value every individual for who they are and what they bring to the team. These are the values that underpin our mission to ensure that Human Rights and Human Dignity are upheld, including reducing the risk of modern slavery in every deal, every transaction with every trading partner and within our own operations nationwide.

HS Fresh Food not only produces "***Food for a Better Life***" we have placed additional targeted emphasis on the critical area of corporate responsibility since the introduction of the ***Modern Slavery Act 2018 (Cth)***. We are committed to the eradication of modern slavery, and we will always act quickly and decisively in the best interest of affected workers whomever they are so they are able to "***Work for a Better Life***".



Practices in Our Operations and Supply Chain

As our base business has originated from a multiple of family businesses, we have treated our employees as family members. HS Fresh Food operates according to its core values and understands that there is an inherent risk of exposure to the threat of modern slavery and labour exploitation in food and agriculture supply chains from production and processing to packaging and transportation.

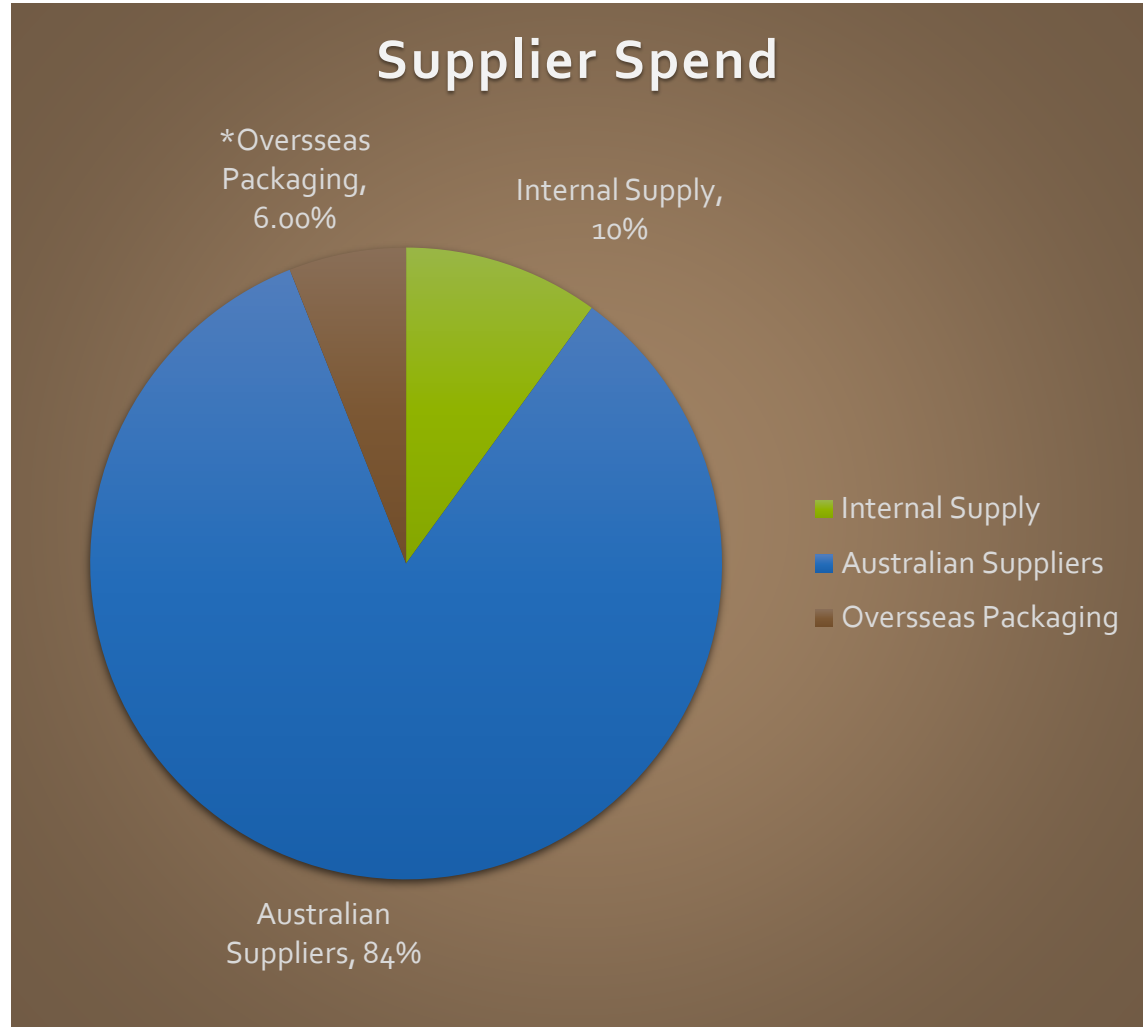
Although HS Fresh Food makes all of its purchases via Australian suppliers, we are mindful that certain items are produced overseas – such as packaging and chemicals.

HS Fresh Food works closely with its suppliers to develop relationships that support mutually beneficial outcomes and strengthen our combined approach to product traceability and human rights.

Policies, contracts, monitoring activities, regular communication and engagement with our team members and partners are key controls we have established to manage potential or actual risk of modern slavery in our operations and supply chain.

We have a comprehensive set of policies, standards and practices that outline our values and ways of working.



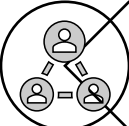


We expect our Partners to use best endeavours to ensure that they do not engage in modern slavery.


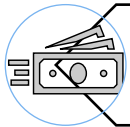
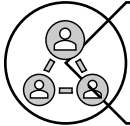
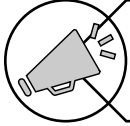



* Overseas packaging is predominantly plastic bowls from Malaysia with an accredited supplier.

Mitigating Risk and Addressing Modern Slavery

The following references are deemed most relevant to preventing modern slavery in our operations and supply chain.

	<p>HS Fresh Food Code of Conduct.</p> <p>Defines the national behavioral expectations we have of our employees with respect to colleagues, suppliers, customers and member of the community.</p>
	<p>Procurement Policy</p> <p>Outlines the process for procuring goods and services and requires activities to be conducted in an honest, competitive, fair and transparent manner.</p>
	<p>Enterprise/Employment Agreements</p> <p>HS Fresh Food has various employment agreements in place across our operations, which cover a significant portion of our workforce.</p>
	<p>Grievance, Complaints & Anti Bullying Procedure</p> <p>Provides a framework and encourages the reporting of instances of suspected unethical, illegal, fraudulent or undesirable conduct involving HS Fresh Food..</p>
	<p>Site Audits</p> <p>Our sites are subject to periodic customer audits in line with our contractual obligations.</p>

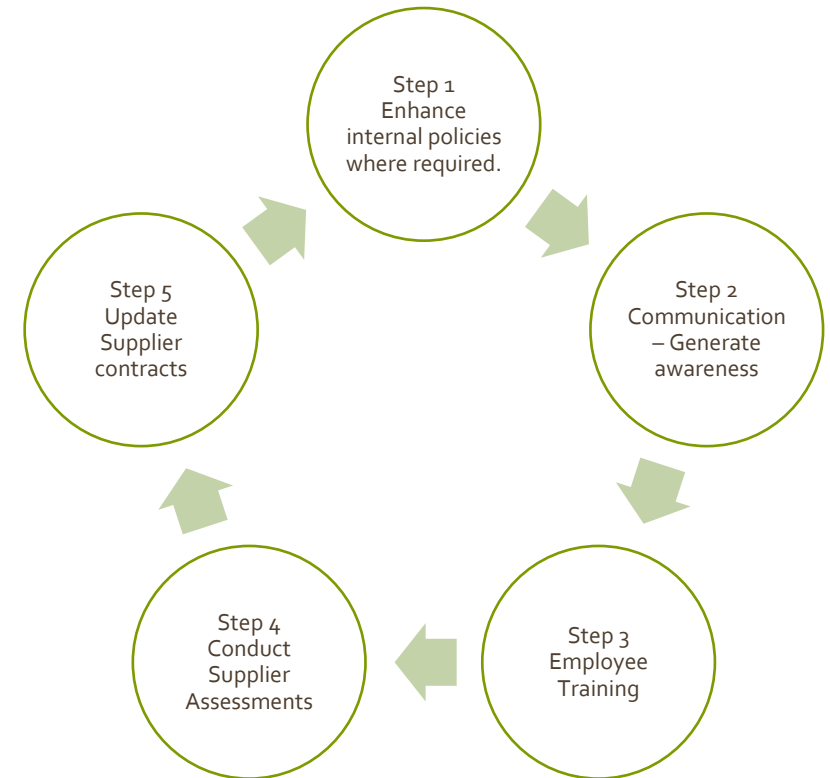
	<p>Approve Supplier List</p> <p>HS Fresh Food requires suppliers to meet a set of predetermined standards in order to do business with us.</p>
	<p>.Bribery and noncompetitive behavior</p> <p>HS Fresh has strict policies around fraud, bribery, money laundering, corruption, secret commissions, or behaviors that threatens others .</p>
	<p>Partner Code of Conduct</p> <p>. HS Fresh Food expects partners to adhere to all applicable laws and regulations and to use their best endeavors to comply with principles.</p>
	<p>Independent Counselling and whistleblowing</p> <p>All employees have access to a free hotline where they are able to advise of any illegal or unethical activity. All claims are independently investigated.</p>
	<p>Supplier Audit Program</p> <p>HS Fresh Food Quality and Farm Team s conduct a vendor assurance program that includes a supplier audit schedule.</p>

We expect our partners to use their best endeavors to ensure that they do not engage in modern slavery, HS Fresh Food will not knowingly conduct business with suppliers who violate laws relating to employment, the environment or safety, or engage in any other unethical employment practice.

We aim to ensure that our team members and suppliers understand our expectations and know how to raise a grievance or complaint should these policies, standards or practices not be followed.

Our Approach

- **Enhance Policies** — HS Fresh Foods believes that strong internal policies and systems are a key aspect of managing and mitigating the risk of modern slavery in its operations and supply chain. HS Fresh Food expects the same level of diligence in regard to the protection of human rights from its suppliers as from its employees. These policies and other programs – such as quality adherence and sustainability programs, ensure that team members and suppliers are dedicated to managing social, ethical and environment issues in a responsible manner .
- **Communication** - This involves communicating with our suppliers about HS Fresh Food’s modern slavery requirements and providing general awareness and education about the issue.
- **Employee Training and Compliance** - We continue to implement new programs to increase employee awareness and engagement regarding modern slavery. During 2021 and 2022 we are and we will be communicating with all staff about modern slavery.
- **Supplier Assessments** - We will conduct risks assessments across our local, national and international supply chains
- **Supplier Contracts** - Update our standard supplier contracts to incorporate our Modern Slavery statement and requiring compliance from our trading partners with the Modern Slavery Act 2018 (Cth).



Our Assessment

To date, no instances of modern slavery have been identified in our supply chain.

HS-Fresh Food's belief that 'good ethics' is good business, has guided it from paddock to plate, and is the basis of its values. On this basis HS Fresh Food has built relationships with growers spanning many years and is recognized for its commitment to sustainability.

It is through these strong relationships and regular contact with suppliers that we are able to regularly review supplier assessment process.

Our existing policies are monitored regularly, and we will conduct regular audits of the modern slavery program.

We will continue to evaluate suppliers and practices. The extent of actions taken to address modern slavery risks will be measured by certain quantitative metrics, such as the number of individuals trained, contract signed with appropriate modern slavery contractual provisions and the number of audits undertaken.

More importantly, the effectiveness of actions undertaken will be assessed by means of metrics, such as complaints via the grievance and complaints process and investigations launched, if any, and the number of successful audits and resolved non-compliances generated in ethical audits if any.

HS Fresh Food will continue to work closely with our team members and suppliers to further understand the potential risks of modern slavery in our supply chain. We are committed to further embedding our policies, standards, and practices across our business.

Through these actions, we believe we are helping to raise awareness of modern slavery and the actions required to effect change.

This statement was approved by the Board of Hs Fresh Food Holding Pty Ltd 27th October 2021.

Richard Hopkins

Richard Hopkins

Director & Chief Executive Officer, HS Fresh Food Holding Pty Ltd