

MODERN SLAVERY POLICY

APPLICATION/STRUCTURE

Bright Food Asia Pacific Pty Ltd (**Bright Food Asia Pacific** or **BFAP**) is the principal governing body that manages and controls all its subsidiaries in Australia, New Zealand and Asia (the **Group**). All entities within the Group operate under a common set of governance policies and programs. This includes the programs through which modern slavery risks in our operations and our supply chains are assessed and addressed. A process of consultation across all Group entities helped guide the drafting of this statement. Each individual entity directly or indirectly trades and operates with its own workforce as well as with suppliers and Third-Party logistics mechanisms locally and around the world but is ultimately governed by the Bright Food Asia Pacific Pty Ltd Board.

POLICY STATEMENT

At Bright Food Asia Pacific, our commitment to respect human rights is embedded in this Modern Slavery Policy. We will respect human rights in all our operations and business dealings.

Slavery, servitude, child labour, forced labour, human trafficking, and any related exploitation (together, “**modern slavery**”) will not be tolerated by Bright Food Asia Pacific.

This policy is designed to ensure that Bright Food Asia Pacific and its business partners complies with the applicable laws in the jurisdictions in which Bright Food Asia Pacific operates and with relevant international standards, including the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

IDENTIFYING MODERN SLAVERY

We will conduct due diligence to identify and assess the risk of modern slavery in our business and supply chain, and remediate it, where required. We will review and re-assess our approach on a regular basis.

It is Bright Food Asia Pacific’s responsibility to ensure that there are safe and effectively managed channels and procedures to report modern slavery. As such, Bright Food Asia Pacific uses the People & Culture (P&C) email address: peopleculture@brightfood.com.au as a key reporting vehicle.

POLICY ENFORCEMENT

The Bright Food Asia Pacific management team has overall responsibility for ensuring this policy complies with our legal obligations and that Bright Food Asia Pacific staff and others under our control comply with it. All directors, senior management, and supply chain employees must:

- a. read and understand this policy.
- b. undertake necessary training, where relevant.
- c. avoid any activity that might lead to, or constitute modern slavery; and

- d. raise any concerns and report any actual or suspected modern slavery at Bright Food Asia Pacific or at our business partners either to the appropriate line manager, People & Culture team or via the P&C email address.

Any suspected breach of this policy will be investigated, and any person found to be in breach may face disciplinary action.

To ensure compliance with this undertaking and policy, we include a stringent process to consider and review all our suppliers of goods and services. Our Group Approved Supplier Program requires a formal assessment of potential suppliers and only approves transactions with those suppliers who share these views and principals. This commitment is reconfirmed as part of the Approved Supplier audit program.

The companies Vendor Quality Management (VQM chapter 6) manual details requirements to ensure we apply the most stringent criteria to our supplier selection and confirmation before approving any supplier, in an effort to ensure we only conduct business with suppliers who share these objectives and who therefore comply with the conditions of the Australian Modern Slavery Act 2018.

COMMUNICATION

This Policy will be posted on Bright Food Asia Pacific internal intranet for employees.

REVIEW

Additionally, Bright Food Asia Pacific will review annually the end of each financial year the Modern Slavery Policy and, if required, submit to the appropriate regulatory authorities, in compliance with section 13 of the Australian Modern Slavery Act 2018.

APPROVAL

This statement has been signed on behalf of the Bright Food Asia Pacific Pty Ltd Board.



Richard Meagher
Chief Executive Officer and Executive Director of the Board
Bright Food Asia Pacific Pty Ltd



Peter Gunning
Chief Financial Officer and Executive Director of the Board
Bright Food Asia Pacific Pty Ltd