

## Modern Slavery Act Statement 2025

A JOINT STATEMENT FOR THE LITE N' EASY GROUP

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## 1. Reporting Entities

This Statement has been published in accordance with the *Modern Slavery Act 2018* (Cth) (MSA or Act). It describes the steps the Group took to identify, assess, mitigate and remediate modern slavery risks in its operations and supply chain during the reporting period 1.7.2024 to 30.6.2025 (F25). Lite n' Easy makes this joint Modern Slavery Statement (joint statement or statement) on behalf of the reporting entities listed below.

As a joint statement, made under section 14 of the Act, we refer to a number of reporting entities:

Company	Reporting entity or Voluntary reporting entity	
<ul> <li>Lite n' Easy Pty Ltd ACN 010 655 820 and its subsidiaries:</li> <li>Lite n' Easy (VIC) Pty Ltd ACN 153 499 579</li> <li>Lite n' Easy (NSW) Pty Ltd ACN 165 076 380</li> </ul>	Reporting entities under the Act	
• Lite n' Easy (QLD) Pty Ltd ACN 066 985 073	Reporting entity under the Act	

We use 'Lite n' Easy' or 'Group' when collectively referring to the above entities throughout this statement.

This joint statement was approved and signed by G. Mitchell in his role as the Sole Director of each of the reporting entities on 30 September 2025.



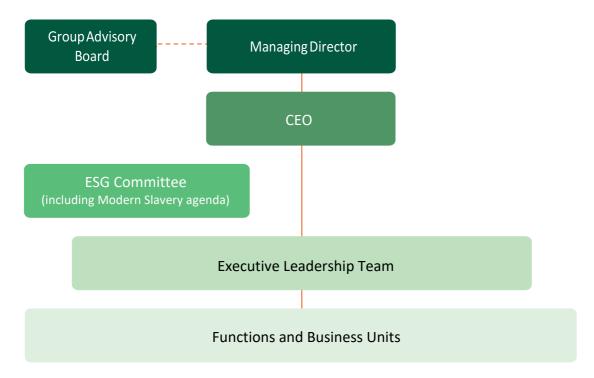
G. Mitchell

Managing Director of Lite n' Easy Group

## 2. Structure, Operations, and Supply Chains

#### **Our Structure & Governance**

Lite n' Easy Group is a private, non-consolidated group of companies with headquarters in Banyo, Queensland. All reporting entities have an ultimate common shareholder and leadership team.



Our risk assessment and management approach are consistent across each of the Lite n' Easy entities covered by this statement. All policies, systems and processes are designed to be applied across the Group. Our ESG Committee oversees matters relating to social governance including reviewing our approach and compliance with the MSA.

#### **Our Operations**

We produce more than 1.5 million meals every week in our 6 state-of-the-art kitchens nationwide. With headquarters and central manufacturing in Banyo, Queensland the company has contact centres around Australia and meals are 'made to order' within each state.

Shared head office functions, executive, and manufacturing of all Lite n' Easy frozen meals is centralised in Brisbane.

We source fresh produce, raw materials, and service providers to manufacture and deliver nutritious meals direct to customers and aged care facilities. Our key brands include Lite n' Easy, My Choice, Taste Express and Lite n' Easy Select.

Our workforce comprises more than 1600 team members, the majority of which are employed full-time across our 6 sites in Brisbane, Sydney, Melbourne, Adelaide, Perth, and Townsville. Our operations are wholly based in Australia, we do not employ anyone outside of Australia.

#### **Our Supply Chain**

We source high quality ingredients, raw materials, and services from both trade and non-trade suppliers.

We view and require our supplier relationships to be both strategic and ethical partners to the business. We predominantly source the meat, vegetables, fruit, and dairy used in our meals locally from within Australia. Our packaging, snacks and portion-controlled items are also manufactured in Australia, using local and imported raw materials. These suppliers have a long-standing reputation within their industry and are aware of modern slavery obligations. We also have non-trade suppliers providing various goods and services to including corporate services, IT and property management.

Our Tier 1 suppliers fall within the following groups:

✓ Fruit & Vegetable	✓ Consumables	✓ Corporate Services
<b>√</b> Ingredients	✓ Freight & Stores	<b>√</b> ICT
✓ Meat & Seafood	✓ Waste Management	<b>√</b> Other
✓ Packaging Materials	✓ Property, Plant & Equipment	
✓ Energy & Utilities	√ Trades & Services	

Our procurement model is both centre-led and decentralised. High volume, high spend category purchases are mostly centre led, while site-specific purchases are decentralised where subject matter experts hold responsibility for departmental purchases.

# 3. Risks of Modern Slavery Practices in Operations and Supply Chain

We are committed to continuously improving our risk identification capability and do this through our ESG Committee in consultation with category specialists. Lite n' Easy recognises that addressing risks in the supply chain requires a long-view commitment to address risk appropriately over time.

Our team members benefit from working in state-of- the-art manufacturing facilities that are 100% located in Australian capital or regional cities. We consider our operations to be low risk for potential human rights breaches. Where possible we source our raw materials domestically with the majority of our Tier 1 suppliers being Australia-based.

#### **Our Operations - F25 Focus Areas**

Within our own operations, the risk of modern slavery is considered low. All facilities are in Australia and benefit from strong labour laws. Our workforce is directly employed or engaged through reputable labour hire firms under Australian workplace agreements. We have zero tolerance for any form of forced labour or unlawful practices in our operations and apply rigorous HR controls to prevent them (e.g. work-right checks, standard working hours, overtime pay, freedom of association). A potential risk in our operations is the use of agency or contracted labour for low-skilled roles, which in some industries has been associated with exploitation of migrant workers or excessive hours. We mitigate this through careful selection and monitoring of labour providers and by upholding fair employment conditions for all workers on our sites.

Supply groups within our operations at higher risk of modern slavery practices:

Group	Risk Level	Potential Risk Area (examples of risks)	Mitigation Approach
CONTRACTING - AGENCY LABOUR	Low risk	Low skilled labour – LNE facilities with low-skilled workers  • Exploitation of low-skilled workers  • Excessive working hours	<ul> <li>Confirmation of VEVO right-to-work checks for new team members that are non-Australian citizens or permanent residents.</li> <li>Ensuring English proficiency.</li> <li>Providing skills training and development.</li> <li>All workers (direct or agency) are paid per national awards or Enterprise Agreements.</li> </ul>

Our operations benefit from modern facilities and a stable workforce, which means there were no indicators of forced labour or similar exploitation identified internally during F25. We remain vigilant, however, especially when using any third-party staffing services. In F25 we reviewed our labour hire arrangements considering modern slavery risks, including direct engagement with our key labour

providers to ensure their practices align with our standards (e.g. transparent recruitment, no fees charged to workers). This confirmed our operational risk controls are effective. Overall, our controlled operational environment and Australian legal framework act as strong safeguards against modern slavery within Lite n' Easy.

#### **Our Supply Chain - F25 Focus Areas**

In our supply chain, the risk of encountering modern slavery is inherently higher given the breadth of our procurement and the potential for global sourcing. While many of our Tier 1 suppliers are Australian companies (lowering risk), some supply chain segments involve imported goods or sectors known to have labour exploitation issues globally. We have identified several higher-risk areas in our supply chain, particularly among suppliers of certain food commodities and manufactured inputs.

Supply groups within Tier 1 (direct supplier to our Group) of our supply chain known for higher risk of modern slavery practices:

Tier 1 Suppliers	Risk Level	Potential Risk Area (examples of risks)	Mitigation Approach
FRESH AND SEASONAL PRODUCE  Domestic suppliers of fresh fruit and vegetables	Low risk (in Australia)	Labour-intensive farming: Exploitation of migrant farm workers; Deceptive recruitment by Labor contractors; Underpayment of wages; Excessive working hours.	<ul> <li>Fresh produce is predominantly sourced within Australia.</li> <li>Established partnerships and strong relationships with horticultural suppliers.</li> <li>Supplier assurance processes by our Supply Chain and Quality teams.</li> <li>Ethical sourcing due diligence process is undertaken with key suppliers.</li> </ul>
IMPORTED RAW MATERIALS, INGREDIENTS & PACKAGING  Australian-based importers of:  • Fresh produce and proteins • Ingredients • Packaging	Medium to high risk (global supply chains)	Complex international supply chains: Exploitation of factory or plantation workers abroad; Forced/child labour in source countries; Excessive hours and poor conditions; Debt bondage via recruiters.	

MEAT PROCESSING  Domestic suppliers of meat products or render services	Medium risk (in Australia)	Labour hire and processing vulnerabilities: Exploitation of migrant meatworkers; Underpayment of wages; Excessive working hours; Use of labour hire in processing plants with potential oversight gaps.	· ·
TRANSPORT  Domestic freight and logistics providers	Medium risk (in Australia)	Subcontracting and logistics complexities: Subcontracted drivers and third-party logistics with limited oversight; Underpayment of wages; Excessive working hours; Vulnerability of migrant workers in warehousing and delivery.	<ul> <li>Introduction of an RFP process that includes ESG related due diligence and contract requirements.</li> <li>Improved contractual terms with reputable providers.</li> <li>Supplier assurance by Supply Chain teams.</li> <li>Appointment of a Logistics Manager – new internal role.</li> </ul>

#### 4. Actions Taken in F25 to Assess and Address Those Risks

Lite n' Easy remains committed to upholding social responsibility by maintaining compliance with national labour standards and promoting decent work conditions across our operations and supply chain. In line with stakeholder expectations and industry benchmarks, we continued to strengthen our ethical sourcing and human rights due diligence framework throughout F25.

Key activities undertaken during the year focused on enhancing internal capability particularly within our supply chain team and deepening engagement with both existing and prospective suppliers. These efforts aimed to embed modern slavery risk management into core business practices and improve transparency across our procurement processes.

#### **ACTION 1**

#### Enhanced Ethical Sourcing - Transition to a digital due diligence platform

In February 2025, we initiated a structured supplier risk assessment program using the *iPRO Modern Slavery Assessment Tool* to evaluate Tier 1 suppliers' practices related to modern slavery and broader human rights. This marks a shift from manual-scored assessments to a more standardised technology-enabled risk scoring approach.

The survey invited participation from 85 Tier 1 suppliers identified, covering raw materials, packaging, and services with higher inherent risks. Topics included workforce demographics, labour rights policies, recruitment practices, subcontracting, and existing certifications or audits.

By the end of F25, 75 suppliers had completed the survey, an 88% response rate. The iPRO Tool assigned risk ratings based on supplier responses and inherent risk factors such as country of origin and product category. Results showed:

- 36 suppliers rated as *Medium Risk (Partial Controls)* indicating areas for improvement.
- 28 suppliers rated as Low Risk (Adequate Controls).
- 10 suppliers rated as *High Risk (Inadequate Controls)* highlighting procedural gaps or elevated risk exposure.

Overall, on average, our suppliers have **partial risk control**. No confirmed instances of forced labour or illegal practices were identified. The "high risk" ratings reflect potential vulnerabilities rather than verified violations.

To support implementation, procurement team members were trained on using the iPro Tool in January 2025. This onboarding ensured consistent application of the tool and improved internal capability to interpret supplier responses and risk ratings.

Improved visibility into our supply chain risks enables informed engagement with suppliers. These insights support procurement decisions and guide future risk mitigation efforts.

We plan to repeat and expand the survey annually, progressively including more suppliers and tracking improvements over time.

#### **Human Rights Impact**

- Launched iPro platform for digital supplier risk assessment.
- Improved supply chain transparency and risk management.
- Strengthened ethical sourcing and motivated supplier improvement.

#### **ACTION 2**

#### Workforce Learning - Building awareness of modern slavery risks across our team

Employee education remains a key component of Lite n' Easy's approach to managing modern slavery risks. In F25 we delivered targeted refresher e-learning to selected personnel, with particular focus on our supply chain team, recognising their critical role in identifying and mitigating modern slavery risks within supplier relationships.

A total of 46 team members completed our online Modern Slavery training module via our compliance learning management system. This comprised 18 supply chain team members nationally, such as procurement specialists and logistics personnel whose roles directly influence supplier engagement and purchasing decisions.

For most participants, this was a refresher following earlier training delivered in 2022 and expanded in 2024 to ~400 team members across the business. The F25 module reinforced foundational knowledge and awareness to key team members. Upon completion, employees gained a working understanding of the eight types of modern slavery defined in the Act, how these risks may arise in our operations or supply chain, and the appropriate reporting channels.

Ongoing workforce education is integral to mitigating the risk of undetected instances of modern slavery within our operations. By equipping staff with the knowledge and tools to identify and address potential risks, particularly in supplier management and labour hire contexts, Lite n' Easy reinforces its commitment to ethical business practices and upholds its obligations under relevant legislation.

#### **Human Rights Impact**

- Greater supply chain staff awareness of risks and compliance.
- Employees understand how to identify and report concerns.
- Strengthening our culture of ethical supply chain engagement.

#### **ACTION 3**

#### Supplier Onboarding Integration – Embedding anti-slavery criteria into procurement

During the reporting year, we strengthened our procurement framework by embedding modern slavery risk assessment into supplier onboarding and request-for-proposal (RFP) processes. From April 2025, new raw materials and packaging suppliers are required to complete our modern slavery risk assessment or provide equivalent evidence of due diligence (e.g. a third-party human rights audit and current modern slavery statement). Procurement documentation including RFP templates, supplier qualification checklists, and standard contract clauses were updated to reflect these requirements.

As part of these updates, our RFP process requires prospective suppliers to take actions to reduce their risk score to a level of at least 'medium risk' classification. Suppliers with demonstrated ethical sourcing credentials may be fast-tracked or exempted from duplicate assessments.

By year-end, this onboarding model was operational with rollout and procurement team training complete. This shift embeds modern slavery considerations into routine procurement practice, supporting early risk identification and reinforcing supplier accountability.

#### **Human Rights Impact**

- Modern slavery risk checks are now standard in supplier onboarding.
- Early detection and transparency have improved in procurement.
- Ethical sourcing standards are enforced from the start of supplier relationships.

#### **ACTION 4**

#### Supplier Engagement - Tailored support for smaller suppliers

In FY25, Lite n' Easy undertook targeted engagement with selected Tier 1 suppliers to enhance their understanding of modern slavery risks and our ethical sourcing requirements. Particular attention was given to smaller, agriculture-based suppliers, recognising that standard survey tools and documentation may not always be feasible or relevant for these partners.

A tailored engagement approach is needed where small businesses, who play an essential role in our value chain, may require additional support to satisfy due diligence obligations. Where appropriate, Lite n' Easy provided tailored assistance, including personalised guidance and face-to-face engagement, to build capability and clarify expectations.

These interactions not only strengthened our supplier relationships but also enhanced understanding of our ethical sourcing standards and identified areas for further support, particularly in sectors with increased labour risk exposure.

By complementing digital due diligence efforts with direct engagement, Lite n' Easy reaffirms its commitment to supporting all suppliers in achieving our ethical sourcing objectives.

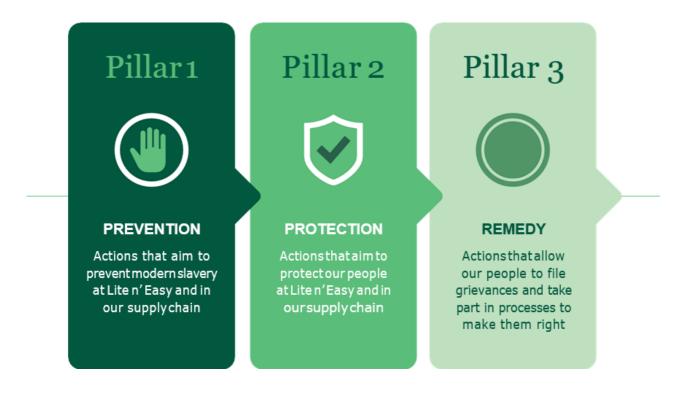
#### **Human Rights Impact**

- Reinforces strong supplier relationships through direct engagement.
- Greater understanding of modern slavery risks among small suppliers.
- Commitment to practical, inclusive ethical sourcing.

## 5. Assessing the Effectiveness of Actions

Lite n' Easy has set practical metrics to assess the progress and effectiveness of our ethical sourcing program. We acknowledge that our success will be dependent on how we measure the implementation of our planned program of work and our ability to refine our approach, as necessary.

The effectiveness of our F25 actions will be assessed across three broad pillars which are adapted from the United Nations Guiding Principles on Business and Human Rights (UNGPs):



We utilise the benchmarking and KPI's in the *iPRO Modern Slavery Assessment Tool* to assess the effectiveness of our actions.

The primary indicators we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process. Each organisation who completed the assessment questionnaire was assessed and given 2 risk scores:

- Inherent Risk Score
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic or 'built-in' to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

Lite n' Easy is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score. We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment program to better identify and mitigate modern slavery risks in our supply chain.

## **Effectiveness Indicators**

Performance against these metrics will be reported on a regular basis to Lite n' Easy's ESG Committee. We intend to review and refine our approach periodically to consider any emerging modern slavery risks.

Indicators		Metrics	F25 Performance
PILLAR 1	ESG Committee (oversight)	Number of meetings	2
		Planned versus actual modern slavery activities delivered	All activities delivered including approved supplier program
PILLAR 1	Policy Committee	Policies maintained according to changes in relevant laws and regulations	No change required or made to relevant MS policies
PILLAR 1	Policy Inventory	Modern slavery policy reviewed in cycle	No changes
		Internal communication of new or updated policies	Nil
PILLAR 1	Prioritising Risk in our Supply Chain	Identification of priority supply categories and suppliers	Ongoing from F23
PILLAR 2	Ethical Sourcing Survey	Vendor response rate	75/85 completions (iPro)
	(Supply Chain)		(88.2% completion rate)
		Supplier risk-rating result (average)	Partial Risk Control
		Aggregated supply chain risk scores (inherent and	Inherent Risk Score: 47.93/100
			Unmitigated Risk Score: 25.74/100
		Number of remediation action plans and/or RFI's enacted	Nil

		Number of human rights breaches identified	Nil
PILLAR 2	Ethical Sourcing Survey (Our operations)	Our operations risk score (inherent and unmitigated)	Inherent Risk Score: 90.00/100 Unmitigated Risk Score: 18.73/100
PILLAR 2	Integration with Approved Supplier Program	No. prospective vendors rejected on the basis of modern slavery compliance	Nil
PILLAR 2	Training - Modern Slavery Online Compliance Course	Number of staff who completed the e-learning course	46 team members
PILLAR 3	Grievance and Whistleblower Mechanisms	Number of human rights related incidents reported	Nil
		Number of human rights related incidents remediated	Nil
		Broad staff awareness of, and accessibility to, these support mechanisms	Company policies including our Code of Conduct, Grievance Policy and Whistleblower Policy

## 6. Consultative Process Across Lite n' Easy Group

In F25, we continued the development and implementation of internal initiatives across our operations that aid in identifying potential risks of modern slavery.

Lite n' Easy is overseen and managed by a common director and leadership team, with all policies, systems and processes designed to be consistently applied across the Group. We apply a uniform approach to risk assessment and management across each of the Lite n' Easy entities covered by this statement. The analysis of modern slavery risks in this statement and our risk management plan applies to all reporting entities covered by this statement.

As a centrally managed group, the consultation process among relevant stakeholders, occurs through our standard business practices and our ESG Committee. This collaborative approach ensures that key personnel and stakeholders, responsible for all reporting entities, are actively engaged in the preparation of this joint statement.

## 7. Additional Information

## Mandatory reporting criteria of the Modern Slavery Act

This statement was prepared to meet the mandatory reporting criteria set out under section 16 of the *Modern Slavery Act 2018* (Cth). The table below identifies where each criterion of the Act is disclosed within sections of this statement.

MSA Reference	MSA Criteria	Reference in this Statement
s16. 1(a)	Identify the reporting entity	Page 03
s16. 1(b)	Describe the reporting entity's structure, operations and supply chains	Page 04
s16. 1(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 06
s16. 1(d)	Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Page 9
s16. 1(e)	Describe how the reporting entity assesses the effectiveness of these actions	Page 12
s16. 1(f)	Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 15
s16. 1(g)	Provide any other relevant information	Page 16
s16. 2(b)	Details of approval by the relevant principal governing body or bodies	Page 03