

Petuna Modern Slavery Statement 2024

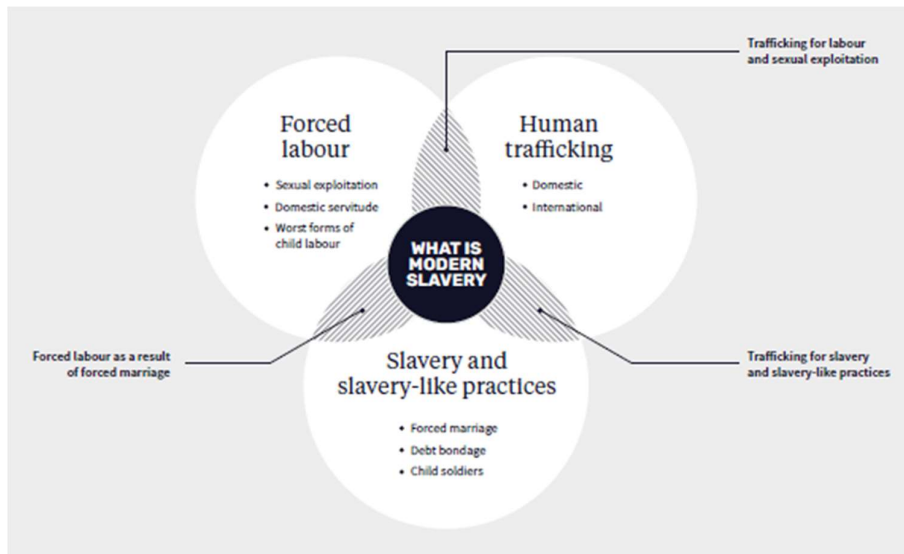
This statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) (“**the Act**”) for Petuna Aquaculture Pty Ltd, which is the relevant reporting entity, and which is referred to in this statement as “**Petuna**”.

This statement covers the financial year ending 30 September 2023.

The Act requires Petuna to lodge a statement for each reporting period which sets out the actions taken by Petuna to assess and address the risks of modern slavery in our business and supply chain functions.

Definition of Modern Slavery

Modern slavery refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, or abuses of power. It takes many forms and is known by many names — forced labour, forced marriage, debt bondage, sexual exploitation, human trafficking, slavery-like practices, forced or servile marriage, and the sale and exploitation of children.



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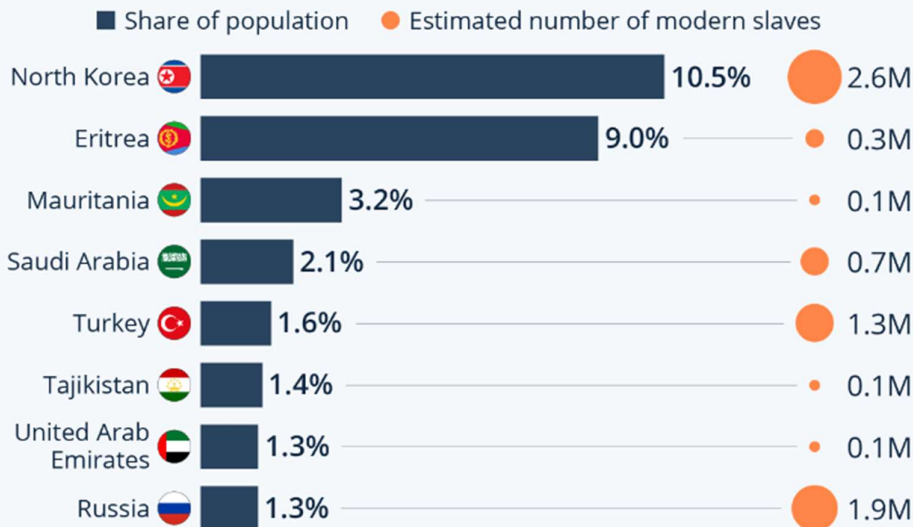
PETUNA AQUACULTURE PTY LTD ACN 009 485 581

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The Hotspots of Modern Slavery

Countries with highest estimated prevalence of modern slavery in 2021*



* Including migrant workers. Combination of 68 representative national surveys and datasets on human trafficking and state-imposed forced labor
Source: Walk Free Foundation

Entities Covered by this Statement

Petuna is comprised of three entities: Petuna Aquaculture Pty Ltd (which is the parent company and reporting entity for the purposes of this statement), Petuna Pty Ltd and Van Diemen Aquaculture Pty Ltd. All three entities have the same governance structure, board of directors and executive senior management team. This statement applies to all three entities and all references to **Petuna**, are references to the three entities.

Petuna Aquaculture Pty Ltd is a wholly owned subsidiary of Sealord Group Limited, a New Zealand company.

Petuna's Organisational Structure and Operations

Petuna is a leading Australian aquaculture company that grows, harvests, and processes premium salmonids for sale to wholesale and retail markets primarily in the domestic market with some export activity. Petuna currently operates a hatchery in Cressy, two aquaculture marine farms in Macquarie Harbour and Rowella, and a production processing plant in East Devonport.

Petuna's head office is in East Devonport, Tasmania, and it operates another corporate office in Launceston, Tasmania. We take pride in being a large employer in the Tasmanian

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aquaculture industry with around 170 employees statewide and a further labour-hire workforce of up to 70 during the year.

We grow premium salmonids, such as Atlantic Salmon and Ocean Trout, and our annual harvest is around 9000 tonnes (live weight). Our hatchery located at Cressy invests significant time, expertise and science developing salmonid families from specially selected broodstock utilising genetic selection principles to produce healthy fish with greater resilience to warming waters that also thrive and grow into quality fish with superior texture, colour, and taste. The growth phase takes place in premium Tasmanian waters at our two aquaculture farms situated in north and west Tasmania, Rowella, and Macquarie Harbour, respectively. The final stage of our operations occurs at our modern processing plant situated in East Devonport, ready for distribution to retail and wholesale markets and ultimately to the consumer.

Petuna's Supply Chain

Petuna sources various products for our operations predominately from local suppliers; however, also some product internationally. Products can vary from ingredients and packaging for the processing facility to fish feed, farm nets, plant and equipment and operating machinery for our marine farms.

Categories of services used by Petuna include, but are not limited to, information technology service providers, distribution logistics, facilities services, and consumables. Most services are sourced locally, primarily within Tasmanian with some interstate consultancy services.

Sealord Australia Pty Ltd, a subsidiary of Sealord Group Limited, markets and sells the majority of Petuna's products.

The Risk of Modern Slavery in Petuna's Operations and Supply Chain

Petuna is committed to producing the highest quality, sustainable and ethically sourced salmonids whilst responsibly maintaining the health and welfare of our people, our fish and the environment in which we operate. Although Petuna's values, policies and practices and the expectations of our people regarding ethical conduct eliminate/mitigate the risk of modern slavery practices in our own workforce, the risk of potential modern slavery practices in the supply chain are always present.

Sourcing specialist capital equipment and product associated with our operations from overseas countries with less developed economies, regulations, and practices, together with indirect entities, that Petuna does not have a direct contractual arrangement (our suppliers supply chains), are assessed as having an increased risk of the potential for modern slavery practices. The number of local suppliers represents 96% of our total supply chain activity.

Actions Taken by Petuna to Assess and Address Risk

Petuna has made significant progress in assessing and addressing the risks of modern slavery throughout our supply chain and operations. Over the past 12 months, we have progressed

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with our supply chain review and have finalised and implemented a Human Rights (HuR) Policy and a Speak Up Policy, which is now published and available.

In February 2024, management representatives from our Macquarie Harbour marine farm completed a trip to India to inspect and audit the operations of our new marine farm net supplier. During the visit, aspects of modern slavery were thoroughly reviewed to ensure compliance with our stringent ethical standards. This on-site evaluation underscores our commitment to maintaining a supply chain free of modern slavery and reinforcing our dedication to ethical business practices.

Petuna has also continued to annually review and update our existing formal policies and documents that promote ethical conduct and form due diligence against and prohibit modern slavery and broader human rights (HuR) practice violations, as well as provide avenues for individuals to report.

Our current relevant policies and documents that contribute to preventing violation of human rights and modern slavery practices include:

- Sealord Group Employee Code of Conduct,
- Sealord Group Speak Up Policy (*new*),
- Petuna Human Rights (HuR) Policy (*new*),
- Petuna Employees Working Under 18 Years of Age Policy,
- Petuna Whistle-Blower Policy,
- Petuna Business Ethics Policy,
- Petuna Supplier Ethical Sourcing Code of Conduct,
- Petuna Recruitment and Appointment Policy,
- Petuna Freedom of Association Policy,
- Petuna Discrimination, Bullying and Harassment Policy,
- Petuna Grievance Policy and Procedure,
- Petuna Managing Underperformance Policy, and
- Industrial Instruments - Enterprise Agreements and Individual Contracts that comply with Australian law and regulations.

Petuna is registered as a supplier with the Supplier Ethical Data Exchange (SEDEX) and undertakes Supplier Member Ethical Trade Audit (SMETA) four pillar third-party compliance audits encompassing labour standards, business ethics, health and safety, and the environment.

Additional third-party compliance audits occur across all our sites in the form of our Best Aquaculture Practices (BAP) accreditation. BAP is the only third-party certification program that encompasses the entire production chain, including our hatchery, processing plant, farm and feed mill. BAP certification is a due diligence compliance process that amongst other crucial business areas, covers worker safety and workplace relations.

To increase and maintain awareness across Petuna, modern slavery education has been included in our induction program which also serves as refresher training every twelve months. Additionally, new and existing key personnel involved in procurement processes have also undergone specific modern slavery awareness training.

Supply Chain Management

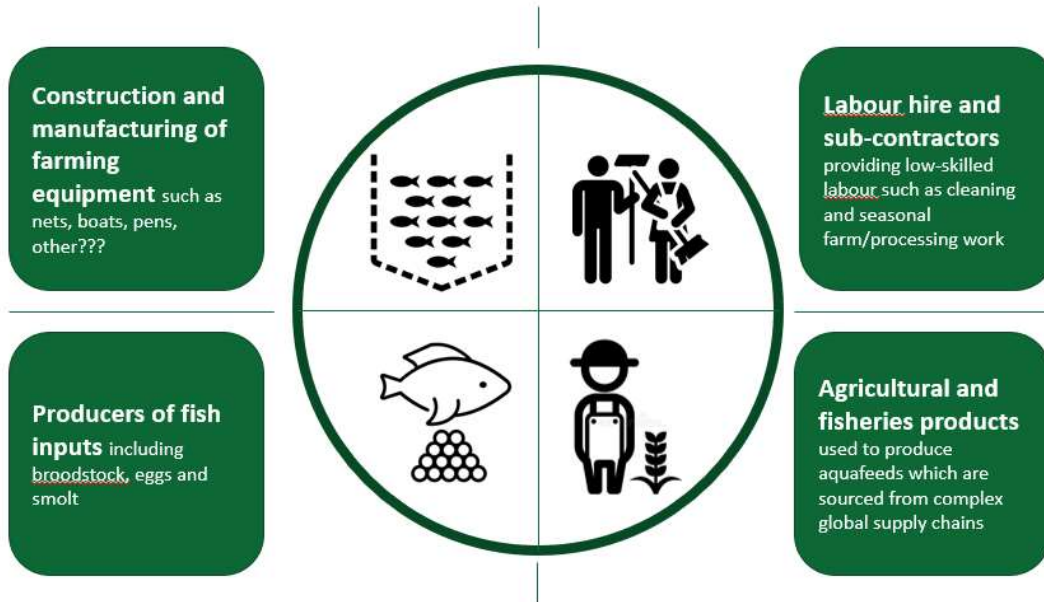
During 2022 Petuna engaged a third-party to review and assess all our suppliers for modern slavery activity risk, determined against relevant criteria originating from the *World Benchmarking Alliance* and the *United Nations Human Rights, Office of the High Commissioner*.

Suppliers that represent a spend of \$200,000 per annum or more were reviewed/assessed for potential risk, utilising accepted HuR modern slavery criteria. A scoring system was adopted which consisted of assessment based on 3 major risk criteria.

Key risk indicator	Example questions related to key risk indicators
Sector and industry:	<ul style="list-style-type: none"> • Is the industry characterised by long and complex supply chains? • Does the industry rely on overseas production? • Is the industry labour intensive? E.g. Construction, cleaning
Products or services:	<ul style="list-style-type: none"> • Does the product have a short life-cycle due to changing seasons (e.g. fresh produce) or consumer demands (e.g. mobile phones)? • Are the raw materials used high-risk for modern slavery? (e.g. fish, agricultural products, textiles) • Is the service undervalued in our society?
Geographic risks:	<ul style="list-style-type: none"> • Are the products sourced from countries with? • Poor governance structures and a weak rule of law • Inadequate labour protection • Corruption or instability

Individual indicator risk score Low = 1 Medium = 2 High = 3	Overall risk score 1-3: Low risk procurement 4-6: Medium risk procurement 7-9: High risk procurement
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The assessment resulted in 9 suppliers being determined as having potential for high risk of modern slavery activities. Petuna’s evaluated potential modern slavery risk areas include:



As part of our supply chain process all new suppliers and renewing suppliers are subjected to our due diligence process before Petuna will enter a contract with them. Supplementary assessment is conducted at Petuna's' discretion and any reservations around business conduct, compliance, and human rights is reviewed and mitigated in partnership with the relevant supplier representative. Suppliers that are considered by Petuna to present a modern slavery risk following due diligence will be either rejected or subjected to continuous monitoring. Where appropriate, Petuna takes necessary actions to terminate supplier arrangements or contracts with any suppliers that do not comply with the supplier code of contract.

Petuna has implemented a two-tier initial supplier assessment process.

Tier 1. Supplier Ethical Code of Conduct as part of our commitment into integrate ethical and socially responsible business practices into all aspects of our business. As part of that code, Suppliers commit that they currently do and will continue to comply with Petuna's ethical sourcing principles and practices. Suppliers acknowledge that Petuna may verify compliance through internal or external assessment mechanisms including but not limited to questionnaires, declarations, request for policies and other documentation validating practice as well as third-party audits. The code includes the following areas of ethical conduct: wages, working hours, harsh and inhumane treatment, discrimination, bullying and harassment, freely chosen employment, child labour, safe working conditions, freedom of association, entitlement to work and recognised immigration.

Tier 2: High Risk Suppliers using the criteria of \$200,000+ spend and assessment against geographic location, products/services supplied, and industry/sector, will complete the self-assessment questionnaire (Australian Government Supplier Questionnaire) and provide supporting documentation, policy and process. Additional evidence of compliance will be

pursued by either provision of documented third-party social licensed audit (SMETA or similar recognised standard) or via Petuna audit where third-party activity is not occurring.

Measuring Effectiveness

Petuna continues to measure the effectiveness of its actions against modern slavery risks by conducting annual internal reviews and participating in third-party compliance audits. We have completed the development of a Human Rights (HuR) policy incorporating modern slavery mitigation. We have continued to pursue evidence/validation of our key suppliers' commitment to modern slavery prevention, including insistence on third-party ethical auditing.

We will continue to explore further mechanisms to assess the effectiveness of actions we undertake to address modern slavery in our operations and supply chain.

Consultation with Associated Entities



As all Petuna entities share the same board and executive/senior management team, consultation occurs automatically, however there is also ongoing consultation with key managers and other personnel that have procurement involvement. Petuna is wholly owned by and engages with Sealord Group Ltd of New Zealand on broader human rights issues and international standards that impact our business.

Future Commitments

Over the next few years our key focus areas to improve our approach to modern slavery will include the following:

- **Supplier Commitment Validation:** Continue to pursue evidence and validation of our key suppliers' commitment to modern slavery prevention, including insisting on third-party ethical auditing.
- **Ongoing Supply Chain Review:** Maintain and enhance our supply chain review processes to ensure continuous monitoring and assessment of modern slavery risks.
- **Training and Awareness:** Develop and implement new training and awareness programs to educate employees and key stakeholders about modern slavery risks and our policies to mitigate these risks.
- **Improved Metrics and Indicators:** Develop new metrics and indicators to better measure the effectiveness of our actions in addressing modern slavery.
- **Stakeholder Engagement:** Enhance consultation processes with entities within Petuna and with Sealord Group Ltd to ensure comprehensive and cohesive approaches to human rights and modern slavery issues.
- **Ethical Sourcing Practices:** Strengthen our ethical sourcing practices by incorporating feedback from audits and assessments and ensuring compliance with our supplier code of conduct.

- **Community and Industry Collaboration:** Collaborate with industry bodies, NGOs, and the community to share best practices and stay informed about emerging risks and strategies to combat modern slavery.

By committing to these actions, Petuna aims to continuously improve our efforts in preventing modern slavery and ensuring ethical and responsible practices throughout our operations and supply chains.

Approval and Authorisation

This statement was approved by the Board of Directors of Petuna Aquaculture Pty Ltd on 29 March 2024.



Rocky Boschman
Managing Director Aquaculture
Petuna Aquaculture Pty Ltd