

SPC GLOBAL LTD

MODERN SLAVERY STATEMENT

1 JULY 2021 TO 30 JUNE 2022

*A GLOBAL AGRIBUSINESS, WITH AUSTRALIAN HERITAGE, DELIVERING INNOVATIVE AND
SUSTAINABLE PRODUCTS TO CUSTOMERS*

MESSAGE FROM OUR CEO AND CHAIRMAN

Millions of Australians have grown up with SPC over the past 100 years. For them, SPC is more than a food company, it is a part of Australia's history and a national icon. Our aim is to preserve this national treasure for another 100 years and beyond, and not only preserve, but to thrive and become an internationally recognised brand and business.



We are committed to continue playing an important role in the Australian economy and manufacturing industry by using local, Australian ingredients, whenever possible, generating jobs and supporting Victoria's Goulburn Valley region.

We consider human and workplace rights – as articulated in the United Nations' Universal Declaration of Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work – to be inviolable. We have a zero-tolerance approach to Modern Slavery of any kind within our operations and supply chain and are dedicated to addressing and eliminating modern slavery risks within our operations and supply chains.

We are pleased to publish this Modern Slavery Statement for 2021 – 2022 Financial Year.

Reporting Entity and Structure

SPC Global Ltd (ACN 633 389 394) is an Australian owned, company, engaged in processing, packaging and canning food products, such as fruit, tomato, baked beans and spaghetti, manufacturing beverages and frozen meals with the following subsidiaries:

- SPC Operations Pty Ltd (ACN 633 532 162);
- The Kuisine Company Pty Ltd (ACN 147 334 101); and
- The Good Meal Company Pty Ltd (ACN 623 746 592)

(each a **Reporting Entity** and all companies together, **SPC**).

The Modern Slavery Statement describes the risk of modern slavery in SPC's own operations and our supply chain for the period from 1 July 2021 to 30 June 2022 (the **Reporting Period**), actions taken by SPC to assess and address the risks and outlines how we evaluate effectiveness of these measures. The term 'modern slavery' as used in this Statement takes the meaning as given to it in the *Modern Slavery Act 2018* (Cth).

The Process of Consultation

This statement covers each Reporting Entity and was prepared in consultation with the Executive Team led by the Chief Executive Officer and the Risk and Compliance Committee, both functions shared by the Reporting Entities. All the Reporting Entities also have the same expectations, policies and a common supply chain.

The Risk and Compliance Committee oversees management of the company's risk management framework, including managing the risk of modern slavery in SPC Operations and Supply chain, and is co-chaired by SPC's General Counsel and the Head of Health, Safety and Environment. The Risk and Compliance Committee reports to the SPC's Chairperson and the Board of Directors.

The stakeholders were provided with drafts of this statement for review and commentary during the consultation process. The final copy of the Modern Slavery Statement was tabled before the Board on 20 December 2022 and approved by the Board on 20 December 2022.

Introduction to SPC

SPC is a unique 100-year-old Australian brand and is the oldest and the last Australian owned fruit and vegetable processor in Australia. We have been putting food on the tables of Australians since 1918 – whether that’s Aussie grown stone fruit, tomatoes, or other iconic Aussie’s favourites such as our SPC Baked Beans and Spaghetti.

Recently we have added the Kuisine Company and to our business portfolio. The Kuisine Company is one of Australia’s leading producers of high quality frozen prepared meals for the retail market, and the Good Meals Company is a registered NDIS Meal Provider dedicated to preparation and home delivery of the tastiest meals to the people with disabilities, elderly or the people who are simply in need of a tasty and nutritious meals delivered to their door.

Our goal at SPC is ‘Creating better food for the future’. This goal is based on our Values, which form foundation of our corporate policies and procedures and underpin our commitment to conduct our business with integrity and in an ethical and transparent manner.

Our Brands and Products



We manufacture and sell a range of food products under the portfolio of well- loved, household brands. SPC, Goulburn Valley and Ardmona are the three of Australia’s most recognised and trusted food brands in our portfolio.

SPC also supply a range of products under the Provital, Pomlife, Helping Humans, the Good Meal Co brands. We manufacture and sell products under the belief that the simple act of enjoying delicious food contributes greatly to person’s morale and better health. SPC’s products are currently sold in Australia, New Zealand, the Asia Pacific, Japan, Canada and USA with plans in place to grow its business both domestically and internationally.

Operations and Supply Chain

As of the end of the Reporting Period, SPC employed 441 permanent employees and between 150 to 500 seasonal employees, engaged at the harvest and peak production times.

SPC's head office is located in Melbourne and its largest manufacturing site is located at Shepparton in the Goulburn Valley region of Victoria. The Shepparton site includes the manufacturing facility, National Distribution Centre (NDC), quality control and testing laboratories, training facilities, conference facilities and administration offices. SPC also operates manufacturing facility in Ardmona, which is used for the manufacture of pomegranates and Emu Plains in NSW for manufacture of high quality frozen prepared meals.

SPC produces a range of fruit and vegetable products, including processed deciduous (tree-ripened) fruit, tomatoes, beans and pasta products. Our growers and suppliers are critical partners for our business. We believe collaboration and innovation throughout our supply chain are essential.

Over 90% of the ingredients used by SPC are grown in Australia, locally in the Goulburn Valley and processed at our Shepparton facility. Our main goal is to keep SPC Australian owned and to support our local growers and Shepparton community. Nonetheless, we do import some produce from time to time, when we cannot source them locally.



Our operations are further supported by many indirect suppliers, including labour hire workers, cleaning and security services, transport and logistics providers, waste disposal companies and professional services such as advertising agencies.

At the end of the Reporting Period, SPC collaborated with approximately 163 goods and services suppliers.

Risk of Modern Slavery Practices in Our Operations

SPC adopts a risk-based approach to modern slavery due diligence in our operations and supply chain. We primarily focused on the human rights of our employees and contractors, along with the human rights of those employed by our suppliers. As of this Reporting Period, SPC has identified the actual risk of modern slavery in our own operations as low. This finding is based on the following initiatives and measures:

- Most of SPC team members are employed directly by SPC and their employment contracts are governed by and compliant with the relevant Federal and State law.
- SPC employs a team of People and Culture specialists who oversee compliance with the relevant regulatory requirements concerned with the working conditions and pay for our team members.

- SPC team members have high union engagement and membership and are free to negotiate collectively working conditions and if required involve third parties, such as unions in such negotiations. Our employees and contractors are free to choose whether or not to join a union or employer association or to participate in industrial activities which they organise.
- SPC monitors risk of modern slavery in our operations through the regular employment engagement surveys and assessment of grievances raised by our team members through the People and Culture team and 24 hours help line.
- SPC gives employers, employees, and independent contractors the freedom to choose whether to join a union or employer association or to participate in industrial activities which they organise.

Sedex Ethical Trade Audits



We are an A/B member of SEDEX, one of the world's leading ethical trade data platforms, focused on improving the monitoring of working conditions in global supply chains. We use SEDEX risk ratings, SAQ and audit methodologies to inform our ethical sourcing approach.

During this reporting period we conducted SMETA (Sedex Members Ethical Trade Audit) audit at our largest manufacturing site – Shepparton. The SMETA standard is aligned with the Ethical Trading Initiative (ETI) Base Code, and covers labour standards, business ethics, health and safety and environmental practices. The audit identified minor non-

conformances, which have since been addressed, none of which concerned a risk of modern slavery or forced labour practices at our Shepparton site. The results of the audit validated our confidence in the operations of and business practices engaged in by the site.

Risk of Modern Slavery Practices in our Supply Chain

SPC has undertaken a risk-based approach to addressing the risks of modern slavery in our supply chain. Most of the goods and services that we purchase, are from Australian suppliers, in keeping with policy to source locally where possible. All SPC suppliers are required to comply with our [Supplier Code of Conduct](#), which promotes, among others, principles of diversity and non-discrimination, freedom of association, prohibit the practice of forced and bonded labour, slavery and human trafficking and child labour.

Over 90% of the ingredients used by SPC are grown in Australia, locally in the Goulburn Valley and processed at our Shepparton facility.

However, we identified that in some circumstances, we also source:

- pineapples and mangoes from SPC's tropical manufacturing source in Thailand;
- berries from China, Europe, New Zealand and Chile (due to short supply in Australia); and
- beans from Canada.

Our growers are contractually required to comply with the Australian legislation in their operations. SPC also monitors risks of modern slavery by requiring all growers to provide an annual declaration

that they have paid as a minimum the award rate for all employees in the production and harvest of fruit and vegetables delivered to SPC. Growers are also required to notify SPC of any changes in the details provided in their annual declaration.

SPC also conducted an analysis and review of our supply chain by using Sedex platform, and categorised each supplier as either low, medium, or high risk based upon several factors including: (a) geographical location based upon known high risk countries; and (b) the type of goods and services supplied by each supplier.

Our review did not result in high-risk classification for any of the suppliers or identified direct examples of the modern slavery practices in our supply chain within the Reporting Period. As a result of the initiatives and assessment described above, SPC identifies risks of modern slavery in our supply chain as being low. However, we do recognise that we must continue monitoring the risk and are doing so through the ongoing due diligence processes.

Actions taken to assess and address the risk of Modern Slavery

In addition to the risk assessment activities described in the previous sections, SPC's practices and initiatives concerned with social compliance are guided by our commitment to provide a healthy and safe work environment for our people. Our objective is to maintain a culture of zero tolerance of any harm and injury to our employees, contractors, and visitors. We encourage our employees to be guided by our Values and Policies detailed below, aimed at ensuring fair and equitable treatment of all our team members and suppliers.

SPC publicises our Values and Policies by way of training programs and as a part of induction of SPC new team members.



Safety first



Open for business



Risk smart



Care about our communities and environment



Agility and speed



Roll our sleeves up

SPC Code of Conduct

The [Employee Code of Conduct Policy](#) outlines SPC's commitment to a safe, harmonious and professional working environment, which is free of discrimination, bullying and harassment. The SPC Employee Code of Conduct applies to all employees, agents, contractors, subcontractors, consultants, and temporary staff of SPC.

All new and existing staff and employees of SPC are required to complete training on the SPC Code of Conduct and related human resource and compliance policies.

Supplier Code of Conduct

SPC expects its customers, contractors, suppliers, and their sub-tier suppliers to adhere to the same high standards and values when conducting their business and business with SPC. Suppliers should adhere to all applicable laws and regulations and use their best efforts to comply with the principles of our [Supplier Code of Conduct](#). SPC will sell or purchase goods or services and engage and contract with

Suppliers based on value, quality, and compliance with SPC standards and requirements. The Supplier Code of Conduct provides an opportunity for SPC to communicate its position on the ethical practices and set clear expectations of Suppliers, including consequences where those are intentionally disregarded.

Expect Respect at SPC

In 2022 we launched [Workplace Respect Standard](#) and Expect Respect online awareness program which outlines SPC's commitment and expectations that enable a safe and respectful working environment, free of discrimination, bullying and harassment. Everyone should expect respect and SPC, this is at the heart of our value, Safety First.

SPC is an equal opportunity employer - Our aim is to create a respectful workplace where equal opportunity exists at all phases of the employment lifecycle, regardless of gender, ethnicity, disability, sexual orientation, and age – and we run various programs and initiatives across the business to ensure we achieve this goal.

We are creating a culture and environment where our people have the opportunity to excel and feel valued for their contribution and achievements.

Grievance Policy

If SPC team member has a grievance (complaint), [SPC's Grievance Policy and Procedure](#) should be followed. This policy includes formal and informal procedures to effectively and equitably resolve a complaint.

Whistleblower Policy

We also have a [Whistleblower Policy](#) which provides a confidential process for our staff, employees and contractors to report concerns, including modern slavery concerns. Protection is afforded to such reports to ensure there is an avenue to raise concerns without fear of retribution.

Health, Safety and Wellbeing

At SPC, we are committed to providing a healthy and safe work environment that supports the wellbeing of our people. Continuously improving health, safety and wellbeing is our priority. We believe everyone plays a role in making SPC a safe place to work and together we will make a difference to the health, safety, and wellbeing of our people.

Our [Health, Safety and Wellbeing Policy](#) and framework sets our commitments and standards of work with respect to health and safety and wellbeing.

Employee Assistance Program

LifeWorks is SPC's Employee Assistance Program (EAP) provider. LifeWorks have skilled clinicians available 24x7 to confidentially discuss any concerns our employees or your immediate family may be facing. The EAP can be contacted 24 hours per day, 7 days per week on 1300 361 008 at no cost to you. The EAP offers timely, qualified assistance and support to help manage all of life's complexities.



Measuring the effectiveness of our actions

We assess the effectiveness of our actions in several ways, including through regular reporting to the SPC Board of Directors and ELT on the topics covered in this statement.

We are currently in the process of developing a robust process to further measure effectiveness of our actions.

The Road Ahead

In the spirit of holding ourselves to the standards we expect of our suppliers, we committed to complete SAQs for the remainder of SPC sites across Australia in the next reporting period.

SPC is on the continuous journey to make a real and meaningful impact on human rights and wellbeing. We are unwavering in our commitment to continually improve our operations and supply chain processes and practices. Some actions we anticipate taking in future reporting periods include:

- Implementing formal training on modern slavery to skill up relevant employees.
- Reviewing our policies and procurement processes to establish clear guidelines for modern slavery awareness and risk assessment.
- Actively and regularly engaging with our suppliers and promoting our whistleblowing platform to suppliers as a safe, anonymous way to report concerns, including in relation to modern slavery.
- Developing a procedure for responding to modern slavery cases that we may become aware of as part of the continuous due diligence process.



Robert Giles
CEO



Hussein Rifai
Chairman

Approval

This Statement was approved by the Board of Directors on 20 December 2022



Hussein Rifai
Chairman

Disclosure Matrix

	Mandatory Criteria	Disclosure reference (Page number)
1	Identify the reporting entity	2-3
2	Describe the reporting entity's structure, operations, and supply chains	3-4
3	Describe the risks of modern slavery practices in the operation and supply chains of the reporting entity and any entities it owns or controls	4-5
4	Describe the actions taken by the reporting entity and any entity it controls to assess and address these risks, including due diligence and remediation processes.	6-7
5	Describe how the reporting entity assesses the effectiveness of these actions	7
6	Describe the process of consultation with any entities the reporting entity owns or controls.	2