

SPC GLOBAL LTD

JOINT MODERN SLAVERY STATEMENT

1 JULY 2022 TO 30 JUNE 2023

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

Modern Slavery Statement 2022-2023

MESSAGE FROM OUR CEO – Neil Brimacombe

SPC has had a longstanding association with Australia. Australians have grown up with SPC over the past 100 years. SPC is more than a food company; it is a part of Australia's history and a national icon.

Our objective is clear — not just to preserve this cultural legacy but to see it succeed locally and globally for another hundred years. We are committed to continuing to play 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.

As a responsible corporate entity, we believe the protection of human rights is fundamental to good business and have a zero-tolerance approach to modern slavery of any kind within our operations and supply chain. From stringent quality controls to fostering relationships with our growers and suppliers, we are committed to upholding high ethical standards throughout our operations and supply chain.

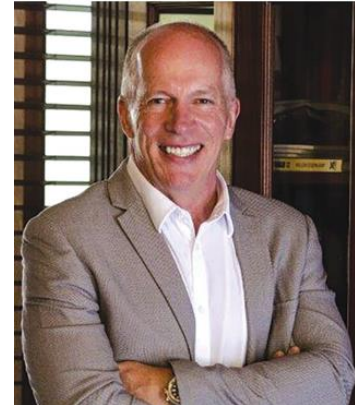
Guided by internationally recognized standards such as the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the principles outlined in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, we ensure that our practices align with global expectations.

We are pleased to present the Modern Slavery Statement for the 2022–2023 financial year, emphasizing SPC's commitment to eradicating modern slavery within our operations and supply chain. This document also outlines our ambitions and plans for the years ahead.

This Statement was approved by the SPC Global Ltd Board of Directors on 20 December 2023



Neil Brimacombe
Chief Executive Officer



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, tomatoes, baked beans, and spaghetti. It also manufactures frozen meals and operates with the following subsidiaries:

- SPC Operations Pty Ltd (ACN 633 532 162)
- Frozen Ready Meals Pty Ltd (ACN 643 931 677)

(Reporting Entities)

Frozen Ready Meals Pty Ltd (ACN 643 931 677) is engaged in manufacturing frozen meal, it is a subsidiary of SPC Global Ltd (ACN 633 389 394) and operates with its own three subsidiaries: The Gluten-Free Meal Company (ACN 616 025 211), The Kuisine Company Pty Ltd (ACN 147 334 101), and The Good Meal Company Pty Ltd (ACN 623 746 592).

Each Reporting Entity is a reporting entity within the *Modern Slavery Act 2018 (Cth)* (**the Act**) and collectively, they form 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 2022 to 30 June 2023 (**the Reporting Period**). It outlines actions taken by SPC to assess and address the risks and explains how we evaluate the effectiveness of these measures. The term 'modern slavery,' as used in this Statement, takes the meaning given to it in the Act.

The Process of Consultation

This statement, encompassing each Reporting Entity, was prepared by the Human Rights and Sustainability Committee in consultation with the Executive Team and the Chief Executive Officer, overseeing functions shared by all the Reporting Entities.

The Human Rights and Sustainability Committee, co-chaired by the General Legal Counsel and the Head of Health, Safety, and Environment, comprises senior members of the SPC Team, the Head of Procurement, and the General Manager of People and Culture.

Meeting bi-monthly, the committee ensures SPC's compliance with the Act and monitors the risk of modern slavery in our operations and the supply chain. As a sub-committee of the Audit & Risk Management Committee, it reports directly to the SPC Board of Directors.

The Directors and the Executive Team of each Reporting Entity were provided with drafts of this statement for review and commentary during the consultation process. The final copy of the Modern Slavery Statement was presented before the Board on 20 December 2023 and approved by the Board on the same date.

Introduction to SPC

SPC, a cherished 100-year-old Australian brand and is the oldest and last Australian-owned fruit and vegetable processor. Since 1918, it has been bringing a diverse array of Aussie-grown produce to tables across the country, including stone fruit, tomatoes, and beloved favourites such as our SPC Baked Beans and Spaghetti.

In recent years, we've expanded our commitment to providing quality food options with the addition of The Kuisine Company Pty Ltd (**The Kuisine Company**) and The Good Meal Company Pty Ltd (**The Good Meal Company**) to our family. The Kuisine Company, a leading producer of high-quality frozen prepared meals for the retail market, and The Good Meals Company, a registered NDIS Meal Provider, extend our mission by preparing and delivering delicious meals to individuals with disabilities, the elderly, and those in need of flavourful and nutritious options at their doorstep.

At SPC, our overarching goal is to 'Creating better food for the future.' Anchored in our Values, which form the cornerstone of our corporate policies and procedures, this objective reflects our unwavering commitment to conducting business with integrity and in an ethical and transparent manner. Together with The Kuisine Company and The Good Meals Company, we continue to shape a future where quality and care go hand in hand, providing nourishing meals for all Australians.

SPC Values



Safety first



Open for business



Risk smart



Care about our communities and environment



Agility and speed



Roll our sleeves up

Our Brands and Products



We manufacture and market a diverse range of food products under the umbrella of cherished household brands. SPC, Goulburn Valley, and Ardmona stand as three of Australia's recognisable and trusted brands within our portfolio. The diverse product range at SPC includes processed deciduous (tree-ripened) fruit, tomatoes, beans, and pasta products.

In addition to our flagship brands, SPC supply products under the Provital, Pomlife, and the Good Meal Co brands. Our philosophy centres around the belief that the simple pleasure of delicious food significantly contributes to an individual's morale and overall well-being.

SPC's products are available in Australia, New Zealand and the Asia Pacific.

Operations and Supply Chain

SPC is dedicated to promoting a workplace where our employees feel safe, supported, and valued. We actively promote inclusivity in our working environment and hiring practices, placing a strong emphasis on gender diversity and equal opportunities for all employees.

SPC's headquarters are in Melbourne, and its largest manufacturing site is situated in Shepparton, within the Goulburn Valley region of Victoria. The Shepparton facility comprises a manufacturing plant, the National Distribution Centre (NDC), quality control and testing laboratories, training facilities, conference spaces, and administrative offices. Additionally, SPC operates manufacturing facilities in Ardmona, dedicated to the production of pomegranates, and in Emu Plains, NSW, where high-quality frozen prepared meals are manufactured. SPC also employs quality specialists based in Thailand and a Sales Team based in Singapore.



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, with a primary focus on the human rights of our employees, contractors, and those employed by our suppliers.

As of the conclusion of the Reporting Period, SPC maintained a workforce comprising 441 permanent employees and a variable number of seasonal employees ranging between 150 and 500. The seasonal staff are primarily engaged during harvest and peak production times.

During this Reporting Period, SPC assessed the actual risk of modern slavery in our operations as low. This determination is based on the following initiatives and measures:

- The majority of SPC team members are directly employed by SPC, and their employment contracts adhere to and comply with relevant Federal and State laws.
- SPC maintains a dedicated team of People and Culture specialists responsible for overseeing compliance with regulatory requirements related to the working conditions and pay of our team members.
- SPC team members actively engage with and often hold memberships in unions, affording them the freedom to collectively negotiate working terms and conditions. If necessary, third parties, such as unions, can participate in these negotiations.
- SPC monitors the risk of modern slavery in our operations through regular employment engagement surveys and the assessment of grievances raised by team members. The People and Culture team, along with a 24-hour anonymous whistleblower helpline, facilitates this process.
- SPC respects the freedom of choice for employers, employees, and independent contractors regarding their decision to join a union or employer association or to participate in organized industrial activities. This commitment to freedom of choice is embedded in our approach to labour relations.

Over 90% of the ingredients utilised by SPC are sourced from Australia, predominantly from the Goulburn Valley, and processed at our Shepparton facility. While our primary objective is to maintain SPC as an Australian-owned entity and support local growers and the Shepparton community, there are instances when we import produce due to unavailability from local sources.

Our operational framework is enhanced by numerous indirect suppliers, encompassing cleaning and security services, transport and logistics providers, waste disposal companies, and professional services such as advertising agencies.

As of the conclusion of the Reporting Period, SPC maintained collaborations with approximately 2,000 goods and services suppliers. Additionally, our close partnership extended to 130 growers, reflecting the integral role they play in our supply chain and the overall success of our operations. This collaborative approach underscores our dedication to fostering strong relationships and ensuring the sustainability of our business ecosystem.

SEDEX Ethical Trade Audits

We are proud to be an A/B member of SEDEX, a leading global ethical trade data platform dedicated to enhancing the monitoring of working conditions in global supply chains. Our commitment to ethical sourcing is guided by SEDEX risk ratings, Supplier Assessment Questionnaires (SAQ), and audit methodologies. We conduct SMETA audits at our factories every two calendar years.

In the 2021-2022 Reporting Period, we conducted a SMETA audit at our largest manufacturing site – Shepparton. The audited facilities included the manufacturing facility and the National Distribution Centre. The SMETA standard aligns with the Ethical Trading Initiative (ETI) Base Code and covers labour standards, business ethics, health and safety, and environmental practices. The audits identified no nonconformances related to modern slavery or forced labour practices at our Shepparton site.

During the next Reporting Period, we will complete SMETA audits at both the Shepparton and Emu Plains manufacturing sites.

Risk of Modern Slavery Practices in our Supply Chain

SPC collaborates with approximately 2,000 goods and services suppliers. Our operational framework encompasses cleaning and security services, transport and logistics providers, waste disposal companies, and professional services such as advertising agencies.

Additionally, our close partnership extended to 130 growers. Over 90% of the ingredients utilised by SPC are sourced from Australia, predominantly from the Goulburn Valley, and processed at our Shepparton facility. While our primary objective is to support local businesses and growers and the Shepparton community, there are instances when we import produce due to unavailability from local sources.

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.

To assess the risks of modern slavery across our supply chain, SPC conducts an analysis and review using the SEDEX platform. SPC requires our suppliers to grant access to the Supplier’s Self-Assessment Questionnaire (SAQ) and SMETA information. Each supplier is categorized as low, medium, or high risk based on several factors, including geographical location (with a focus on known high-risk countries), the type of goods and services supplied.

SPC maintains a close relationship with its growers, some of whom have been cultivating produce for generations. To mitigate the risks of modern slavery in our growers' network, SPC mandates that all growers working for us make a declaration confirming their compliance with the Act. Additionally, SPC requires growers to ensure payment of at least the minimum award rate for all seasonal workers involved in the production and harvest of fruits and vegetables delivered to SPC.

Our review during this Reporting Period did not result in a high-risk classification for any of the suppliers, and no direct examples of modern slavery practices were identified in our supply chain. SPC maintains a close relationship with its growers, some of whom have been cultivating produce for generations. However, we acknowledge the importance of ongoing monitoring and continue to do so through our established due diligence process.

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 initiatives related to social compliance are guided by our commitment to providing a healthy and safe work environment for our people. Our objective is to maintain a culture of zero tolerance for any harm and injury to our employees, contractors, and visitors. We encourage our employees to be guided by the policies detailed below, aiming to ensure fair and equitable treatment of all team members and suppliers.

SPC Employee Code of Conduct

The [Employee Code of Conduct Policy](#) outlines SPC's commitment to a safe, Inclusive, and professional working environment, 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 at SPC are required to complete training on the SPC Code of Conduct annually.

Supplier Code of Conduct

The Supplier Code of Conduct provides an opportunity for SPC to communicate its position on ethical practices and set clear expectations for suppliers wishing to work with SPC. We incorporated Modern Slavery clauses into all supply agreements so that all new and renewed contracts include Modern Slavery provisions to help ensure, from a contractual perspective, that our suppliers share our values and are committed to eliminating Modern Slavery from their own supply chains.

Suppliers contracted with SPC are obligated to make their best efforts to comply with the principles outlined in our Supplier Code of Conduct or their own Code of Conduct if it is based on the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the principles outlined in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Expect Respect at SPC

In 2022 we launched [Workplace Respect Standard](#) and Expect Respect 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.

This program has now been rolled out to all employees within the SPC family and is part of every employee's onboarding experience. This program will continue to be the centre of how we expect everyone is treated at SPC, winning the hearts and minds, and providing a safety networking community. It will continue to roll out on an ongoing basis for all employees across all sites with face-to-face workshop sessions to launch in next 12 months.

SPC is an equal opportunity employer. Our aim is to create a respectful and inclusive workplace where equal opportunity exists at all phases of the employment lifecycle, regardless of attributes including gender, ethnicity, disability, and age. SPC runs 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 an SPC team member has a grievance (complaint), they should follow SPC's Grievance Policy and Procedure. This policy includes both formal and informal procedures to resolve a complaint effectively and equitably.

Whistleblower Policy

We also have a [Whistleblower Policy](#) that establishes a confidential process for our staff, employees, and contractors to report concerns, including those related to modern slavery. Protection is provided to individuals making reports to ensure there is an avenue to raise concerns without fear of retribution.

During the Reporting Period, SPC received no complaints concerning the risk of modern slavery in our operations or the supply chain.



At SPC, we are dedicated to providing a healthy and safe work environment that prioritizes the wellbeing of our people. Continuous improvement is integral to our safety practices, and we believe that everyone plays a role in making SPC a safe place to work, both physically and psychologically. Safety is our top priority for everyone, and together we can make a significant impact on the health, safety, and wellbeing of our people.

Employee Assistance Program

Telus Health is SPC's Employee Assistance Program (EAP) provider. Telus Health has skilled clinicians available 24x7 to confidentially discuss any concerns that our employees or their immediate family may be facing. The EAP can be contacted 24 hours per day, 7 days per week at no cost to you, by calling 1300 361 008. 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 regular reporting to the SPC Board of Directors and the Executive Leadership Team (ELT) on the topics covered in this statement. Currently, we are in the process of developing a robust process to further measure the effectiveness of our actions.

The Road Ahead

SPC is on a 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. In future reporting periods, some actions we anticipate taking include:-

- Implementing formal training on modern slavery to equip 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 those related 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.

Disclosure Matrix

	Mandatory Criteria	Disclosure reference (Page number)
1.	Message from SPC Chief Executive Officer	2
2.	Identify the reporting entity	2
3.	Describe the reporting entity’s structure, operations, and supply chains	4
4.	Describe the risks of modern slavery practices in the operation and supply chains of the reporting entity and any entities it owns or controls	5-6
5.	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.	7-9
6.	Describe how the reporting entity assesses the effectiveness of these actions	10
7.	Describe the process of consultation with any entities the reporting entity owns or controls.	3