

2023

# Modern Slavery Statement





## Introduction

The N&A Group and its subsidiaries and controlled entities are committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible ethical operations.

The N&A Group's Code of Conduct provides an ethical and legal framework for all our employees. Our Modern Slavery Assessment aligns to the principles of the Code of Conduct and applies to all businesses.

The N&A Group has a zero-tolerance approach to modern slavery, and we are committed to respecting human rights and acting ethically and with integrity in all our business dealings and relationships.

Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains is one of our key focus areas.

We are issuing this statement pursuant to the Australia Modern Slavery Act, which requires the N&A Group and certain of its subsidiaries to disclose efforts to ensure that modern slavery is not taking place in our supply chains and business operations.

This is our first statement and covers our 2021 to 2022 financial year reporting period. It aims to summarise our assessment of the risks in our operations and supply chains and outline the actions we will take to address those risks.

Throughout this statement, we reference "modern slavery," which includes slavery, servitude, forced or compulsory labour, debt bondage, wages and benefits, deceptive recruiting for labour or services, child labour and human trafficking.

## OUR ENTITIES



## Our Entities

This statement applies to

- The N&A Fruit Distributors Pty Ltd 31 000 050 448  
(Including APFC Exports, Pacific Fruit Brokers and Organics Direct Produce)
- Gocup Pastoral Pty Ltd 11000079103
- N&A Administration Pty Ltd 93620159220
- N&A Operations Pty Ltd 97620162094
- N&A Rural Holdings Pty Ltd 34659786731

collectively referred to in this statement as **'The N&A Group, or 'The Company'**.

The above entities are managed collectively under the same policies procedures and guidelines and as such we have decided to provide a joint statement. This statement is submitted on behalf of and prepared in consultation with all of the related entities named above.

## Strategy

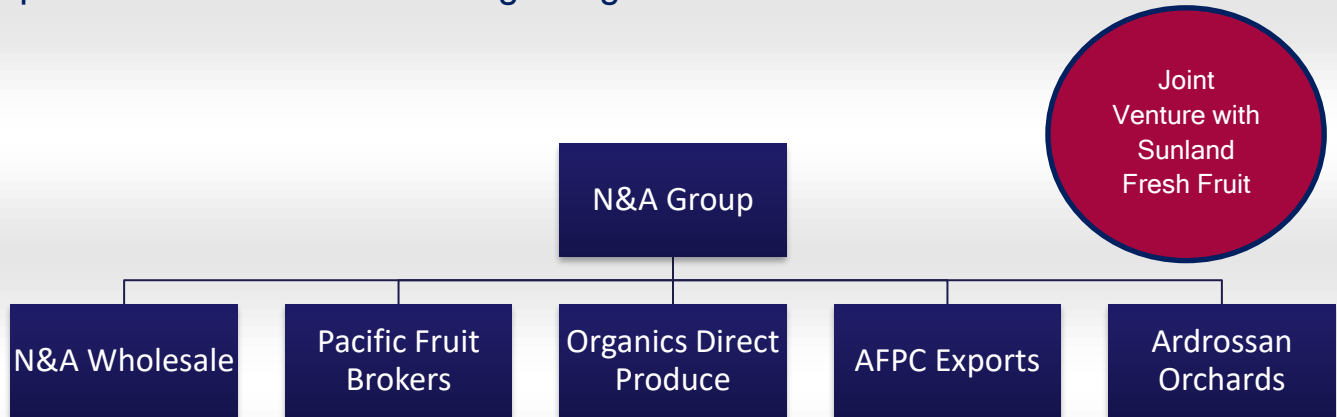
For over 60 years the N&A Group have been stewards of the earth, tree and fruit bowl, part of the supply chain providing homes across Australia with the freshest, tastiest produce. The corporate head office for the group is in Sydney, NSW Australia. The Group's strategy is based on management's vision for growing and sourcing the finest fresh fruit and vegetables in Australia.

The six divisions of the N&A Group make us one of the most vertically integrated grower-led suppliers of fresh produce in Australia.

The success of our strategic goals is dependent on our partners, suppliers, and growers meeting our high ethical and human rights standards. Any new or existing supplier/growers are required as part of assessment to agree to our Modern Slavery Act Policy.

## Structure & Operations

The governance of the N&A Group is across Australia (AU). Our Australian operations fall into the following categories



## Risks Of Modern Slavery Practices

Although the N&A Group strives to mitigate and prevent Modern Slavery within our operations, we recognise that there are potential risks in our supply chain and diversity of stakeholders.

Types of Modern Slavery Risks associated with the horticulture industry and the geographic spread of the business have been identified as follows:

1. Forced labour
2. Debt Bondage
3. Deceptive recruiting for labour or services
4. Child Labour
5. Unsafe working conditions
6. Wages and Benefits

In the horticulture sector, the above-mentioned types of Modern Slavery have been identified owing to high dependence on migrant workers. Many of these workers encounter language barriers which potentially inhibit their awareness of their rights, exposing them to the risks of Modern Slavery. The sector relies on these migrant workers for specific tasks that are seasonal in nature, primarily

## Modern Slavery Statement

picking and packing. They are hired on a casual and/or temporary basis, directly or through a labour hire agency.

The N&A Group has strict policies, procedures and controls to ensure compliance with the applicable local requirements for all its direct employees and hence the risk of modern slavery occurring is low. However, the N&A Group acknowledges that it depends on the widespread support from supply chain partners for supply of produce and services to be able to successfully trade and thrive. These may include providers of other goods and services of cleaning, security, transport, freights, etc.

This will inform our future actions and assist in developing strategies and practices to reduce the risk.

## Addressing Risks

In response to the outlined risks of modern slavery in the N&A Group operations, the N&A Group is committed to the implementation of the following actions. The N&A Group is a member of Sedex, a supplier data exchange online platform focused on the sharing of company information including work health and safety, business ethics and environmental management. As such we utilise Sedex tools and services to manage our operations and supply chain risks. The N&A Group is committed to utilising Sedex tools and services for all existing suppliers and the onboarding of all new suppliers to major domestic retailers, to provide assurance of supplier actions towards mitigating and preventing modern slavery.

The N&A Group will continue to undertake SMETAs (Sedex Member Ethical Audits) at our main warehouse and farm locations. The N&A Group maintains an approved supplier program which involves internal auditing through site visits and our Supplier Code of Conduct. The N&A Group directly employs workers in all of our locations where possible. Due to seasonal demands across our business, we partner with labour providers.

To ensure good labour practices and working conditions, we have internal management systems which include reviewing documentation including licences and regular internal auditing to ensure maximum visibility and compliance.

## Modern Slavery Statement

The N&A Group has various company policies that outlines our commitment to business conduct and ethics. These include our: Whistle blower Policy, Code of Conduct and Ethical Policy, Modern Slavery Act Policy which includes child labour policy, illegal labour policy, wages and benefits, and discrimination policy. These policies are reviewed annually.

We aim to ensure all staff are aware of the company's commitment to responsible sourcing. This will involve:

- including modern slavery awareness training in all new-employee inductions
- specialised training for our compliance department employees
- inclusion of business ethics as a board topic in executive and stakeholder board meeting

The N&A Group is committed to review these actions and their effectiveness in mitigating and preventing modern slavery annual reviews and in future risk assessment.

## Assessing Outcomes

The N&A Group is committed to reviewing our actions taken to mitigate modern slavery through our annual reporting mechanism. This will include annual review and risk assessment of modern slavery practices at an executive and board level, annual audits, annual policy review, third party audits, annual labour hire provider audits, consultation with employees for regular engagement and feedback, and working with our suppliers.

## Conclusion

The N&A Group is committed to continuous investigation into modern slavery practices across our business and improvement of our policies and processes to combat those risks. We will continue to work in partnership with our suppliers and consult across our business to further our awareness of risks and continue to develop actions with a goal of eliminating modern slavery.

This statement has been approved by the Directors of the N&A Group.

**Ian and Rob Cathels**

**Directors**

March 2023

