



---

## LAMANNA PREMIER GROUP Modern Slavery Statement

### 1. Introduction

LaManna Premier Group Pty Ltd (LPG) is committed to the practice of good corporate governance and adhering to the highest ethical standards, complying with the applicable legal obligations including and without limitation, the Modern Slavery Act 2018 (Aust) (the Act).

We will not tolerate any forms of coercion, deception, threat, or worker exploitation that undermine the individual and collective freedom of the workforce within our business and supply chain.

LPG has prepared a Modern Slavery Statement for the reporting period, financial year ending 30 June 2020, in accordance with sections 14 and 16 of the Act, and for the purposes of outlining our approach to ensure that the LPG has robust frameworks, operating standards and processes in place to minimise the risk of Modern Slavery in our business operations and supply chain.

LPG's Modern Slavery Statement is applicable to the LaManna Premier Group (ABN: 87 004 843 556) and its wholly owned subsidiaries.

### 2. About Us

LPG is one of Australia's largest, and privately owned fresh produce supply chain companies, providing both its domestic and overseas customers with a single source of supply across a diverse range of fruit and vegetable categories.

Our farming and distribution operations, coupled with major and independent retailer relationships, ensure we reach Australian households with good quality, healthy, fresh produce.

The Group's farm production capacity and grower network spans all Australian States. LPG sales and distribution operations include climate-controlled distribution services, packing and advanced ripening facilities, and central market Trading operations in every State and Territory of Australia, excluding Tasmania and the ACT.

LPG employ over 600 people directly and through third party labour hire providers across our national Group farming and distribution operations.

### 3. Understanding our Supply Chain Risks

LPG's supply chain includes the production, sourcing, and distribution of fresh produce from farm to major and independent retailers nationwide and international export of Australian fresh produce via freight forwarding.

Our major suppliers of products and services, almost all Australian, with less than 5% international suppliers, include;

- Growers- direct and third-party suppliers of fresh produce
- Market Agents – Third party suppliers of fresh produce
- Transportation - road, air and sea freight
- Packaging
- Labour

LPG has an established Approved Supplier Policy and Program which requires suppliers to acknowledge that they comply with LPG's ethical sourcing practices. The plan is to update the Policy to include specific reference to Modern Slavery and distribute to new and all existing suppliers. LPG has a zero tolerance for all forms of Modern Slavery, and this is communicated to all Approved Suppliers and is continuing to develop to incorporate all suppliers, contractors, and business partners.

#### 4. Risk Assessment and Mitigation

LPG is committed to and takes a proactive approach to eradicating Modern Slavery Risk from our supply chain. LPG's management of Modern Slavery risk, in our operation and supply chain, is guided by our CGPP0002 Ethical Sourcing & Modern Slavery policy as endorsed by the LPG Board.

Our risk-based due diligence process, constructed with reference to our Ethical Sourcing and Modern Slavery Policy, is part of our broader Approved Supplier Program and is designed to identify and assess a range of potential risks in the supply chain, including Modern Slavery.

Steps that we have taken to assess and mitigate risk in our supply chain include:

- working with Suppliers within the Approved Supplier Program to audit their business practices to strengthen their internal policies and procedures; including, but not limited to, workers' labour and payroll conditions;
- the commencement of review and update of Approved Supplier Agreements to include a Modern Slavery Clause, followed by distribution of the revised Approved Supplier Agreements.

As our first period of formal review and reporting, we assessed our top 50 supplier Modern Slavery positions. We examined their statutory reporting obligations concerning the Modern Slavery Act, in compliance with SEDEX auditing and the existence of internal policies relating to Human Rights and Ethical Sourcing. The annual review process with our Tier 1 and 2 (direct and indirect) suppliers now has a requirement to include discussions relating to Modern Slavery, ensuring Modern Slavery Risks are front of mind for LPG and our partners.

#### Policy Framework

LPG's policies, procedures and programs listed below reflect LPG's values, standards, expectations, and commitment to compliance with Modern Slavery from our own team and our suppliers and are based on national and internationally recognised codes of practice, including Ethical Trade Initiative (ETI) Base Code and the Universal Declaration of Human Rights.

- CGPP0003 Anti Bribery & Corruption Policy
- CGPP0005 Ethical Sourcing & Modern Slavery Policy
- CGPP0004 Whistleblower policy
- CGPP0007 LPG Terms of Trade (MERCHANT)
- QTPP0001 Approved Supplier Policy
- HRPP0005 Equal employment, bullying, harassment & discrimination policy
- HRPP0152 Workplace grievance & complaints handling
- HSWPP0001 Health, Safety & Wellbeing
- HRPP0023 Wages Compliance Policy



---

In addition to the company policies, LPG has a range of initiatives that deliver the requirements of the policies and aim to inform, guide, and support the workforce. These include;

#### Third Party Supplier Auditing

All major Australian retailers require all direct and indirect suppliers (Tier 1 and Tier 2) to be ethically responsible by meeting regulatory requirements with regards to employee and labour hire conditions and management. All LPG packing sites and Tier 2 supplier sites must be registered on either of the SEDEX (Supplier Ethical Data Exchange) and Fair Farms ethical databases.

As a Tier 1 supplier, LPG is required to complete frequent SEDEX audits at all packing sites. LPG's Quality and Technical (QT) team provide support to Tier 2 suppliers to register and complete ethical requirements, and regularly report to major customers to ensure that LPG and our suppliers meet all requirements.

#### Employee Assistance Program

LPG's Employee Assistance Program (EAP) provides all employees and eligible immediate family members with a range of services and support. It is a confidential and 24-hour service, with support available for personal and work-related issues including performance, dealing with grief, and stress management.

#### Human Resources Support & Contact Officers

LPG's Business Support Human Resources (HR) team is the first point of contact for all general HR queries and support, [HRsupport@lpggroup.com.au](mailto:HRsupport@lpggroup.com.au). The team regularly support and advise managers on a range of employee development, performance management, employee grievance, employee relations and safety and wellbeing matters. Working with the local Health, Safety & Wellbeing Committees, the HR team appoint and train contact officers, who are positioned to provide impartial, unbiased support to all employees and workers, as an alternative support to the management.

#### Wages and Employee Conditions Hotline

LPG reviews all wages arrangements as part of the annual Wages Compliance Reporting at the end of each financial year, to ensure compliance against minimum wage requirements across the Company's various jurisdictions. These processes are outlined in LPG's Wages Compliance Policy.

All LPG workers have access to a Wages and Employee Conditions Hotline displayed onsite and via the national payroll team. All enquiries are ticketed with documented confirmation that the query is resolved and closed out.

### **5. Managing COVID- 19 Impacts**

Throughout 2020 LPG's Board, Executive and management teams have applied significant focus on the health, safety and wellbeing of its entire workforce and business continuity during the impact period of the COVID-19 pandemic. The implementation of LPG's COVID-19 management plan which includes robust safety and hygiene measures, infection control risk assessments, and increased contact tracing, has been a significant undertaking from the entire business. There has been minimal disruption to LPG's ability to manage modern slavery risk in the period of the COVID-19 pandemic, however, as our operations and the broader community move towards operating in a 'COVID normal' state, LPG is well positioned to expand our review and improvements in managing the risk of Modern Slavery.

---

## 6. Measuring effectiveness

LPG has completed an assessment of Modern Slavery risk as part of LPG's Approved Supplier Program, and we will continue with this approach to expand our level of understanding of the nature of risks pertaining to Modern Slavery within our operations and across our supply chain.

As part of LPG's usual continuous improvement process and for compliance with the Modern Slavery Act 2018 (Aust), the scope of LPG's current internal controls and risk management systems will extend to profile the risk and management of our supply chain partners as it relates to Modern Slavery risk, and to deliver greater oversight of the effectiveness of LPG's risk management systems.

## 7. Consultation

LPG's Board and Audit and Risk Committee retain oversight of LPG's Ethical Sourcing and Modern Slavery Policy and mandate that all stakeholders throughout the Group understand and maintain awareness of the Policy, accessed on LPG's SharePoint shared file storage system, and communicated through the annual training program as implemented by LPG's Human Resources team.

This statement was approved by the board of LaManna Premier Group Pty Ltd on 20<sup>th</sup> May 2021.



Brian Gargiulo  
Chairman  
20<sup>th</sup> May 2021



Anthony Di Pietro  
Group Chief Executive Officer  
20<sup>th</sup> May 2021