



SINCE 1978

Perfection
FRESH®



2024/2025

Modern Slavery
STATEMENT



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INTRODUCTION

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and outlines the steps taken by Perfection Fresh Group (Perfection Fresh) during the period 1 July 2024 to 30 June 2025 (FY24/25) to identify, mitigate, and prevent modern slavery risks across our operations and supply chains.

At Perfection Fresh Group, our commitment to ethical conduct, responsible sourcing, and the protection of human rights is central to how we operate. By closely engaging with our suppliers, retail partners, workers, and the communities we serve, we strive to safeguard human rights and uphold ethical conduct in all that we do.

As we reflect on the past year, we are pleased to see our modern slavery and ethical sourcing programs continue to mature and drive meaningful progress. Throughout FY24/25 we have strengthened our governance frameworks and enhanced our approach to responsible business practices. This includes the review of our responsible sourcing principles, designed to promote greater transparency and resilience across our supply chains. By integrating our updated Supplier Code of Conduct into these principles, we reinforce that protecting workers' rights is a shared responsibility: one we expect all suppliers and business partners to uphold.

"MODERN SLAVERY HAS NO PLACE IN OUR OPERATIONS. WE ARE COMMITTED TO TRANSPARENCY, ACTION AND CONTINUING TO BUILD AN ORGANISATION WHERE EVERY WORKER IS TREATED WITH DIGNITY AND RESPECT."

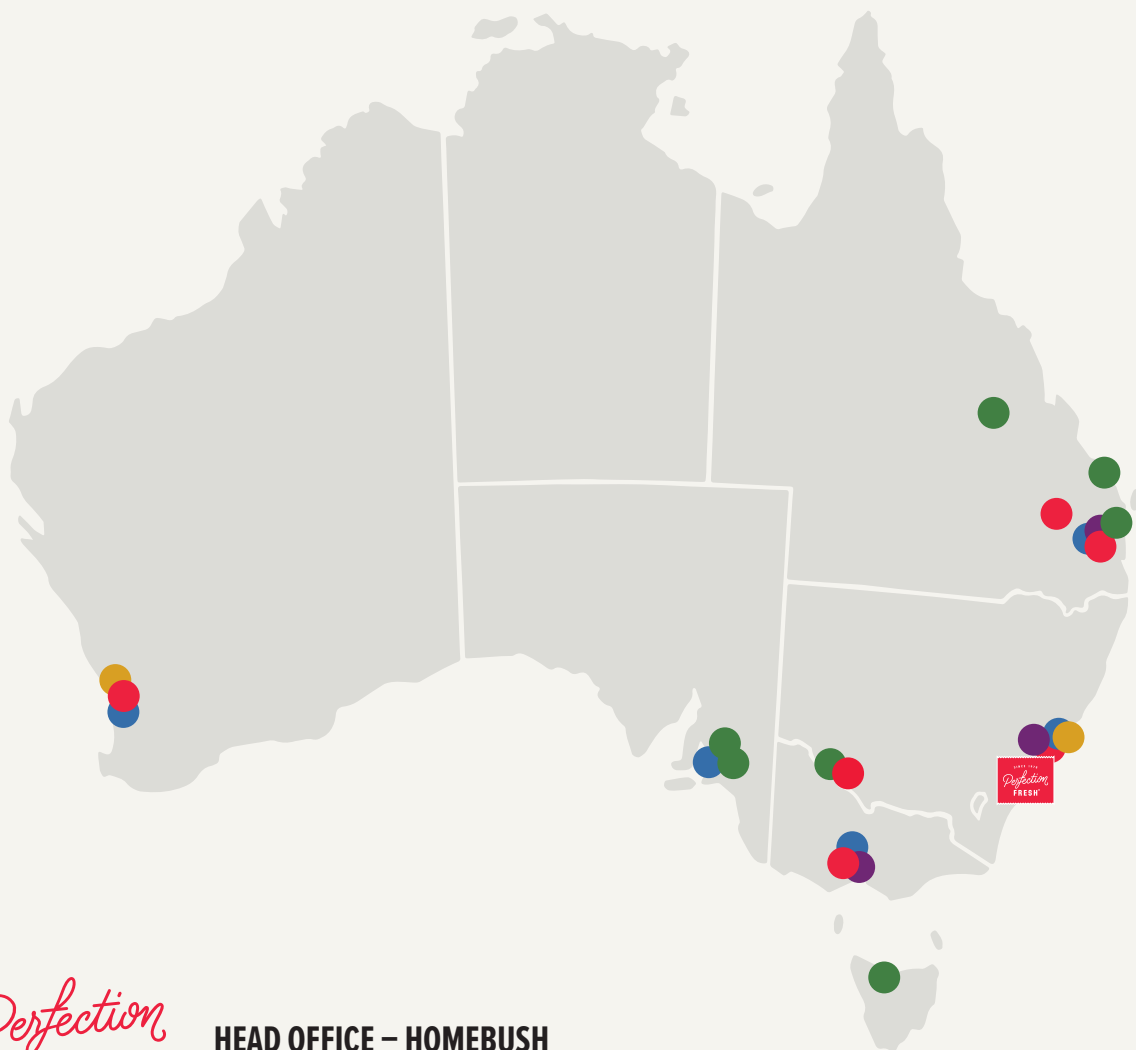
We have also refined our approach to risk management by shifting our focus toward the areas that matter most. Through improved methodologies for identifying priority risk areas and leveraging deeper supply chain insight utilising Sedex analytics, we have strengthened the effectiveness of our due diligence processes. These enhancements have allowed us to act earlier, engage more constructively with high-risk suppliers, and close the loop on remediation and continuous improvement.

Within our own operations, we remain steadfast in fostering a culture that values fairness, respect, safety, and inclusion. These principles are fundamental not only to how we treat our people, but also to the expectations we set across our broader value chain. This year, our cross-functional Sustainability Environmental, Social, and Governance (ESG) Working Group continued to enhance our risk governance framework, including updates to our Ethical Sourcing of Labour Policy and Supplier Code of Conduct to include a remediation section, to ensure strong protections for individuals belonging to vulnerable groups.

While we acknowledge the progress made during this reporting period, including improved supplier engagement, enhanced due diligence capability, strengthened worker voice mechanisms, and increased transparency, we also recognise that modern slavery risks continue to evolve. Our commitment is, therefore, one of continuous improvement. We recognise that this is ongoing work and that further effort is needed, and we remain dedicated to collaborating with stakeholders across the sector to reduce risks, address emerging challenges, and drive positive change.

We thank our workers, suppliers, partners, and customers for their ongoing engagement and support. Together, we will continue striving for a future where all workers across our operations and supply chains are protected, respected, and free from exploitation.





HEAD OFFICE – HOMEBUSH

FARMS

- Perfection Bundaberg
- Perfection Berries Caboolture
- Perfection Two Wells
- Como Wood Supply
- Perfection Berries Riana
- Perfection Grapes Sunraysia
- Perfection Grapes Emerald

TREATMENT FACILITY

- VHT Brisbane
- Ripening Sydney
- Ripening Melbourne

DISTRIBUTION CENTRES/ REGIONAL OFFICES

- Brisbane
- Rocklea
- Sydney
- Melbourne
- Perth
- Gatton
- Werribee
- Robinvale

WHOLESALE MARKET FLOOR

- Brisbane
- Sydney
- Melbourne
- Perth
- Adelaide

VALUE ADD FACILITY

- Sydney
- Perth

OUR STRUCTURE, OPERATIONS, SUPPLY CHAIN

and labour force

PERFECTION FRESH IS A LEADING AUSTRALIAN GROWER, MARKETER, AND DISTRIBUTOR OF FRESH PRODUCE. OUR OPERATIONS EXTEND ACROSS FARMING, GLASSHOUSE PRODUCTION, PACKING, DISTRIBUTION, AND SUPPLY TO MAJOR RETAILERS, FOOD SERVICE PARTNERS, AND EXPORT MARKETS.

STRUCTURE

The ultimate holding company of the Perfection Fresh Group is **Glasshouse Group Holdings ACN 655 131 561**.

There are 28 Australian subsidiary companies within the Perfection Fresh Group, of which **Perfection Fresh Australia Pty Ltd ACN 127 389 682** is the main operating entity for our commercial business.

In addition, we have interests in three joint ventures (within Australia) and operate three companies registered in China, Hong Kong and New Zealand.

OPERATIONS

We operate a diverse network of farms, glasshouses, packing facilities, wholesale market operations, and value-added processing centres across Australia. These sites form the core of our vertically integrated model and support year-round production and supply of fresh produce.

SUPPLY CHAIN

Our supply chain spans our own farming operations and a diverse network of contracted growers, labour hire providers, on-site contractors, and service partners. We engage with more than 300 growers and suppliers across Australia and require all partners to comply with our ethical sourcing standards, including strict expectations regarding labour rights, human rights protections, and modern slavery obligations.

LABOUR FORCE

Our workforce consists of direct employees alongside temporary, migrant, and seasonal workers engaged through labour hire and approved employer programs. Perfection Fresh is committed to ensuring that all workers – regardless of employment type, ethnicity, race, gender or sexuality – are treated fairly, work under safe and lawful conditions, and are protected from any form of exploitation.

We recognise that our success depends on the trust, integrity, and cooperation we foster with our suppliers. Regardless of cultural, social, or economic contexts, we expect all partners to uphold the highest standards of ethical conduct, particularly regarding the fundamental rights of workers. This includes ensuring fair treatment, respect, and the protection of health, safety, and wellbeing in all workplace environments.



MODERN SLAVERY RISKS

in our operations and supply chains

Perfection Fresh recognises that modern slavery risks can emerge at multiple points across our operations and supply chains, particularly where work is low-skilled, seasonal, or dependent on third-party labour arrangements. Our risk analysis for FY24/25 reflects both sustained high-risk areas and newly emerging risk indicators identified through improved data analytics and worker insight mechanisms.

SUSTAINED HIGH-RISK AREAS

Our ongoing assessment confirms that the following areas continue to present the greatest potential for modern slavery exposure:

- **Seasonal and temporary workforce:**
Including labour hire arrangements and PALM scheme workers, where risks may arise in relation to deceptive recruitment, excessive deductions, wage non-compliance, or vulnerability due to visa status.
- **Third-party growers and supply partners:**
Where variable levels of maturity in labour management practices can lead to inconsistency in worker protections and limited visibility of subcontracted labour.
- **Unsafe working conditions in the workplace:**
Managing the risk of harm of unsafe or non-compliant working conditions remains a sustained area of concern, where inadequate safety practices, insufficient training, or poor oversight may expose workers to harm or unfair treatment.

These categories remain areas of focus for enhanced due diligence, supplier engagement, and ongoing monitoring.

EMERGING RISKS AND NEW INSIGHTS

As part of our commitment to continuous improvement, Perfection Fresh has strengthened the way we identify and interpret modern slavery risks using digital supplier mapping tools (Sedex and Fair Farms analytics) and real-time worker feedback mechanisms.

This has allowed us to identify new or emerging risks earlier, including:

- **Indicators revealed through site-level worker voice tools**, such as anonymous surveys and hotline trends that highlight areas where workers feel unsafe, uninformed, or unsupported.
- **Patterns emerging from Sedex risk profiling**, which draw attention to geopolitical or industry-specific pressures that may elevate modern slavery risks in particular sourcing regions or product categories.
- **Early-warning signals** from audit and remediation data, including repeated non-compliances in the same risk domain. These include record-keeping, working hours, or accommodation standards.
- **China business:** Our China operations are relatively small and still developing. We recognise the potential risks related to suppliers and labour practices in the region. In the coming year, we will work with our China office to identify relevant China suppliers; analyse the type of goods/services provided; assess sectors that are considered high risk or have an elevated risk of modern slavery; and obtain information about our suppliers' organisations, reputations and supply chains.

This enhanced capability enables us to engage proactively with suppliers, target interventions where they are most needed, and build a more resilient and transparent supply chain.

Key progress in **FY 2024/2025**

PERFECTION FRESH RECOGNISES THAT EFFECTIVE MODERN SLAVERY RISK MITIGATION REQUIRES ONGOING MONITORING, EVIDENCE-BASED DECISION MAKING, AND CONTINUOUS IMPROVEMENT. IN FY24/25, PERFECTION FRESH CONTINUED TO STRENGTHEN ITS DUE DILIGENCE FRAMEWORK, GRIEVANCE MECHANISMS AND TRANSPARENCY PRACTICES THROUGH INITIATIVES THAT REFLECT EFFECTIVE COMPLIANCE.

Key actions included: enhanced due diligence and risk profiling; independent auditing and remediation; strengthening whistleblower and implementation worker voice mechanisms for all employees and labour hire workers; supplier engagement and training; and data-driven governance training. These initiatives represent our ongoing commitment to transparency and responsible supply chain management.



KEY PROGRESS FOR ACTIONS TAKEN

ENHANCED DUE DILIGENCE AND RISK PROFILING

We refined our due diligence program to ensure our efforts are proportionate to areas of highest risk and informed by real-world data. Key outcomes included:

- **Tiered risk segmentation model:**
We introduced a structured supplier risk segmentation framework that categorises suppliers based on geographic risk, industry exposure, workforce composition, audit history, and Sedex risk indicators. High-risk suppliers were prioritised for annual audits, deeper screening, and targeted capability-building.
- **Data-driven risk analysis:**
Sedex data analytics – including radar scores, self-assessment questionnaires, audit findings, and country benchmarks – were fully integrated into supplier risk profiling. This enabled us to map modern slavery exposure across categories (labour hire, fresh produce suppliers, on-site contractors and logistics) and regions, generating a consistent and defensible risk methodology.
- **Strengthened oversight of labour hire providers:**
100% of labour hire providers engaged by Perfection Fresh remained subject to third-party ethical audits (SMETA and Fair Farms) alongside internal verification checks, including VEO validation, wage reviews, worker interviews, and site observations.

These enhancements increased the accuracy of our risk detection, enabling earlier interventions and reducing repeat non-compliance.

INDEPENDENT AUDITING AND REMEDIATION

We continued to rely on independent social audits as a critical mechanism for verifying working conditions, identifying labour rights concerns, and validating remediation.

- **External audit coverage:**
A total of 217 third-party social audits were completed across our supply chain, including 16 Perfection Fresh sites. These audits, conducted by APSCA certified auditors, assessed working conditions against SMETA 7.0 (ETI Base Code, ILO Conventions and UN Guiding Principles on Business and Human Rights), Fair Farms, and Australian workplace laws.
- **Resolution of non-compliance:**
98% of all audit findings were fully remediated and formally closed within required timeframes. The remaining actions are being monitored through tailored corrective action plans and follow-up reviews.
- **Meaningful remediation:**
Remediation outcomes included back-payment of wages, supervisor training, improvements to record-keeping systems, strengthened onboarding controls, and amendments to policies to prevent recurrence of identified issues.

This audit process reinforces accountability and ensures that identified risks are promptly addressed with lasting outcomes.



Audits undertaken in **FY 2024/2025**

Third-party audits:

217 social audits conducted (SMETA/Fair Farms), including 16 Perfection Fresh sites.

Non-compliance resolution:

98% of findings were remediated and verified closed with the designated program timeframes.

Remediation actions included:

Compensation, training, policy amendments, and improved record-keeping procedures to prevent reoccurrence.



STRENGTHENING WHISTLEBLOWER AND WORKER VOICE MECHANISMS

Empowering workers to speak up safely is one of the strongest indicators of an effective human rights program. In 2024, we strengthened accessibility, visibility, and worker feedback pathways.

- **Independent multilingual whistleblower hotline:**
We continued to promote a 24/7 independently operated hotline available in multiple languages, enabling workers – including indirect and seasonal labour – to raise concerns without fear of retaliation.
- **Multi-language resources:**
Key policies and worker rights information are translated into multiple languages to ensure accessibility for our diverse workforce.
- **Worker Voice Survey initiative:**
We progressed the development of a new online, mobile-friendly Worker Voice Survey to give both direct employees and third-party workers an easy, confidential way to share feedback. This initiative will create a consistent channel for workers across our operations and supply chain to highlight what's working well and raise any issues early, helping us strengthen workplace culture, support recruitment, manage workloads, and maintain safe and fair working environments.
- **Increased feedback volumes:**
Early trials showed stronger worker engagement and more proactive early-stage feedback, helping us address matters quickly and maintain a positive, safe and respectful working environment.

SUPPLIER ENGAGEMENT AND TRAINING

Building capability across our supply chain is essential to reducing/preventing modern slavery risks from emerging or recurring.

- **Mandatory supplier onboarding:**
All new suppliers underwent a comprehensive onboarding program covering the Code of Conduct for Suppliers, Ethical Sourcing of Labour Policy, Approved Supplier Program covering the *Fair Work Act 2009* (Cth), the Ethical Trading Initiative (ETI) Base Code, ILO fundamental conventions, visa rights, grievance mechanisms and remediation pathways.
- **Training delivery across the supply chain:**
More than 600 workers and 120 supplier representatives completed training needs analysis on ethical sourcing, responsible labour practices, and worker rights. Training was delivered through toolbox sessions, assessment questionnaires, posters and on-site induction programs.
- **Quarterly “The Social” newsletter:**
Our dedicated ethical sourcing newsletter continued quarterly distribution, sharing practical guidance on modern slavery risk factors, audit expectations, emerging legislative requirements, and case studies from audits or remediations.
- **Cross-functional collaboration:**
The development of this Statement and our due diligence program involved collaboration across Ethical Sourcing, Human Resources, Sustainability, Category Sales and Supply Teams, and Farm Administrative and Management Teams.

This multi-layered approach ensures suppliers are supported, informed, and held accountable.





REMEDATION FRAMEWORK

Perfection Fresh requires all suppliers to maintain clear, accessible, and effective mechanisms for workers to raise concerns, have grievances investigated impartially, and receive timely, appropriate remedies. These expectations are detailed in our Supplier Code of Conduct and apply across each supplier's operations and wider supply chain.

To reinforce these standards, Perfection Fresh has developed a comprehensive remediation framework that guides suppliers in identifying, addressing, and preventing harm linked to labour non-compliance or potential indicators of modern slavery.

The framework sets out the required steps when issues arise, including immediate actions to protect affected workers, root-cause analysis, development and implementation of corrective action plans, and verification that corrective measures have been effectively closed.

Our approach places worker safety and wellbeing at the centre of all remediation activity and ensures that responses are consistent with our ethical sourcing requirements.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

To evaluate progress, we measure audit completion and remediation closure rates, worker feedback, annual worker surveys (for all workers in our supply chain) and hotline usage, supplier engagement and training participation, and conduct annual internal and third-party reviews of our due diligence system. Regular reviews and board-level oversight ensure continuous improvement and accountability.

Moving forward **ACTION PLAN**

Perfection Fresh will continue advancing our modern slavery response through initiatives such as expanding data integration across all suppliers, delivering capacity-building workshops, launching a multilingual, anonymous whistleblower hotline (through independent service provider Speak Up), and developing e-learning modules on ethical sourcing and modern slavery.

PERFECTION FRESH WILL CONTINUE ADVANCING OUR MODERN SLAVERY RESPONSE THROUGH THE FOLLOWING INITIATIVES:

Focus area	FY2025/2026 targets
Digital due diligence	Expand risk assessment to include worker voice data integration across 100% of Tier 1 suppliers to enhance traceability and reporting accuracy.
Employee wellbeing	Deliver annual independent and anonymous survey on worker experience, culture, ethics, health, safety and human rights.
Worker voice expansion	Implement an independent and anonymous whistleblower service via external service provider Speak Up. The service is a mobile-accessible, multilingual, grievance/whistleblower service across all sites for all workers.
Employee Assistance Program (EAP)	Review of program to enable access for all workers on all sites.
Training and awareness	Develop e-learning module on positive duty, ethical sourcing, forced labour and modern slavery indicators for all team members.
Remediation and support	Strengthen capability tracking and documentation for remediation outcomes, ensuring alignment with legislation and global standards.
Continuous improvement and governance	Modern Slavery Working Group; quarterly progress reviews; annual plan review; targets set to ensure framework remains contemporary and effective.
Supplier engagement	Deliver targeted capacity-building workshops through training and information sessions to high-risk suppliers on forced labour, recruitment, ethics, well-being and modern slavery prevention.



ENGAGEMENT AND CONSULTATION

with stakeholders across the group

Cross-functional teams across ESG, Procurement, and Responsible Sourcing met regularly throughout the year to assess emerging risks and align on appropriate mitigation strategies. Insights from Sedex, Fair Farms, and APSCA accredited auditing bodies developed our risk assessment processes, monitoring activities, and remediation framework.

The development of the FY2024/2025 Modern Slavery Statement was led by our Ethical Sourcing team, with significant contributions from Human Resources, Farm Management, Sustainability, and our Produce Category teams. This collaborative approach ensured a comprehensive and well-supported assessment of modern slavery risks across our operations and supply chain.

We also engage with external stakeholders, including Sedex and Fair Farms certification bodies, to review social compliance expectations and strengthen our approach to social compliance and risk management.



CONCLUSION

Perfection Fresh reaffirms its commitment to embedding human rights due diligence throughout our business. Our FY2025/2026 approach will reflect an evolved understanding of modern slavery risk, one that prioritises transparency, accountability, proactive management and capacity building.

Through effective due diligence, stakeholder collaboration, and continued guidance of NGOs and industry partners, we are taking meaningful steps toward ensuring that all workers within our operations and supply chains are protected, respected, and empowered.

This Statement was approved by the Board of Glasshouse Group Holdings Pty Ltd, the principal governing body of the Perfection Fresh Group, on 7 January 2026.



Dave Chen

CHAIR, PERFECTION FRESH GROUP



Rod Quin

CHIEF EXECUTIVE OFFICER, PERFECTION FRESH GROUP

DISCLAIMER

The purpose of the statement is to provide general information only as required by the *Modern Slavery Act 2018* (Cth) and is correct as of the date of publication.



Appendix A

PERFECTION GROUP COMPANIES

- Agri Administration Services Pty Ltd ACN 601 544 021
- Choice Pack Pty Ltd ACN 127 390 425
- Como Glasshouse Investments Pty Ltd ACN 604 272 951
- Como Glasshouse No 2 Pty Ltd ACN 604 272 942
- Como Wood Supply Pty Ltd ACN 603 344 396
- D'Vineripe Pty Ltd ACN 120 312 049
- Fresh Fruit For You No.2 Pty Ltd ACN 662 850 339
- Fruit Master Australia Pty Ltd ACN 614 029 953
- Fruit Master Farm Operations Pty Ltd ACN 612 363 676
- Fruit Master Holdings Pty Ltd ACN 614 065 655
- Fruit Master Perfection Pty Ltd ACN 614 036 574
- Glasshouse Group Holdings ACN 655 131 561
- Glasshouse Group Pty Ltd ACN 65 131 178
- Growco 3 Pty Ltd ACN 622 822 333
- GrowCo Holdings Pty Ltd ACN 600 368 367
- Organic Foods of Australia Pty Ltd ACN 098 229 095
- Perfection Agri-Fresh Pty Ltd ACN 149 811 156
- Perfection Barwon Pty Ltd ACN 622 822 324
- Perfection Berries Caboolture Pty Ltd ACN 608 700 474
- Perfection Berries Tasmania Pty Ltd ACN 622 822 315
- Perfection Fresh (Hong Kong) Ltd #70489248
- Perfection Fresh Agri-Fresh (Riverina) Pty Ltd ACN 140 000 862
- Perfection Fresh Australia Pty Ltd ACN 127 389 682
- Perfection Fresh Brisbane Pty Ltd ACN 129 766 810
- Perfection Fresh Direct Pty Ltd ACN 128 743 895
- Perfection Fresh Exports Pty Ltd ACN 127 390 210
- Perfection Fresh International Pty Ltd ACN 613 632 901
- Perfection Fresh NZ Pty Ltd Company Number 1974 709
- Perfection Fresh (HANGZHOU) Ltd 91440101MA5CUF1Q0F
- Processing Holdings Pty Ltd ACN 600 368 536



Appendix B

MANDATORY CRITERIA

This Statement was prepared to meet the mandatory reporting criteria set out under the *Modern Slavery Act 2018* (Cth). The points below identify where each criterion of the Act is disclosed within sections of this Statement.

Mandatory criteria	Page number
Identify the reporting entity	4
Describe the reporting entity's structure, operations and supply chains	6
Describe how the reporting entity assesses the effectiveness of these actions	12
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	9
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