



PERFECTION FRESH AUSTRALIA – ETHICAL SOURCING OF LABOUR – POLICY DOCUMENT

Perfection Fresh Australia and its group of companies is committed to upholding human rights, fair working conditions and environmental protection.

In accordance with our customers, the community and the requirements of Federal and State legislation, we endeavour to always operate within the community and we expect the same from our farms, suppliers, and labour hire companies.

We will maintain and enhance our policies to ensure that our employee welfare and protection is a top priority. We will continue to comply with regulations concerning employees' safety and ensure that we pay wages and give benefits that are competitive within the industry and allow, as best we can, workers and their families to have a good standard of living commensurate within the societies they live and work.

We will continue to invest in risk analysis, training and education of our workforce in order to continuously promote safe work habits.

We will not knowingly purchase products from a commercial producer who –

- Violate applicable child labour laws
- Use children in the production or supply of their product
- Practices or condone the use of forced labour.

We are committed to working with our suppliers to help improve their labour and environmental practices.

We expect our suppliers to support the ethical standards as embraced by Perfection Fresh and its group of companies with regard to workplace safety, environment, fair pay and employment conditions. Many of these requirements are drawn from Ethical Trading Initiatives (ETI) and the International Labour Organisation (ILO) Conventions. These represent minimum standards based on the principles of the United Nations Universal Declaration of Human Rights.

To ensure our continued commitment and compliance with these initiatives, we expect our employees and suppliers to comply with all aspects of these initiatives. To ensure compliance we have an extended coverage of international external auditing facilities and annual monitoring processes.





Perfection Fresh Australia is committed to working in partnership with its suppliers to comply with all aspects of this commitment. In the event that any supplier is unwilling or unable to demonstrate continuous improvement towards full compliance with our standards, trading agreement will be terminated.

Audit Process

In order to ensure our businesses and farms operate in alignment with Ethical Standards we embark on a systematic audit process. At the moment, this process includes a quarterly onsite audit for all of our PFA owned farms and facilities. We conduct random audits of our other suppliers, inspecting 10 % of these farms every year.

The audit process is conducted in two parts. The first part is an audit of the documentation of the farm/facility, Supplier or labour hire company, and concerns all aspects of the labour force. The audit form is attached at Annex A. The second part of the audit includes a check of 10% of workers onsite at the time of the audit. The audit form for this process can be found at Annex B.

Audits are conducted in alignment with the audit schedule at Annex C.

In addition, any labour hire company supplying labour to our farms and business is required to provide the following:

- Copies of worker's passports with current visa status
- Provide payslips showing all salary payments, superannuation and leave accruals.
- Bank statement providing evidence of payment to labour hire workers.
- Proof of induction training and copies of relevant tax forms.
- A monthly report showing hours worked per labour hire worker
- Evidence of a comprehensive Workers Compensation policy in respect to and for any and all of the Labour Hire Workers employed.
- A signed contract clearly stating that the labour hire company will comply with all State and Federal Laws in respect to its employees and itself relating to mandatory superannuation contributions and taxation requirements.
- Proof that they are not subcontracting the work to a third party contractor.

Perfection Fresh Australia Pty Ltd
ABN 75 127 389 682
HRM-CP-006_V4.1_ETHICAL LABOUR SOURCING POLICY

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- Proof that they are not renting accommodation to labour hire workers.
- Proof that they are utilising ethical recruitment practices. Practices that require job applicants to pay any fees or charges to gain employment are prohibited in all forms, including if they occur through third party recruitment or other companies or agencies

The onsite audit is conducted by one of our HR Team. This thorough audit process assesses all areas of Ethical Sourcing of labour.

Detailed areas that are checked during the audit include the following:

Labour rights

- Employment is freely chosen
- There is no forced, bonded or involuntary prison labour
- Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

Freedom of Association and the right to collective bargaining are respected

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under Legislation, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Working Conditions

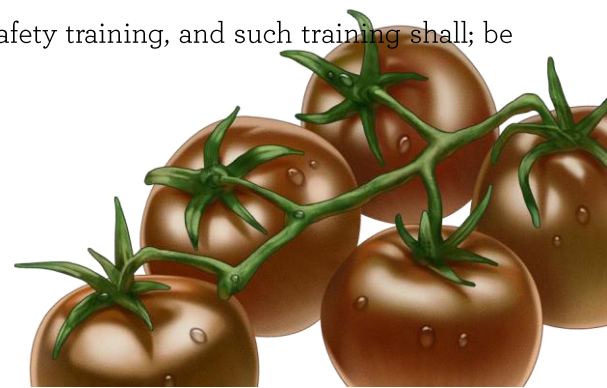
- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health in the working environment.
- Workers shall receive regular and recorded health and safety training, and such training shall; be repeated for new or reassigned workers.

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- Access to clean toilet facilities and clean and drinkable water and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe and meet basic needs of the workers
- Suppliers will ensure that personal protective equipment is available and workers are trained in its use. Safeguards on machinery must meet or exceed local laws.
- Suppliers shall assign responsibility for health and safety to a senior management representative.

Working Hours

- Working hours must comply with Legislation and benchmark industry standards, whichever affords greater protection.
- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average during the peak season. Overtime shall be voluntary, shall not be excessive, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

Living Wages

- Wages and benefits paid for a standard working week at a minimum national legislative standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure or any deductions from wages not provided for by Legislation shall not occur without the expressed written permission of the worker concerned. All disciplinary measures should be recorded.

Regular Employment

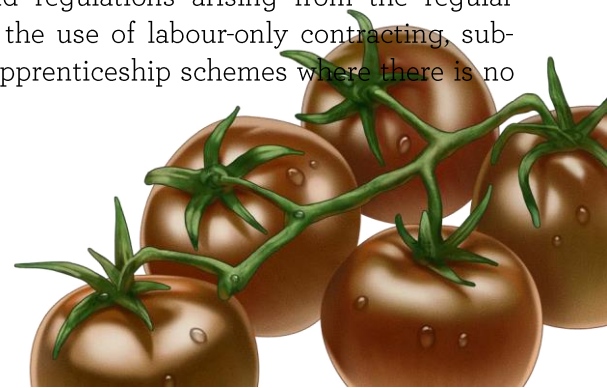
- To every extent possible work performed must be on the basis of recognised employment relationship established through Federal and State legislation and practice.
- Obligations to employees under employment laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangement, or through apprenticeship schemes where there is no

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real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contract of employment.

Discrimination

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Sub-Contracting and Home Working

- There will be no sub-contracting unless previously agreed with Perfection Fresh Australia and its group of companies.

Harsh or Inhumane Treatment

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Entitlement to Work and Immigration

- Only workers with a legal right to work in Australia shall be employed by us
- All workers, including employment agency staff must be validated by PFA for their legal right to work by reviewing original documentation.
- Perfection Fresh shall implement processes to enable adequate control over agencies with regards to the above points and related legislation.

Child Labour

- Perfection Fresh supports ILO Convention 138 with regard to the appropriate age of workers and will not work with suppliers who use child labour. A 'child' is a person who is younger than the local age for completing compulsory education as per the current Education Act. Perfection supports the development of legitimate apprenticeship programs for the education and benefit of young people over the age of 15 years, provided the child is not being exploited or given jobs that is dangerous to their health or safety.

Child labour refers to work that:

- Is mentally, physically or morally harmful to children
- Can negatively affect their mental, physical or social development and
- Interferes with their full time schooling:

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- By depriving them of the opportunity to attend school
- By obliging them to leave school prematurely
- By requiring them to attempt to combine school attendance with excessively long and heavy work
- Reflecting: Child labour is work that deprives children of their childhood, their potential and their dignity and is harmful to their physical and mental development.

Environment Compliance

- PFA facilities shall comply with Federal, State and local environment laws and regulations
- PFA facilities shall dispose of its production waste in accordance with local, Federal and State environment laws and regulations
- PFA facilities will identify and document its key environmental impacts and implement controls to minimise its impact on the environment with respect to solid waste disposal, hazardous chemicals storage and management, air and water emissions.

Compliance with the Policy

- Perfection Fresh Australia and its group of companies expect its Labour Hire Workers, labour hire companies, suppliers and farms to comply with all aspects of this Policy.
- In the event where any Labour Hire Worker, labour hire company, farm or supplier is unwilling or unable to demonstrate full compliance with the above standards, the trading agreement between Perfection Fresh Australia and the supplier will be terminated with immediate effect.

**This document is identified as HRM-CP-006 – Ethical Labour Sourcing Policy.
A new version will be issued by the Chief People Officer whenever significant changes occur.**

Version	Released	Changes	Date
V3.0	Released	Doc coding	20161222
V4.0	Released	Legislative changes	20190411
V4.1	Released	Legislative and due diligence	20200701





Annex A to
Ethical Sourcing of Labour Policy Document

Annex A - Supplier/ Farm/ Facility or Labour Hire Company Audit Sheet – To be checked for all workers.

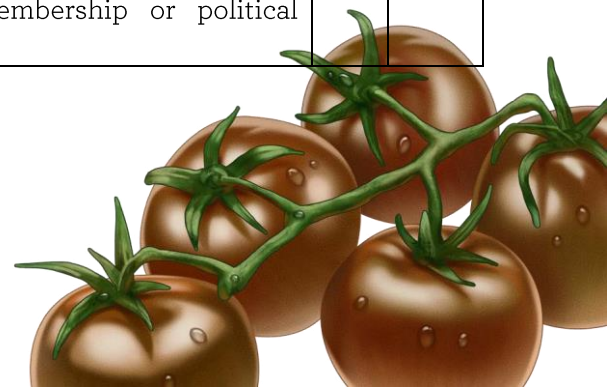
No.	Requirement	Yes	No
1.	Have physically sited all copies of worker's passports with current visa status – check immigration status, and ensure no child labour.		
2.	Have physically sited all payslips showing all salary payments, superannuation and leave accruals and checked that these meet legal minimums.		
3.	View a bank statement providing evidence of payment to labour hire workers.		
4.	Show proof of induction training, copies of relevant tax forms, Fair work Information Statement documents are on file		
5.	Check files for a monthly report showing hours worked per worker, and ensure they meet the legislative requirements (workers are not being over worked).		
6.	Site Workers Compensation policy in respect to and for any and all of the Workers employed.		
7.	Check for a signed contract clearly stating that the Supplier/ Farm/ Facility or Labour Hire Company will comply with all State and Federal Laws in respect to its employees and itself relating to mandatory superannuation contributions and taxation requirements.		
8.	Ensure that they are not renting accommodation to labour hire workers		
9.	Ensure that they are utilising ethical recruitment practices. Practices that require job applicants to pay any fees or charges to gain employment are prohibited in all forms, including if they occur through third party recruitment or other companies or agencies		
10.	For labour hire providers - proof that they are not subcontracting the work to a third party contractor.		
11.	Labour hire providers must provide proof that they possess all licenses, accreditations, permits and registrations that are required under legislation.		
12.	Check that employees are not forced to leave a bond or a key document with their employer (ie Passport)		
13.	Workers are free to join or form trade unions		
14.	A safe and Hygienic working environment is provided		
15.	PPE is provided		
16.	There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation		

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Annex B to Ethical Sourcing of Labour Policy Document

Annex B - Worker Audit Sheet – To be conducted on a random sample of 10% of the labour force

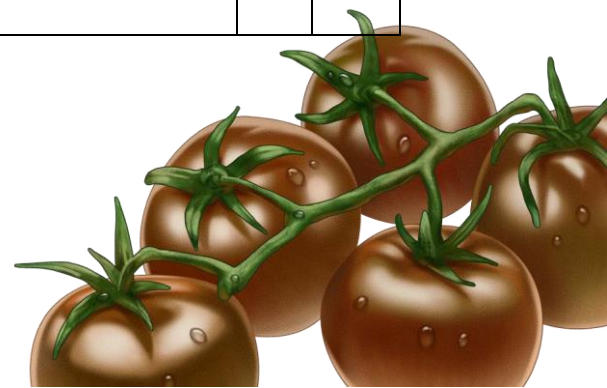
No.	Requirement	Yes	No
1.	Have physically sited the worker's passports with current visa status – checked it meets immigration status and age requirements (ie Child Labour)		
2.	Have physically sited payslip - showing all salary payments, superannuation and leave accruals. Is in alignment with State and Federal Law.		
3.	Ask worker to confirm payments are made on time and in accordance with Payslip.		
4.	Go through all aspects of the payslip, including leave entitlements, and ensure the worker is receiving all of these benefits (ie Annual Leave, Personal Leave, Correct Overtime rates, etc)		
5.	Ask worker about induction training and view copies of relevant training forms		
6.	Check hours worked per week with worker. Ensure they meet state and federal laws.		
7.	Ensure the worker is covered by a comprehensive Workers Compensation policy		
8.	Check for a signed employment contract or letter outlining the employees working conditions		
9.	Ask the worker if they are renting accommodation from their employer, or where they were directed by their employer to reside in that accommodation		
10.	Ask the worker if they are required to leave a monetary bond or key document (such as a passport) with their employer or any other entity.		
11.	Check the workers dress – ensure they are wearing correct PPE, and can get access to it		
12.	Ask the worker about the work environment to ensure it is safe and hygienic		

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Annex C to
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Location	Audit Frequency	Auditor	Type of Audit	Comments
Perfection Fresh Group – Commercial	Annual	Third Party – external provider	SMETA, Workplace Social Accountability	Sedex McDonalds – external
Perfection Fresh – Farms	Annual	Third Party – external provider	SMETA	Sedex
Two Wells	Annual	Third Party – external provider	SMETA, Workplace Social Accountability	Sedex McDonalds – external
All Labour- Hire	Prior to Commencement of provision of services then Quarterly	HR Representative – Commercial & Farms	Internal	StaffSure certification/Labour hire licence, where legislated
Seasonal Workers Program	Prior to Commencement of provision of services then Quarterly	HR Representative – Commercial & Farms	Internal	StaffSure certification/Labour hire licence, where legislated
JV's	Prior to Commencement of trading then Quarterly	HR Representative	Internal	
Independent Farms – Suppliers (produce)	Risk assessment undertaken annually (SAQ)	HR Representative	Internal audit, where appropriate – SMETA/Fair Farms certification	Proprietary Products as a priority
PFA – Brisbane, Melbourne & Perth Markets	Annual	Third Party	Workplace Social Accountability SMETA	McDonalds – external Sedex

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