

SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021

SILVER FERN FARMS LIMITED

Our Commitment:

Silver Fern Farms is committed to enriching people's lives through work and to the fair and humane treatment of people in our employment and across our supply chains. We expect all companies and individuals within our business and supply chain to uphold the highest ethical and legal standards in their workplace practices and policies.

Modern slavery and human trafficking are unethical practices that will not be tolerated. We are vigilant to the threat of modern slavery across our broader business operations, both direct and indirect, and continuously work to improve our approach to identifying and mitigating modern slavery risks.

This is the modern slavery statement for Silver Fern Farms Limited for the financial year ended 31 December 2021. It is made pursuant to section 54(1) of the Modern Slavery Act 2015 (UK).

Our Business:

Silver Fern Farms is a marketer, processor and exporter of premium quality lamb, beef, venison and associated products located in New Zealand. We have 14 processing sites across the country with over 6,000 staff in the peak of the season. We have over 15,000 sheep, beef and deer farmer partners and 2,500 non-farmer procurement partners. We currently operate in over 60 countries and regions around the world and have offices in China, Dubai, USA and the UK. We build long-term partnerships with distributors and customers alike and supply products for retail, e-commerce, foodservice, wholesale, hotels and restaurants, manufacturing customers as well as directly to consumers.

Mitigating Modern Slavery Risks:

Supported by our robust corporate governance and effective risk management practices (aligned to the global risk management standard, ISO 31000:2018), we have embedded a strong ethical culture through our Code of Conduct and related policies and procedures that encompasses doing the right thing, acting with integrity and honesty and accountability for our actions. This culture plays a key role in mitigating the risks of modern slavery.

Our Direct Workforce:

Silver Fern Farms complies with applicable employment legislations and aims to constantly work to build an engaged and collaborative employment culture, reinforced by appropriate training and support. New Zealand has strict employment, immigration and human rights laws that ensures strong independent monitoring and accountability within New Zealand. We have a number of policies and procedures applicable across our global business to promote and embed anti-slavery activity and behaviour. These include, without limitation:

- **Code of Conduct** which describes the company culture at Silver Fern Farms and the expected behaviour of every person working for and with us, regardless of location. In particular, it reinforces the requirements of all employees to take personal responsibility for ensuring they act with integrity and respect, in the best interests of the business and in accordance with the law. The Code of Conduct provides reference information that guides employees when making choices and confirms our commitments to our people, customers, business partners and everyone we interact with in our work.
- **Ethics Policy** which sets out the ethical and behavioural standards expected from our employees in being responsible corporate citizens and expectations of meeting or exceeding all legislative and compliance-based standards such as modern slavery laws.

- **Discrimination, Harassment and Bullying Prevention Policy** which sets out our expectation of how people are treated and how any suspected complaints of discrimination, harassment and/or bullying are dealt with in our business.
- **Procurement and Purchasing Policy** which sets out the expectation that procurement is conducted in an accountable, auditable, honest, fair and transparent manner. Further, we must meet any and all quality compliance and legislative standards, including self-imposed standards that maintain and enhance the health and safety of our people.
- **The Ethical Trading Initiative Base Code (ETI Base Code)** which is founded on the conventions of the International Labour Organisation and is an internationally recognised code of good labour practices outlining labour principles for members to comply with and report on. This code is viewed as a global reference standard and is widely used as a benchmark against which to conduct social audits and develop ethical trade action plans. As a member, Silver Fern Farms report to the ETI annually on our efforts and results we are achieving against the principles of the code.
- **Protection of Whistleblowers Policy** which establishes and monitors a framework where people can raise concerns about any serious wrongdoing or any matter that might negatively impact the reputation of Silver Fern Farms or its people for serious wrongdoing (which encompasses modern slavery). Speaking up is an important safety mechanism for any business and this policy aims to give our people the assurance that they will be protected from punishment or victimisation when they make a disclosure about serious wrongdoing to promote a culture of reporting such behaviour.
- Silver Fern Farms strives for continuous improvement and is in the process of drafting a **Migrant Worker Protection and Support Policy**. This policy outlines Silver Fern Farms expectations on how migrant workers are recruited, engaged and supported during their employment with us – in particular our AIP workers from the Pacific Islands. As it stands, Silver Fern Farms have support in place for our AIP workers including, without limitation:
 - Provision of support in preparation for arrival, on arrival and ongoing while employed;
 - Support for payment of medical and pre-arrival costs; and
 - Support for payment of travel insurance.

Our Supply Chain – Non-Livestock Suppliers:

Silver Fern Farms' anti-modern slavery duty extends to our supply chain. We are working with our vendor base to understand their commitment to anti-slavery practices.. This is done through:

- **Vendor Relationship Management** - with our current vendor base this encompasses monitoring and reviews to ensure our non-livestock vendors meet modern slavery laws. These reviews reinforce our expectations around modern slavery and allows us to audit our non-livestock vendors against these expectations.
- **Due Diligence Enterprise Checklist** - is used by us to evaluate a new potential vendor against our defined requirements necessary to do business with us from the on-set of the vendor relationship. This due diligence checklist has provisions specifically requesting policies and procedures that evidence anti-modern slavery behaviour.

- **Supplier Responsibility Standards** – currently in progress; aim to enhance our relationship with current suppliers and assist us in selecting new suppliers to ensure our supplier base share similar values in the way they do business. Our Supplier Responsibility Standards are in draft stage but are guided by the core principles in the UN Global Compact and the United Nations Universal Declaration of Human Rights. This requires that workers in our supply chain are treated in a manner consistent with the above standards of human rights if they are to start or continue a business relationship with us. These Supplier Responsibility Standards also obligate our vendors to notify us of any potential or actual instances of slavery or human trafficking taking place in their business.
- **SMETA Requirements:** Silver Fern Farms processing plants are subject to SMETA (Sedex Members Ethical Trade Audit). SMETA monitors and reviews our compliance with a variety of internationally recognised standards, including labour and health and safety standards. Further, if we are engaging with stakeholders in our supply chain, we would request SEDEX members to provide their SMETA report or seek appropriate assurances for non-SEDEX members.

Our Supply Chain - Livestock Suppliers:

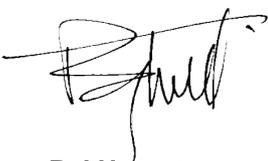
Silver Fern Farms strives to partner with ethical livestock suppliers that are independently accredited to best practice New Zealand farm assurance standards. Such external standards support suppliers to be compliant with ethical business practices such as adherence to employment relations and health and safety legislations, amongst other things. Silver Fern Farms encourage the adoption of best practice standards and actively support suppliers working towards certification.

Review and Approval:

To ensure continuous improvement, Silver Fern Farms reviews our key workforce and supply chain policies, practices and procedures regularly to ensure they remain appropriate and in line with our commitment to the fair and humane treatment of people across our business network.

We monitor the risk of modern slavery and human trafficking within our business and our supply chain and encourage our people to raise any concerns they have so decisive action can be taken. Where particular products, services or geographies present a higher risk, additional assessment and monitoring procedures may be applied.

This Statement was approved by the Board of Silver Fern Farms Limited on 29 July 2022.



**R J Hewett
Co-Chair
Silver Fern Farms Ltd**