



TASSAL GROUP  
*a better tomorrow*

# MODERN SLAVERY ACT STATEMENT

TASSAL GROUP 2021

FARMERS OF THE OCEAN & LAND

21



## TASSAL GROUP

*a better tomorrow*

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### FORWARD LOOKING STATEMENT

This Modern Slavery Statement contains forward looking statements about plans, strategies, and management objectives. No representation, warranty or assurance (express or implied) is given, made or implied by Tassal Group that the forward looking statements contained in this document are accurate, complete, reliable or adequate or that they will be achieved or prove to be correct. Except for any statutory liability which cannot be excluded, Tassal Group and its respective officers, employees and advisers expressly disclaim any responsibility for the accuracy or completeness of the forward looking statements and exclude all liability whatsoever (including negligence) for any direct or indirect loss or damage which may be suffered by any person as a consequence of any information in the forward looking statements or any error or omission from them.

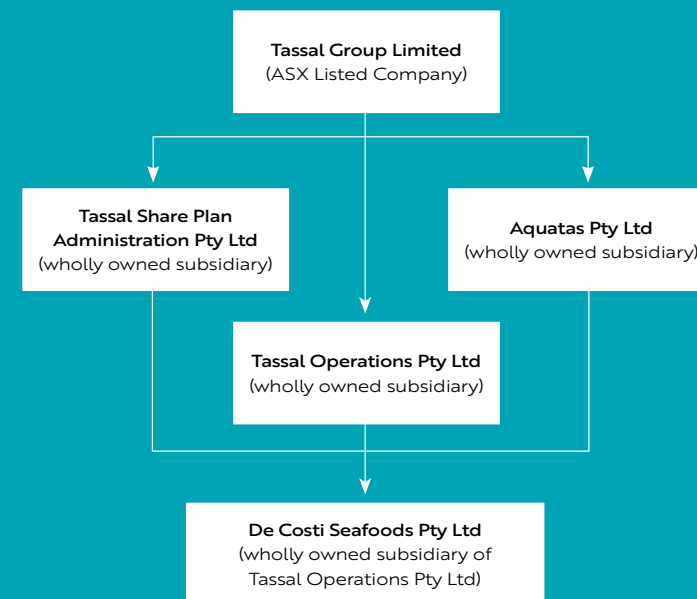
### REPORTING ENTITIES COVERED BY THIS STATEMENT

The ultimate parent entity in the Tassal Group is Tassal Group Limited (ABN 15 106 067 270) which is listed on the Australian Stock Exchange (ASX: TGR). Tassal Operations Pty Ltd (ABN 106 324 127) and De Costi Seafoods Pty Ltd (ABN 606 307 904) are controlled entities and meet the reporting criteria under the Modern Slavery Act (Commonwealth) 2018. This statement is a joint statement covering the Tassal Group and its reporting entities. The Tassal Group of companies share the same policies and procedures although not all the controlled entities have the same set of directors on their respective Boards. In this statement a reference to the Tassal Group includes the controlled entities and includes references to we, us or Tassal.

This statement has been made on behalf of the above entities. It has been reviewed and approved by the Directors of the Tassal Group Board on 30 December 2021.

## Our structure

As at 30 June 2021, the Tassal Group comprised of four controlled entities, being Tassal Operations Pty Ltd, De Costi Seafoods Pty Ltd, Aquatas Pty Ltd and Tassal Share Plan Administration Pty Ltd.



### ACKNOWLEDGMENT OF COUNTRY

We acknowledge the Traditional Custodians of country and their connections to land, sea and community. We pay our respect to their elders past and present and recognise that Australia is home to the oldest cultural tradition in the world.





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## CONTENTS

CEO MESSAGE	04
OUR FOOTPRINT	06
SUPPLY CHAIN	07
RISK OF MODERN SLAVERY	08
ACTIONS TAKEN	09
RESPONSIBLE BUSINESS PLATFORM	11
ASSESSING THE EFFECTIVENESS OF OUR ACTIONS	13
REGULATORY DISCLOSURE MATRIX	14



## CEO message

As farmers of the ocean and land, we believe it is our responsibility to produce healthy and accessible food for the world, build resilient and supported employees and communities, and deliver strong and consistent economic results. We do this while respecting our planet for future generations as we build a better tomorrow.



**MARK RYAN**  
MANAGING DIRECTOR & CEO

**For over 35 years we have built a supply chain that ensures we can deliver seafood of the best quality with the lowest environmental and social impact.**

Our shared values are an essential part of our business and culture – they define us. They underpin and guide our commitment, attitude, how we work and the quality of our products.

We are proud to deliver our second annual Modern Slavery Statement reporting on our ongoing action to understand, identify and address the risk of modern slavery in our operations and supply chain.

We have made good progress, working in partnership with our Category A suppliers to increase transparency and understanding of modern slavery risks across our overall supply chain, and introducing modern slavery awareness training to our leadership team across the business.

In 2021 we joined the **United Nations Global Compact Network Australia** (GCNA) and pledged our commitment to their Ten Principles on human rights, labour, environment and anti-corruption. We look forward to engaging with our global peers on collaborative projects to advance the broader development goals of the United Nations, particularly the **Sustainable Development Goals**.

2021 also saw the launch of our new **Responsible Business Roadmap**, setting out a tailored program of inclusive action across seven areas of accelerated transformation. We have established 25 targets across the seven areas, taking our transparency to the next level, including visual transparency into our operations, farms and supply chain.

Responsible Business is a stronger, more stable, and more enduring ESG and sustainability value proposition to our stakeholders, and we are confident it will not only accelerate our sustainability journey to 2030, but also put us on track to be one of the world's most sustainable protein producers.

**Mark Ryan**  
Managing Director & CEO

**Our shared values are an essential part of our business and culture – they define us.**

**They underpin and guide our commitment, attitude, how we work and the quality of our products.**



### PASSIONATE

We are committed in heart and mind to the work we do, we care and our energy is infectious.



### ACHIEVE TOGETHER

We believe together we can achieve more, we motivate, care for and support each other – to be the best in our field.



### WE OWN IT

We take responsibility for our decisions, performance and safety. We care and never want to let our team down.



### CAN DO - SAFELY

We care and are courageous and loyal in our commitment to achieve.

## Introduction

Respecting human rights is an essential part of being a responsible business and we expect all our suppliers to act with integrity and for their conduct to be aligned with legal, ethical, safe, fair and responsible business practices.

Modern slavery is a violation of human rights and covers incidents of serious exploitation where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Under Australian and international law, it includes offences of trafficking in persons, slavery, servitude, forced marriage, forced labour, deceptive recruiting for labour services and the worst forms of child labour.

We understand our role in addressing global issues and take a zero-tolerance approach to any imposition of, or connection to, modern slavery.

We have embedded modern slavery within our Responsible Business Platform, and rely on the following policies to assist in managing the risks of modern slavery:

- Modern Slavery Policy;
- Supplier Code of Conduct and Ethical Standards (Supplier Guidelines);
- Whistleblower Policy;
- Ethical Behaviour Policy;
- Code of Conduct Policy; and
- Fraud Policy.

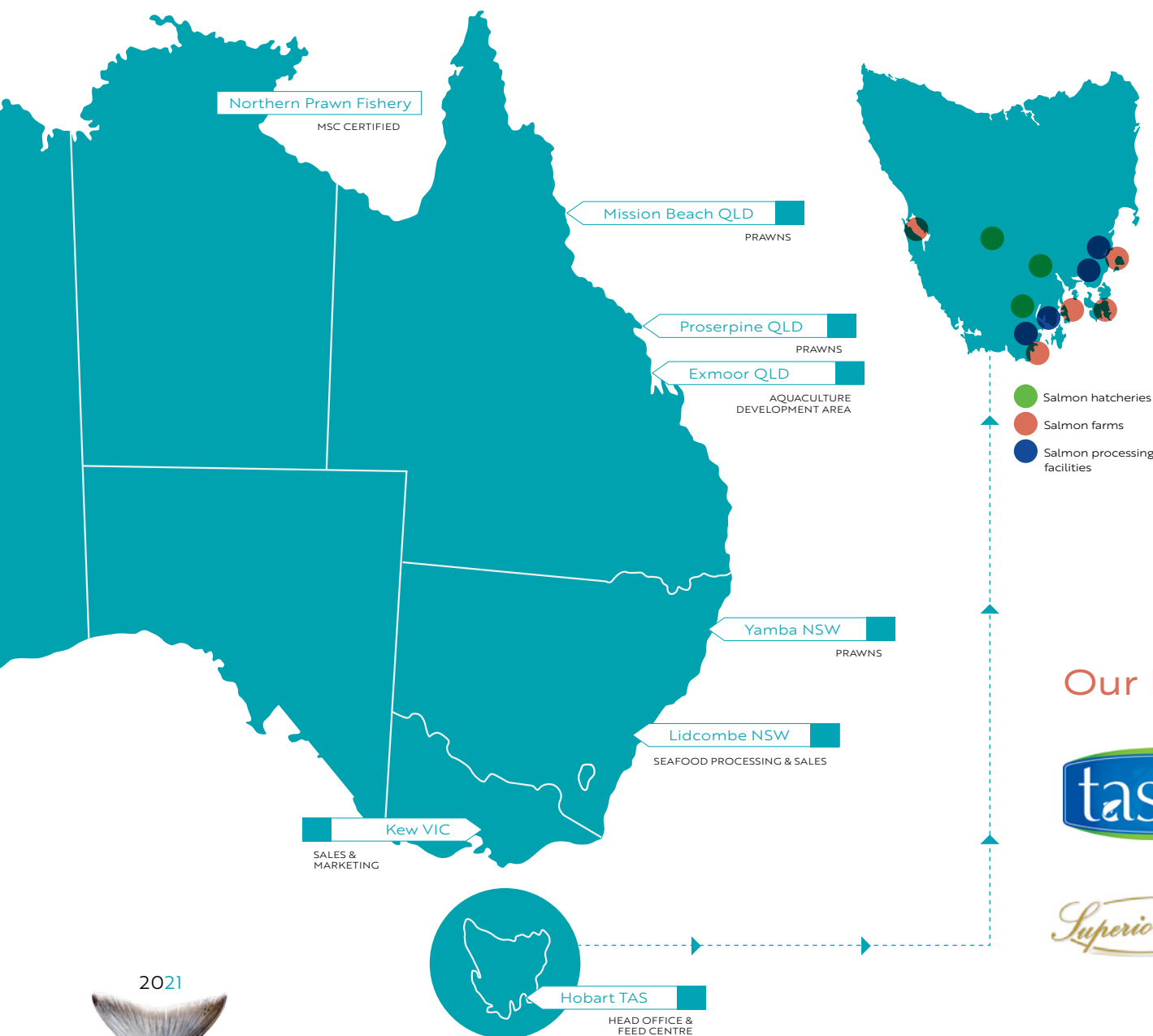
We are committed to maintaining the highest standards of ethics, honesty, openness, and accountability.

## Global standard for human rights

Collectively, our efforts to advance the United Nations Sustainable Development Goals (SDGs) are designed to support a powerful and compelling vision toward blue food production, as a lasting force for good.

Our values and Responsible Business accelerators are aligned with the United Nations Sustainable Development Goals (SDGs). The SDGs, set by the United Nations in 2015, define global sustainable development priorities, seeking to mobilise global efforts around a common set of goals and targets.





## Our footprint

Tassal Group is the largest vertically integrated seafood producer and blue agri-tech business in Australia, employing more than 1700 people across the country. With more than 35 years' experience in responsible aquaculture, our passion drives our commitment to meet the growing market and customer demand for healthy, sustainable and nutritious food.

Our network across Australia includes:

- Two salmon hatcheries
- Majority ownership of Salmon Enterprises of Tasmania Pty Ltd (Saltas), an industry salmon hatchery
- Five diverse salmon marine farming zones
- Four salmon processing facilities
- Two prawn hatcheries
- Three geographically diverse prawn farms
- Three prawn processing facilities
- One seafood processing facility
- One prawn trawler (Northern Prawn Fishery)
- One retail outlet

## Our brands



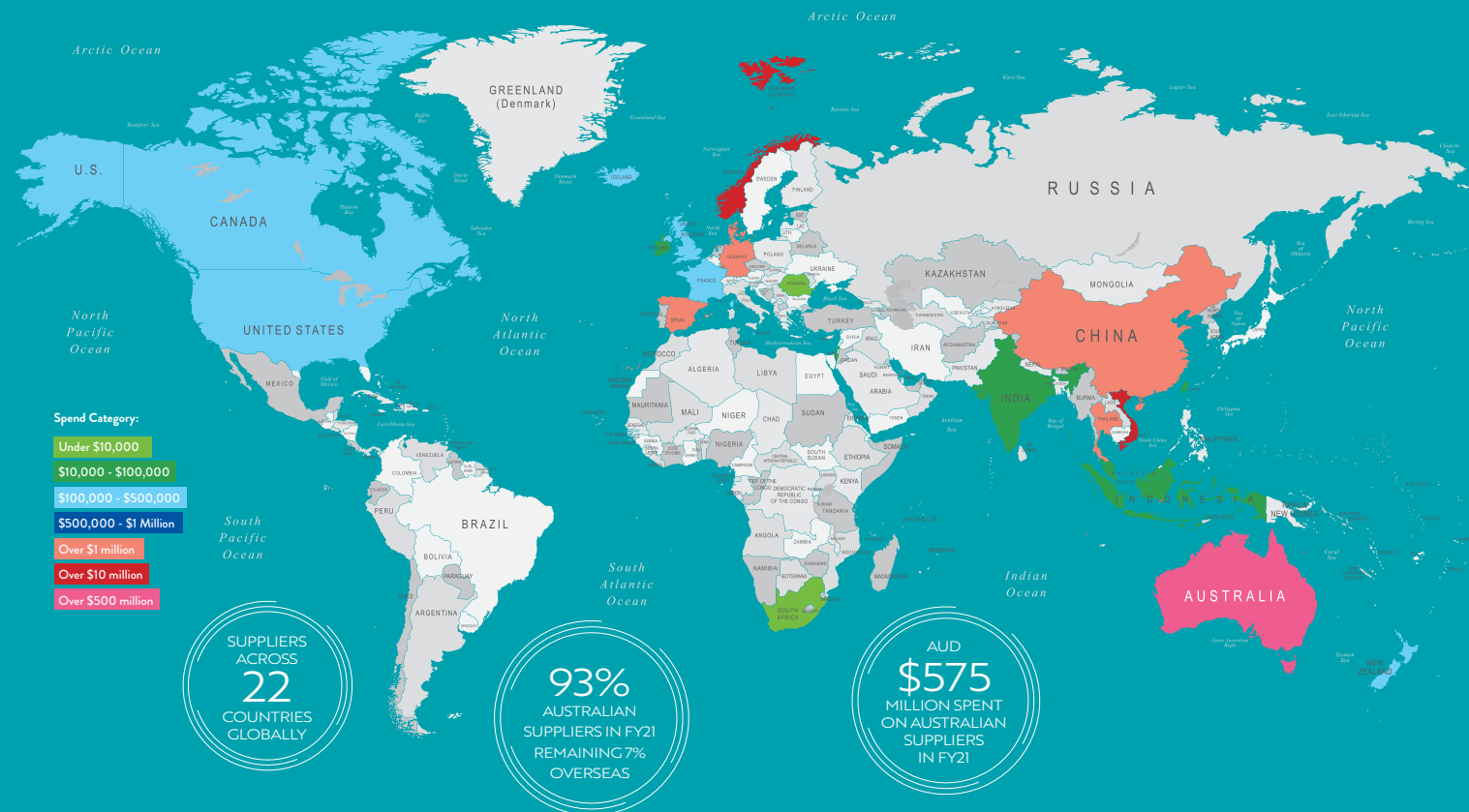
## Supply chain

As an engaged member of the community, our approach to procurement has a strong focus on sourcing goods and services local to where we operate.

Utilising such suppliers and service providers delivers notable benefits, such as cost efficiency, risk mitigation, lower carbon footprint and timely delivery of goods and services.

Strong relationships with our local supplier base creates significant flow on investment and opportunities to the communities surrounding our operations. With our farming and processing sites largely situated in rural and regional locations, these mutually beneficial relationships are integral for us, our suppliers, and the broader community.

We expect all our suppliers to act with integrity and for their conduct to be aligned with legal, ethical, safe, fair and responsible business practices.



### LOCAL SUPPLIER: FRESH FREIGHT

Established in 2003 to provide a real solution for perishable and other food product transport across Bass Strait, Fresh Freight Tasmania operates a comprehensive door-to-door freight forwarding service between Tasmania and mainland Australia, seven days a week service, specialising in the movement of refrigerated and ambient food grade product.

Fresh Freight Tasmania has a diverse customer base, from small to large entities, including primary producers in the horticulture, aquaculture and agriculture industries, value added dairy, meat and aquaculture, and highly processed convenience food supplies.

### LOCAL SUPPLIER: MITCHELL PLASTIC WELDING

Mitchell Plastic Welding Pty Ltd (MPW) is a privately owned and operated business originating in Tasmania's Huon Valley. From the construction of ten, 60m fish pens, delivered by a small team of two people in 1988, they have grown to be a truly customer-focused provider of plastic manufacturing and fabrication expertise. Now employing over 50 full time staff they service a variety of industries within Tasmania, interstate and overseas.

## Risks of modern slavery

We understand that our operations and supply chain have the potential to cause, contribute or be directly linked to adverse modern slavery risks and impacts.

### RISKS IN OUR OPERATIONS

The majority of our employees are directly employed, and the risk of modern slavery is considered low. Employees who are directly employed are typically covered by the terms of collectively negotiated enterprise agreements approved by the Australian Fair Work Commission. These agreements stipulate minimum conditions for wages, hours of work, overtime conditions, additional remuneration, leave entitlements and redundancy benefits. Where the relevant employees are not covered by enterprise agreements, they are typically employed under the terms of modern awards, on above-award wages. For more senior positions, these are commonly engaged under the terms of common law contracts. All Australian employees remain subject to the minimum conditions in the Australian National Employment Standards. Our employment practices are fully compliant with all local laws in Australia.

Our recruitment process has strong governance. Employment decisions are based on the principle of merit, with no instances of forced labour. All employees must demonstrate their legal right to work in Australia. All labour hire workers are provided through appropriately licensed agencies.

### RISKS IN OUR SUPPLY CHAIN

We take a risk based approach to supplier management, considering factors such as spend, volume of supply, geographic origin and inherent risk of the product being supplied. We are increasing our risk knowledge and awareness through engagement with industry experts, attending webinars and reviewing reports on risks associated within the food manufacturing industry as well as products and services within our supply chain.

#### SUPPLIER CATEGORY

Category A	Over \$10 million
Category B	\$2.5 - \$10 million
Category C	\$1 - \$2.5 million

RISK FACTOR	ACTION
<b>Spend</b>	<ul style="list-style-type: none"> <li>• Supplier assessment and approval required. All Category A supplier assessed in FY21, Category B &amp; C suppliers to be assessed in FY22.</li> <li>• Modern slavery clauses included in contracts for new suppliers to the business.</li> </ul>
<b>Volume of supply</b>	<ul style="list-style-type: none"> <li>• Modern slavery clauses included in contracts for new suppliers to the business.</li> <li>• Compliance with Supplier Code of Conduct and Ethical Standards.</li> <li>• Based on outcome of risk assessment suppliers may be required to provide evidence of a recent third party ethical audit.</li> </ul>
<b>Geographic origin</b>	<ul style="list-style-type: none"> <li>• Modern slavery clauses included in contracts for new suppliers to the business.</li> <li>• Compliance with Supplier Code of Conduct and Ethical Standards.</li> <li>• Based on outcome of risk assessment suppliers may be required to provide evidence of a recent third party ethical audit.</li> </ul>
<b>Inherent risk of product</b>	<ul style="list-style-type: none"> <li>• Modern slavery clauses included in contracts for new suppliers to the business.</li> <li>• Compliance with Supplier Code of Conduct and Ethical Standards.</li> <li>• Based on outcome of risk assessment suppliers may be required to provide evidence of a recent third party ethical audit.</li> <li>• Third-party certifications required where applicable (e.g., seafood supply, fish feed).</li> </ul>



## Actions taken

Our progress against our commitments in FY21.

OUR ACTION	PROGRESS
Due diligence – 100% of category A* suppliers assessed.	Completed
Join UN Global Compact Network Australia (GCNA).	Completed
Maintain third-party certifications across operations.	Completed
Develop Modern Slavery Policy and Procedure including action plan to assess and manage identified risks.	Commenced
Implement modern slavery performance scorecard to measure, track and evaluate the effectiveness of our actions.	Completed
Company-wide engagement through Modern Slavery Working Group.	Commenced
Modern slavery training conducted for key internal stakeholders including leadership team.	Commenced
Modern slavery clauses included in all major contract agreements.	Completed
Responsible Business Roadmap launched including modern slavery and responsible sourcing targets.	Completed
Risk and Responsible Business Committee of the Board established.	Completed

\*suppliers with a spend over AU\$10 million

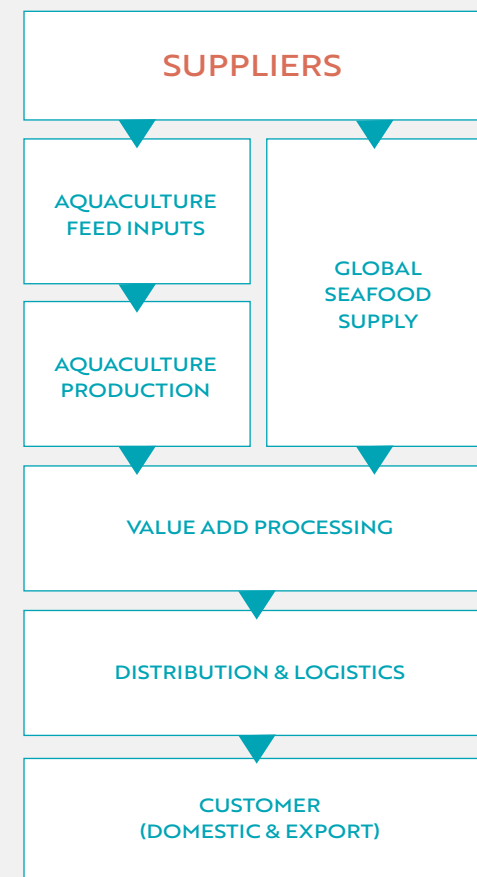
## Supplier assessment

The supply chains associated with our products are diverse and extend through various geographic locations. Our key supplier groups cover seafood, aquaculture feed, CAPEX equipment, ingredients, packaging, logistics, warehousing and third-party processing.

Our cross-departmental Modern Slavery Working Group continued the assessment of modern slavery risks in our overall supply chain. In 2021, we completed the assessment of all of our Category A suppliers. These suppliers demonstrated an understanding and awareness of modern slavery and the requirements set out in our Supplier Code of Conduct and Ethical Standards (Supplier Guidelines).

The assessment was conducted against the supplier's responses to our approved supplier questionnaire and the provision of supporting documentation such as Modern Slavery Statements, policies and evidence of relevant ethical and sustainability certifications.

Ongoing approved supplier status is based on supplier performance and maintenance of all relevant licencing and certifications, as well as a re-submission of the approved supplier questionnaire on a three-yearly basis.



## Modern Slavery Policy

Our policies align with the ASX Corporate Governance Principles, are accessible to every employee and form part of our induction process. Developed in consultation with our Modern Slavery Working Group, our Modern Slavery Policy outlines our commitment to:

- Not knowingly use or contribute to modern slavery practices in any form;
- Actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chain;
- Comply with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association; and
- Continue to support suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our supply chain.

Read our Modern Slavery Policy [here](#).

## Responsible Business Roadmap

Our Responsible Business Roadmap represents our commitment to being a responsible global citizen and creating a pathway toward zero tolerance to any form of modern slavery. Our aim is to reduce exposure to modern slavery risks, and work with suppliers and contractors to provide appropriate remediation of modern slavery risks in our supply chain.

The Roadmap also introduces our responsible sourcing strategy, with a focus on driving sustainability through traceability, security and responsibility. Under this framework we have established a target for 100% of our category A, B and C suppliers to be approved under our Approved Supplier Program in 2022. Further, we continue to pursue a target of 100% of purchased seafood certified to a third-party sustainability standard or subject to a formal State or Commonwealth fisheries management plan.

Read our Responsible Business Roadmap [here](#).

## Governance

Our corporate governance framework has a focus on transparency, accountability, stewardship and integrity. We have established a Risk and Responsible Business Committee of the Board who have oversight and ultimate responsibility of our Responsible Business Roadmap, Modern Slavery Policy and activities.

## Inclusion and diversity

We believe that a culture of inclusion leads to diversity of experience, perspective and thinking, creating an amazing place to work with better outcomes for our people and our customers.

We are committed to an inclusive workplace that embraces and promotes diversity. We value, respect, and support the unique contributions our people make to delivering exceptional outcomes across our business.

We acknowledge that to be truly successful, we must reflect the diversity of our consumers and the communities we operate within. That's why we foster a culture that ensures our people are genuinely included, are given equal opportunities, and encouraged to bring their whole self to work.

To us, inclusion is more than just gender, and our commitment spans across work style, parental status, sexual orientation, race, ethnicity, language, age, mental and physical abilities, religion, education, personality, skills, experience, knowledge, and gender identity. An inclusive culture enables our definition of diversity to expand and mirror societal standards.

See our Inclusion and Diversity Policy [here](#).





## Responsible Business Platform

### OUR VISION

A better tomorrow

### OUR VALUES

Our values define our business and culture, and underpin our commitment, attitude, how we work and the quality of our products



#### Passionate

We are committed in heart and mind to the work we do, we care and our energy is infectious



#### Achieve Together

We believe together we can achieve more, we motivate, care for and support each other – to be the best in our field



#### We Own It

We take responsibility for our decisions, performance and safety. We care and never want to let our team down



#### Can Do - Safely

We care and are courageous and loyal in our commitment to achieve

### OUR MISSION

As farmers of the ocean and land, it is our responsibility to:

- Produce healthy and accessible food for the world;
- Build resilient and supported employees and communities; and
- Deliver strong and consistent economic results.

While respecting our planet for future generations as we build a better tomorrow

### OUR GUIDING PRINCIPLES



People



Planet



Product



Prosperity



Principles of Governance

### CODE OF CONDUCT

### OUR RESPONSIBLE BUSINESS ACCELERATORS

#### Waste

Playing our part for waste free oceans, coasts and households

#### People and Communities

Being a responsible global citizen and unlocking our people potential while embracing our ZerobyChoice safety culture

#### Climate and Circularity

Towards climate and carbon neutral

#### Freshwater

Every drop counts

#### Responsible Sourcing

Driving sustainability through traceability, security and responsibility

#### Governance

A pathway for ongoing value creation + confidence through transparency, strategy and leadership to put us on track to be one of the world's most sustainable protein producers

#### Animal Welfare

We care about the wildlife in the environment and our stock is thriving and healthy

### STAKEHOLDER ENGAGEMENT AND GOVERNANCE

#### What Matters

In prioritising the issues of most importance to Tassal, we look at our own business goals, activities, and impacts, monitor emerging issues and we seek the views of our stakeholders

COMMUNITY OUR PEOPLE INVESTORS CUSTOMERS CONSUMERS SENTIMENT RESEARCH

Company ESG Policies  
Operational Policies  
Management, data reporting, risk management and assurance  
Responsible Business architecture

#### Tassal Group Board

The Board has oversight and ultimate responsibility of our Responsible Business Roadmap

The Board receive regular updates and has oversight of how our business is performing across all our internally defined, sustainability related material risk areas

#### Risk and Responsible Business Committee of the Board

#### Responsible Business Executive Sponsors

#### Responsible Business Steering Committee

Responsible Business, sustainability and ESG principles, guidance and policies are integrated throughout the business and give guidance on the standards we expect

### TRANSPARENCY AND ROUTINE DISCLOSURE

We do what we say, and we show you

### KEY PARTNERSHIPS



### INNOVATION

## Case studies

### CASE STUDY: UNITED NATIONS GLOBAL COMPACT NETWORK AUSTRALIA

The **United Nations Global Compact Network Australia (GCNA)** is committed to multi-stakeholder engagement and recognises the importance of continuing meaningful consultation with all stakeholder groups around preventing and addressing business involvement in modern slavery, including ensuring the voices of workers and survivors are heard.

The GCNA has a long-standing commitment and strong approach to raising awareness of international business and human rights standards and facilitating multi-stakeholder discussion around their implementation including through their Modern Slavery Community of Practice and Australian Dialogue on Business and Human Rights.

The Ten Principles of the United Nations Global Compact are derived from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.



#### HUMAN RIGHTS

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses.

#### LABOUR

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** the elimination of all forms of forced and compulsory labour;

**Principle 5:** the effective abolition of child labour; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation.

#### ENVIRONMENT

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

#### ANTI-CORRUPTION

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

### CASE STUDY: GLOBAL SALMON INITIATIVE (GSI)



We are a member of the **Global Salmon Initiative (GSI)**, a collective of companies from the global farmed salmon industry that are united by the mission to drive improvements in environmental and social performance of the industry and improve consumer access to responsibly farmed salmon. For the GSI, social responsibility means businesses proactively managing the impacts of their operations and supporting employees, customers, local communities, and individuals within their value and supply chains to ensure we are having a positive contribution to the places where we operate.

#### High Impact

AMBITION	POWER	CAPACITY	COMMUNITY	TRANSPARENCY
Motivation to go further than you could as individual companies	The technical know-how and CEO engagement to make change happen	Sharing of resources to find solutions faster, and implement them at speed and scale	Bringing together the wider aquaculture industry and whole value chain to identify solutions and apply them at a larger scale	A focus on improved transparency and accountability to stakeholders and each other





## Assessing the effectiveness of our actions

We are committed to ensuring that changes and actions taken to identify, assess and address risks of modern slavery are effective.

We have implemented a modern slavery performance scorecard reported quarterly to allow us to measure, track and evaluate the effectiveness of our actions.

While we develop the foundational architecture and establish systems that will underpin the delivery of our Responsible Business targets we will continue to collect data on our suppliers and track the implementation of our Modern Slavery Policy and Procedure.

### Modern Slavery Scorecard



GOVERNANCE



DUE DILIGENCE


ACTION &  
REMEDiation

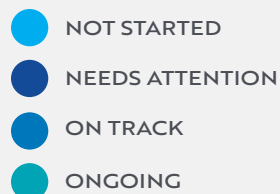

EFFECTIVENESS



ASSURANCE



DISCLOSURE



## Future priorities

As we look ahead, we will continue to develop actions and strengthen and refine our reporting practices with a focus on further developing and enhancing our ethical sourcing practices to reduce exposure to modern slavery risks, as well working with suppliers and contractors to provide appropriate remediation of modern slavery risks in our supply chain.

- Conduct an assessment of our contractual controls and work to ensure all suppliers formally acknowledge our Modern Slavery Policy and our Supplier Code of Conduct and Ethical Standards (Supplier Guidelines).
- Extend supplier assessment to Category B and C suppliers.
- Strengthen and implement Modern Slavery Procedures with a focus on systems for investigation and remediation.
- Extend training program to 100% of employees.
- Upgrade our Sedex membership to allow risk assessment of our own suppliers. Sedex is one of the world's leading ethical trade service providers, working to improve working conditions in global supply chains.
- Major tenders to include weighted assessment criteria for sustainability factors.



## Regulatory Disclosure Matrix

### REGULATORY DISCLOSURE MATRIX

The table below references where mandatory criteria are disclosed for the *Australian Modern Slavery Act 2018 (Cth)*.

CRITERION	MANDATORY CRITERIA	DISCLOSURE REFERENCE
1	Identify the reporting entity	Page 2
2	Describe the reporting entity's structure, operations and supply chains	Page 6-7 2021 Sustainability Report page 5, 17-23, 50-53
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 8
4	Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation process	Page 9-12
5	Describe how the reporting entity assesses the effectiveness of these actions	Page 13
6	Describe the process of consultation with any entities that the reporting entity owns or controls	Page 2







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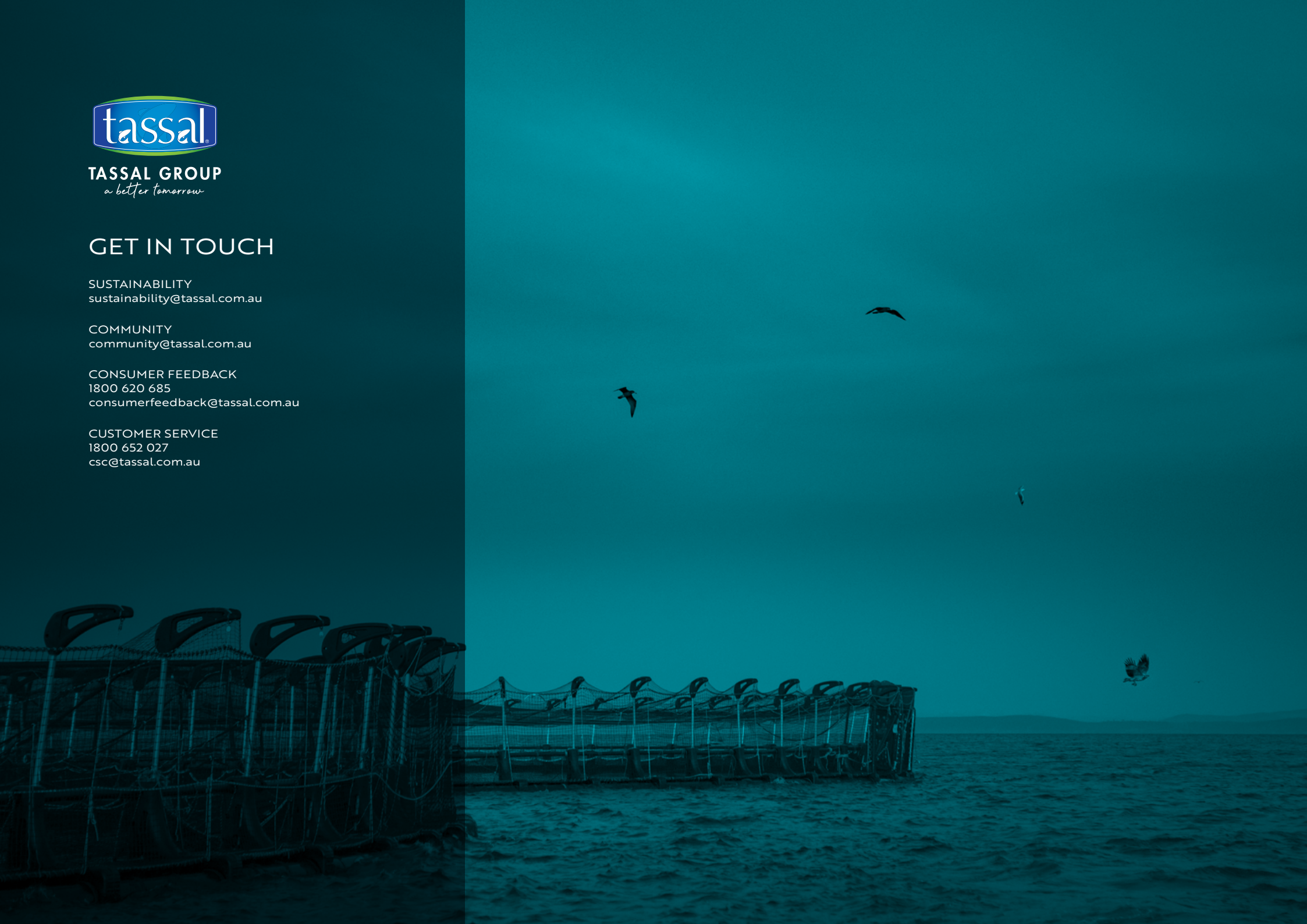
## GET IN TOUCH

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