

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Modern slavery, in particular human trafficking, is an international problem and takes a number of forms, including exploitation, forced labor and domestic servitude.

At Peerless we acknowledge we have a responsibility in playing a role in eradicating modern slavery.

Peerless has in place a number of policies aimed at helping to identify and mitigate the risk of modern slavery in our business and supply chains.

Our Code of Conduct, Code of Ethics, and Ethical Sourcing Policy define the standards of behaviour expected of all associated with Peerless.

These policies set out Peerless’ expectations of how representatives should relate to one another including how we employ people and abide by current employment laws, and also our expectations of suppliers.

Relationship with Suppliers

Peerless has a Supplier Chain Assurance Program that is used to ‘onboard’ new suppliers. This program includes questions that focus on the suppliers’ modern slavery policies and practices.

Peerless has a zero tolerance approach to slavery and human trafficking and we make clear our expectations of suppliers, including adherence to the Group’s policies outlined above irrespective of whether it is an explicit contractual term.

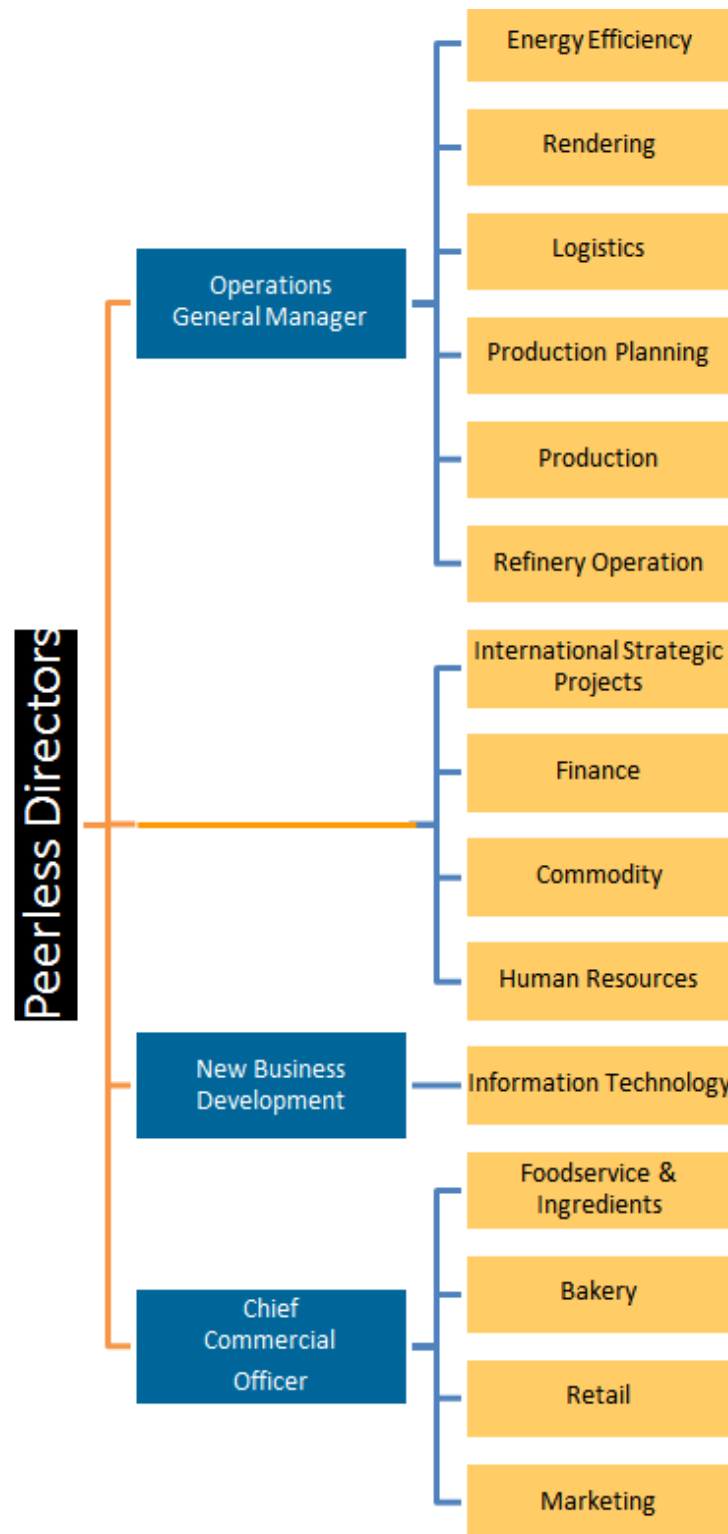
When ‘on-boarding’ new suppliers Peerless will endeavor to obtain copies of the supplier policies on employee and supplier conduct. Among other things, this Program includes a questionnaire that focus’ on the suppliers’ modern slavery policies and practices, but also requires suppliers to provide information on employment conditions including hours of work, salary information, safety and training. This way, Peerless can ascertain what actions suppliers take to ensure that slavery and human trafficking do not occur in our businesses or supply chain.

Where suppliers are not able to satisfy us as to their compliance with our policies on modern slavery Peerless will endeavor to work with the supplier to help them improve their practices. If there is unwillingness from the supplier to engage with Peerless on this issue in good faith or there is a lack of objective steps taken towards compliance, Peerless may seek to sever ties with that particular supplier.

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Company Structure



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Supply Chain and Risks:

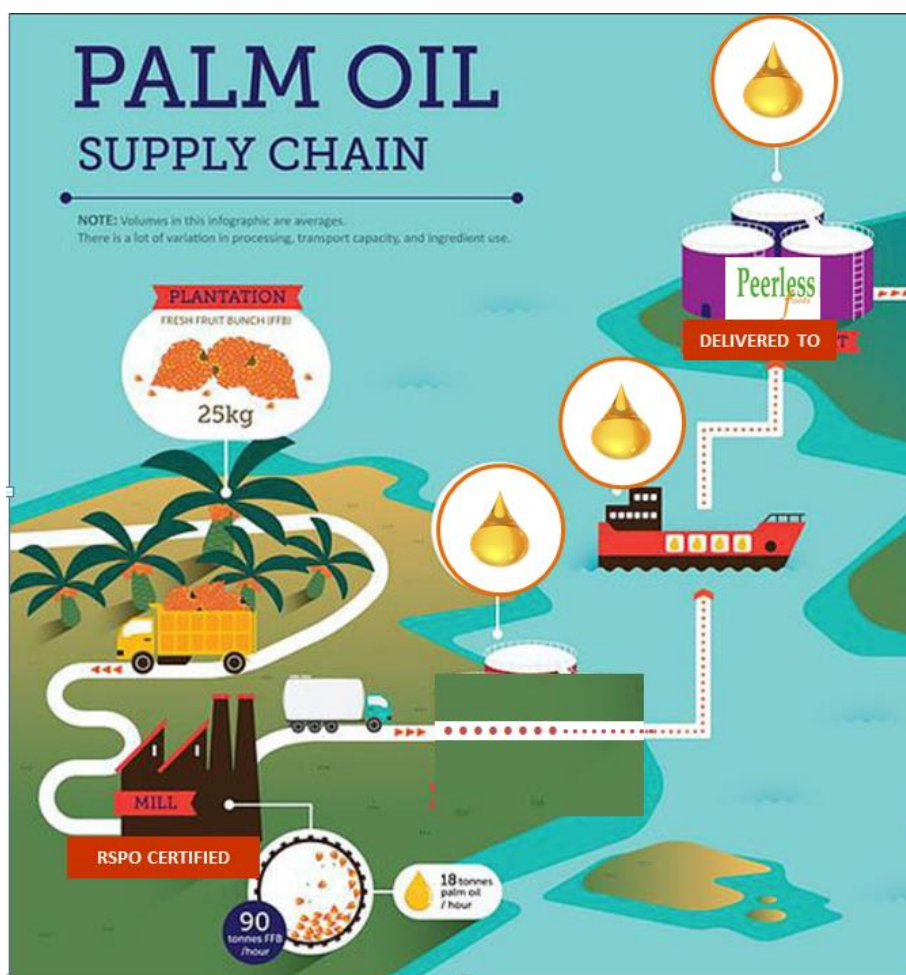
Our oil is supplied from various International and Australian companies which procure oilseeds and other crops and process the oilseeds into vegetable oils. The companies are subject to external International assessment standards including HACCP, RSPO, SEDEX and SQF.

These suppliers must also comply with Australian State and Federal Employment laws.

With the level of monitoring of suppliers by State and Federal Australian departments, and the information obtained by the Ethical Sourcing Questionnaire Peerless has in place policies and procedures to ensure suppliers are complying with their obligations.

Peerless will however monitor our suppliers by requiring them to complete the supplier questionnaire every two years and provide audit reports from quality assurance audits conducted on their sites, for example RSPO Standard, SQF, Sedex.

Supply Chain



Our ‘Modern Slavery and Human Trafficking’ statement relates to the responsibilities of Peerless and all State and National Offices ensuring that the company follows the same policies and procedures to undertake effective steps to identify and root out contemporary slavery.

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Related Policies include:

- Peerless Code of Conduct
- Peerless Code of Ethics
- Peerless Ethical Sourcing Policy

Peerless Ethical Sourcing self-assessment Form

Document No.	Document Name	Issue Date:
	ETHICAL SOURCING SELF ASSESSMENT FORM	
Version No.		
1.0		

Business name:

Regulatory compliance		Yes/No	Details & Supporting Comments
1	Do you have a copy of the Peerless Ethical Sourcing Policy?		
2	Do you have a copy of the Peerless Modern Slavery Statement?		
3	Is your company committed to complying with the Peerless Ethical Sourcing Policy?		If no, please explain...
4	Has your company completed a social/ethical audit by a third party auditing body?		If Yes, Please attach copy of audit report with this completed Form
5	What other international certification bodies are you associated with?		
Employment		Yes/No	Details & Supporting Comments
6	Can you confirm that all Labour used is legally employed.		If Yes, please explain...
7	Are you able to verify the right of all your employees' legal eligibility and entitlement to work in the country/ region of employment?		If no, please explain...
8	Do you acknowledge that workers have a right to develop or join unions or bargain collectively?		
Elimination of child labour and Modern Slavery		Yes/No	Details & Supporting Comments
9	Do you hold evidence of the date of birth of all employees?		If no, please explain...
10	Do you comply, at all times, with the legal requirements of State laws when employing young people?		If no, please explain...
Right to a living wage		Yes/No	Details & Supporting Comments
11	Do all workers have a written contract covering conditions of employment which is in a language understood by the employees?		Provide example if yes
12	Do the wages and benefits paid to all employees comply with the State or Federal law?		If no, please explain...
13	Do you provide all workers with information about their wages each time they are paid?		If no, please explain... If yes provide example:

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Avoidance of excessive working hours		Yes/No	Details & Supporting Comments
14	Do the hours worked by all employees comply with State/Federal laws		If no, please explain...
15	Are the hours worked by all employees recorded and documented as legally required?		If no, please explain...
16	Is overtime voluntary and what is the maximum amount of overtime hours worked each week?		If no, please explain...
No discrimination		Yes/No	Details & Supporting Comments
17	Do you have a policy/ procedures to prevent discrimination in the workplace? Discrimination may be based on gender, ethnic origin, religion, personal beliefs etc.		If no, please explain... If yes provide example:
Discipline		Yes/No	Details & Supporting Comments
18	Do you have appropriate policies, and procedures in place to prevent workers from being threatened with, or subjected to physical, verbal or sexual abuse / harassment?		If yes provide example.
Health and Safety		Yes/No	Details & Supporting Comments
19	Do you have a written policy/ procedures that reflect State/Federal laws regarding health, safety and working conditions?		If no, please explain.. If yes provide example:
20	Are workers provided with and trained to perform their job safely and trained in the use of personal protective safety equipment where required?		If no, please explain...
21	Does all machinery have safeguards that meet local laws?		If no, please explain... If yes, please verify
22	Are there properly maintained fire-fighting equipment?		If no, please explain... If yes, please verify
23	Are workers provided with clean toilet facilities, clean & drinkable water, suitable food preparation and storage areas?		If no, please explain... If yes, please verify
Environment		Yes/No	Details & Supporting Comments
24	Does your facility have an environmental policy?		Provide example
25	Does your facility comply with the local environmental agency policies and requirements?		If no, please explain... If yes, please verify

Declaration: I, as an authorised representative of supplier declare for and on behalf of the Supplier that to best of my knowledge, information provided in this document is true and accurate.

Company:

Name of the Person (who made this declaration):

Position:

Date:

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