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# Slavery and Human Trafficking Policy

Valid Until – 16 March 2019

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Quarter One 2018	Document Name: Slavery and Human Trafficking Policy	Policy Owner: Justin Courtney – Head of Communications and Sustainability	Approved By: Simon Limmer Chief Executive	Review Date: 16 March 2019
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## Policy Statement: Slavery and human trafficking

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (UK) and constitutes the Silver Fern Farms Limited slavery and human trafficking policy for the year ending 16 March 2019.

- Silver Fern Farms is committed to social and environmental responsibility and to the fair and humane treatment of people in its employment and in its supply chains.
- Silver Fern Farms insists that all companies and individuals within our supply chain uphold the highest ethical standards in their workplace practices and policies.

## Scope of Policy

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This policy applies to any Slavery and human trafficking (suspected or actual) within Silver Fern Farms Operations or Supply Chain, defined as management, employees, consultants, vendors, vendor suppliers, contractors, outside agencies doing business with Silver Fern Farms, personnel of such agencies and/or any other parties with a business relationship with Silver Fern Farms.

## Policies

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It is our belief that modern slavery and human trafficking are abhorrent practices that will not be tolerated in our own operations or in our supply chains.

- We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our supply chain.
- Silver Fern Farms operate a number of policies such as: Human Resources, Procurement, Fraud and Whistle-blower Protection, Environmental, Health and Safety, Ethics and Sustainability policies. These are all signed off at Chief Executive or Company Director Level.
- We protect whistle-blowers and encourage all employees to raise concerns about potentially unethical or illegal conduct, while assuring confidentiality and protection against retaliation or any form of harassment. Systems have been put into place to make it easy for our employees to disclose any concerns they may have regarding such practices with the company.
- Employees are also encouraged to report any concerns about slavery or human trafficking that they may suspect or may have witnessed outside of the Group, whether or not they have become aware of such during the performance of their employment.

## Risk assessment and due diligence process

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### Recruitment

- We comply with applicable employment laws relating to employee terms and conditions and constantly work to build an engaged and collaborative employee culture.
- New Zealand has strict immigration employment and anti-Slavery and Human Trafficking regulations which we adhere to. There are strong independent monitoring processes in place in our country of origin.

### Procurement

- To identify and mitigate risk in our supply chain, we have a Procurement Policy and Procurement Standards which prescribe the process for appointing new suppliers, conducting supplier due diligence, contracting, establishing supply relationships, and transacting.
- Thereafter, we have established systems to identify, assess and monitor potential risk areas in our supply chain.

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**Future steps**

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- Throughout 2018, we will continue to monitor the risk of slavery and human trafficking in its supply chains and its own business, and will act accordingly. Our statement in respect of 2018 will be published at the beginning of the following year.
- We will partner with other organisations and companies to collaborate in areas that advance shared aims and aspirations.



**Simon Limmer**  
**Chief Executive**

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