
Slavery and Human Trafficking Policy

Valid Until – Dec 2022

Adopted: Q1 2017	Document Name: Slavery and Human Trafficking Policy	Policy Owner: Justin Courtney – Head of Communications and Sustainability	Approved By: CEO	Signature:	Last Review: 28-05-19	Next Review: Dec 2022
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Policy Statement: Slavery and human trafficking

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.

- 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.

Organisational Structure and Supply Chain

Silver Fern Farms is a New Zealand Silver Fern Farms is a marketer, processor and exporter of premium quality lamb, beef, venison and associated products.

- Our headquarters are in Dunedin, New Zealand and Silver Fern Farms has 14 processing plants across New Zealand with over 7,000 staff in the peak of the season. Silver Fern Farms has over 16,000 sheep, beef and deer farmer partners.
- We operate in various countries around the world and have offices in China, Dubai, Germany, USA and the UK. We build long-term partnerships with distributors and customers alike and supply products for retail, foodservice, wholesale, hotels and restaurants, manufacturing customers as well as directly to customers.
- Silver Fern Farms had a global turnover of \$2.4 billion in 2018.

Policies

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

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 a Procurement Standard which prescribe the process for appointing new suppliers, conducting supplier due diligence, establishing supply arrangements, executing supply contracts as well as making purchases and placing orders.
- Thereafter, we have established systems to identify, assess and monitor potential risk areas in our supply chains. Where particular products, services or geographies present a higher sustainability risk, additional assessment and monitoring procedures may be applied.


Signed: Simon Limmer, CEO. June 2019

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