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## MONTAGUE MODERN SLAVERY STATEMENT 2022

### MANDATORY CRITERION 1 REPORTING ENTITY

The Modern Slavery Statement (**Statement**) is made on behalf on Montague Bros Holding Pty Ltd (ACN 88 006 001 332) and includes all entities it owns and controls (collectively **Montague**), pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**).

The Montague entities covered by this Statement are as follows:

- Montague Bros (Holding) Pty Ltd
- Montague Bros Pty Ltd
- W.F. Montague Property Pty Ltd
- Montague Fresh (Aust) Pty Ltd
- Legana Orchards Pty Ltd
- Montague Cold Storage Pty Ltd
- Montague Fresh (Qld) Pty Ltd
- Pinelodge Lease Pty Ltd
- NWN Development Pty Ltd
- Shanghai Montague Trading Co Ltd

This Statement sets out the actions taken by Montague to identify, assess and address the modern slavery risks across our operations and our supply chain network in the last financial year, ending 31<sup>st</sup> March 2022.

### MANDATORY CRITERION 2 ABOUT MONTAGUE

Montague was founded by William (Bill) Montague in 1948. Initially focusing on the provision of produce to hospitals in Melbourne, it grew on the back of a commitment to service. During the 1950s the business diversified into the production of apples. Starting with one orchard in Narre Warren, Victoria, the business expanded in the 1990s to over ten orchards in three states, and entry into the Queensland wholesale fruit and vegetable market. By the 2000s, Montague expanded into the production of stone fruit and entered into numerous licensing agreement with worldwide fruit breeders to develop new fruit varieties.

Today Montague remains a 100% family-owned entity. With a turnover exceeding \$150 million, Montague currently manages over 30 varieties of apples and over 120 varieties of stone fruits. Servicing all sectors of the Australian domestic market and exporting to Asia, Europe the Middle East and North America Montague employs 350 employees located in regional and metropolitan locations in four Australian states.

### MONTAGUE OPERATIONS

As of the 31<sup>st</sup> March 2022, Montague's focus on providing exceptional delivery of products and services was achieved via seven distinctive business units:

#### Orchard Production

Orchard production over seven sites across South Eastern Australia, covering over 500 hectares and over 750,000 trees and vines.

#### Fruit Packing

Fruit packing takes place in two sites – Brisbane and the Narre Warren facility in Melbourne which collectively process more that 22 million kgs of fruit annually. In addition, Montague works with third party packing services who collectively process over 17 million kilograms annually.

## **Logistics**

A logistics business providing warehousing and transport services to the fresh produce industry, moving approximately 20 million kilograms of raw product to our packing facilities, and undertaking over 12,500 movements of finished goods to our customers.

## **IP Management**

An intellectual property management business which commercialises new fruit varieties in partnership with local and Australian growers and fruit breeders around the world, in addition to managing the associated trademarks.

## **Wholesale Trading**

A wholesale trading business at the Brisbane fruit and vegetable market trading in fruit, vegetables, and exotics in conjunction with serving the independent retail sector.

## **Fruit Trading**

A fruit trading business which buys and sells product from more than 100 growers and services the Australian and export markets with fruit.

## **Montague Hospitality**

A restaurant and retail division which offers quality food products direct to consumers.

## **MONTAGUE SUPPLY CHAINS**

Montague has over 2000 suppliers, ranging from family-owned, small to medium sized business and international operations. The bulk of our suppliers are fruit growers across Australia, with over 100 providing product to Montague during the reporting period.

Other key suppliers include the following:

- Those providing equipment and machinery for our production facilities and our orchards.
- Those servicing the equipment and machinery.
- Those providing products and services to the hospitality and retail division.
- Providers of materials used for the packing of product.
- Transport and logistics organisations responsible for the delivery and distribution of our products.
- Marketing and related corporate services required to support business operations.
- Providers of essential IT platforms and related services.
- Registered Casual labour hire companies.

## **MANDATORY CRITERION 3**

### **RISK OF EXPOSURE TO MODERN SLAVERY**

Using the Modern Slavery Risk Indicator Tool provided in the [Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities](#), we assessed the risk of exposure in both our Operations and our Supply Chain, during the reporting period.

Montague defines “Modern Slavery” as any of the following:

- Deceptive recruitment.
- Underpayment of wages and benefits.
- Exploitation of migrant workers.
- Forced labour.
- Bonded labour.
- Excessive work hours.

### **MONTAGUE OPERATIONS**

Our assessment of Montague Operations determined that we have a relatively low risk of modern slavery within our entities. And while Montague operates within the agriculture industry, a sector often associated with heightened modern slavery risks, all our direct employees are based in Australia. Additionally, all employees are covered under an individual employment contract or a registered enterprise agreement. In both cases we are committed to ensuring all terms and conditions comply with applicable National and State based labour laws, while also ensuring they are aligned with the appropriate Award.

Montague is also focused on the health and wellbeing of all employees and dedicates considerable time and resources to providing programs aimed at supporting both the physical and mental health of all our workforce.

### **MONTAGUE SUPPLY CHAINS**

Montague has over 2000 suppliers with approximately 95% Australian owned. Growers account for around 100 of those suppliers, with 98 based in Australia and 2 based in the US.

As previously highlighted, agriculture is an industry that is recognised to have higher modern slavery risks due to the high reliance on human intervention, the remoteness of locations and the relatively tight delivery timeframes. Combine these factors with a heavy dependence upon the use of unskilled, temporary, or seasonal labour, foreign workers, and outsourcing, we recognise that there is a medium to high risk of modern slavery exposure within some sectors of our supplier network.

With respect to the use of seasonal workers in Montague Orchards, we predominantly engage with a reputable recruitment company Connect. They operate at the highest standards and provide a team of approximately 50 Nevans each year. This labour force is provided secure accommodation and are employed in accordance with relevant legislative requirements.

It should be noted that COVID-19 has had an impact on the risk of Modern Slavery in agriculture. Labour shortages have been experienced with limited casual and contract farm workers available from overseas or from interstate in Australia. This has been due to less workers holding visa or seasonal worker permits, as well as persistent international and domestic border closures putting pressure on labour availability. While we acknowledge we have less jurisdiction over our grower network, and acknowledge the impact COVID-19 has had, we are very conscious of the need to ensure that growers are also compliant with regards to minimising modern slavery risks. To validate we are regularly in contact with growers to ascertain their labour hire practices. During the reporting period we also (where COVID-19 travel restrictions permitted) visited our grower network on a regular basis and continued to work with them to assist in securing seasonal labour from reputable labour providers, when required.

### **MANDATORY CRITERION 4**

#### **ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISK, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES**

Montague is committed to working with all stakeholders, in both our operations and our supply chains, to assess and address the risk of modern slavery.

Our obsession with providing quality fresh products and delivering exceptional customer services extends beyond focusing on our food safety and quality management systems. We are equally serious about ensuring the welfare of all workers and are committed to providing employees with the support they need to uphold the highest levels of responsible, safe, and ethical practices within Montague.

This commitment extends to our grower/supplier network, with a focus on ensuring that they are aware of the relevant policies and have access to the necessary training and documentation to ensure compliance.

To that end we regularly review, up-date and communicate our policies and procedures to ensure relevance and compliance with the applicable legal requirements. More specifically the following policies are in place across the organisation:

***Human Rights, Ethical Sourcing and Social Responsibility Policy***

This is based primarily on the Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions. This policy seeks to reinforce Montague's commitment to sourcing products in an ethical and responsible manner, and considering the welfare of workers, health and safety and potential environmental impacts.

***Sexual Harassment Policy and Procedure***

Montague acknowledges that sexual harassment and sexual assault are unlawful. Montague is committed to creating a work environment which is free of sexual harassment for all members of the Montague community. Federal and state legislation requires Montague to take all reasonable steps to prevent and eliminate sexual harassment, and to protect those who complain of victimisation. Montague will take all reasonable steps to ensure that no member of the community subjects another person to or is subjected to sexual harassment whilst in the course of any Montague activity.

***Sustainable Development Policy***

While focused on the importance of protecting and maintaining the environment, this Policy also promotes the need for all workers to be aware of their obligations in respect to community health and heritage which may also be impacted by the organisation's activities.

***Whistleblower Policy***

The purpose of this Policy is to reiterate Montague's commitment to upholding the highest standards of conduct and ethical behaviour in all our business activities, and to promote and support a culture of honest and ethical behaviour, corporate compliance, and good corporate governance.

***Grievance Resolution Policy***

The purpose of this Policy is to ensure employees have a mechanism to address grievances as well as have the confidence that Montague will equally deal with grievances in a fair and equitable manner based on procedures that are appropriate, accessible, and easily understood.

***Theft Fraud & Corruption Policy***

Montague is committed to fostering integrity in its workplace and is opposed to all forms of theft, fraud, corruption, and non-compliant activity. This policy defines these improper activities and the resulting suspension or termination of employment of any employee found to be engaging in such criminal behaviour.

***Discrimination, Harassment and Workplace Bullying Policy***

At Montague we value every employee's right to be treated with respect, dignity and courtesy. The Company recognises discrimination, harassment and workplace bullying all violate state and federal employment laws and will not be tolerated.

***Conduct & Counselling Policy***

Montague aims to encourage the highest standards of conduct among its employees. This policy was developed to assist in improving the standard of conduct and performance of employees.

***Diversity & Equal Employment Opportunity Policy***

Montague appreciates the value inherent in a diverse workforce and values the differences of people regardless of origin, age, gender, race, cultural heritage, lifestyle, education, physical ability, appearance, language, or any other factor. This policy outlines our commitment to creating and maintaining a diverse and inclusive organisation, and ensuring all employees are treated with respect and dignity.

### ***Health, Safety & Wellbeing Policy***

Montague strives to achieve exceptional health and safety performance through its commitment to providing workplaces that are healthy and safe. The policy outlines the health and safety objectives in place.

### ***Code of Conduct Policy***

Montague is committed to the highest level of integrity and ethical standard in all business practices. It is expected that all employees must conduct themselves in a manner that is consistent with the current community and corporate standard, and in compliance with all legislation. The policy outlines Montague's values and expectations for all employees.

### ***Learning & Development Policy***

Montague believes employee learning and development plays an integral part in the achievement of its business objectives, and that high quality, engaged employees provide the business with a competitive advantage. Therefore, Montague is committed to investing in the personal and professional development of its employees.

### ***AFPA Membership***

In addition to the Policies listed above, Montague is a member of AFPA (Australia Fresh Produce Alliance). As part of AFPA's charter they are committed to improving the agriculture sector's employment practices and reputation, including proactively meeting all health and safety, employment, and duty of care requirements and obligations. As a member of AFPA, Montague has access to up-to-date information regarding best-in-class ethical business practices within the industry. Additionally, we have the opportunity to network with senior leaders within similar organisations to share learnings in regard to mitigating the risk of modern slavery, both internally and within the supply chain.

## **MANDATORY CRITERION 5**

### **ASSESSING EFFECTIVENESS OF MODERN SLAVERY RISK MANAGEMENT**

#### ***SEDEX and SMETA***

As part of Montague's commitment to assessing and addressing modern slavery risks, the organisation undertakes an annual SMETA (SEDEX Members Ethical Trade Audit) This audit is a procedure created by the SEDEX (Supplier Ethical Data Exchange) not-for-profit, membership organisation, that leads work with buyers and suppliers to deliver improvements in responsible and ethical business practices in global supply chains.

SMETA is based on the conventions of the International Labour Organisation (ILO) and provides a globally recognised certification for compliance in responsible supply chain activities and ethical good practices.

During the reporting period Montague complied with all SMETA standards and continues to invest in educating our workers and suppliers to ensure this compliance is maintained.

Supplier engagement is also crucial to this process, with regular discussions and visits to growers and other major suppliers undertaken during the reporting period. These interactions are aimed at assessing and addressing any potential issues regarding food safety, food quality and ethical sourcing practices.

**MANDATORY CRITERION 6**  
**CONSULTATION ON PREPARING A JOINT STATEMENT**

In the process of developing this Statement, Montague consulted with the relevant entities that it owns and controls. The Statement was approved by the Managing Director and endorsed by the Board of Montague.



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Scott Montague  
Managing Director  
Montague Bros (Holding) Pty Ltd



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Michael Naphtali  
Chairman  
Montague Bros (Holding) Pty Ltd

Date approved: (Insert date)  
27/10/2022