



**SERVICE
FOODS**

BEHIND EVERY
GREAT CHEF

SERVICE FOODS MODERN SLAVERY POLICY

SEPTEMBER 2025

SERVICE FOODS LIMITED

HR & Payroll team

Modern Slavery Policy

This policy outlines Service Foods Limited's approach to preventing modern slavery and human trafficking. It reflects our ongoing commitment to continuous improvement in identifying and mitigating risks, and to ensuring that our practices and partnerships align with our values and legal obligations.

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1. Objective

At Service Foods Limited (Service Foods/SFL/the business/Our/us), we are committed to upholding the highest standards of ethics, integrity, transparency, and accountability across all areas of our business. We recognise that every member of our team plays a vital role in supporting and maintaining these values.

Service Foods is dedicated to acting ethically and with integrity in all our operations, facilities, and supply chains. We are firmly opposed to all forms of modern slavery, including forced labour, human trafficking, and exploitation. We take proactive steps to identify, prevent, and address any risks related to modern slavery within our business and among our suppliers.

2. Scope

All individuals working for the business or on our behalf in any capacity, including all levels of employees, directors, officers, agency staff, seconded employees, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners, are subject to the terms of this policy.

3. Summary of risk of modern slavery

SFL employs around 775 people based at 17 sites across New Zealand. New Zealand placed 5th globally in the 2024 Corruption Perceptions Index (CPI) published by Transparency International, for perceived public sector integrity which places New Zealand at low risk of modern slavery.

The HR & Payroll team of Service Foods have systems in place to support compliance to New Zealand employment law. The main risks of modern slavery with our business are non-compliance to the business and NZ requirements by people managers, and the engagement with suppliers (especially those that import products) that are not mitigating risks of modern slavery in their operations.

4. Our Commitments

- 4.a. **Zero Tolerance:** We have a zero-tolerance policy towards modern slavery and employee exploitation within our organisation and from our suppliers.
- 4.b. **Compliance with Laws:** We are committed to complying with all relevant laws and regulations related to modern slavery and employee exploitation in New Zealand.
- 4.c. **Employee Rights:** We respect the rights of all our employees, including the right to fair wages, safe working conditions, and freedom from coercion or harassment. We will actively promote an inclusive and supportive work environment where all employees feel valued, respected and have opportunities to speak up.
- 4.d. **Transparency and Accountability:** We will maintain transparency and accountability in our efforts to combat modern slavery within our organisation. This includes regular assessments of our recruitment processes, employment practices, payroll processing and working conditions to identify and address any risks of modern slavery.

- 4.e. **Training and Awareness:** Service Foods ensure that employees have access to information about their employment rights, people managers are trained on modern slavery and employee rights, and those involved in approving suppliers on the risks of modern slavery. This policy is publicly accessible on the SFL website for our suppliers to access.
- 4.f. **Supplier Engagement:** We are committed to partnering with suppliers and service providers that comply with our values and ethical standards, including the prohibition of modern slavery.
- 4.g. **Continuous Improvement:** We understand that the fight against modern slavery is an ongoing process that requires continuous improvement and vigilance. We are committed to regularly reviewing and updating our policies, procedures, and practices to ensure their effectiveness in preventing and addressing modern slavery within our organisation.

5. Definitions

- 5.a. **Modern slavery** - "Severe exploitation that a person cannot leave due to threats, violence or deception. It includes forced labour, debt bondage, forced marriage, slavery, servitude, child labour and human trafficking." <https://www.mbie.govt.nz/have-your-say/modern-slavery>.
- 5.b. **Employee exploitation** -Includes significant breaches of New Zealand's employment standards. Employee exploitation may be defined as modern slavery when there is an element of coercion or control. *"When workers' employment rights are not respected, or when employers don't meet minimum employment standards, or meet health and safety or immigration requirements, workers are being exploited"*.
- 5.c. **Employees** refer to workers, directors, managers, agency staff, independent contractors and volunteers of the business.
- 5.d. **Supplier** means a person who supplies goods or services to the business (whether paid or unpaid) and any employees of the Supplier.
- 5.e. **Supply Chain** is defined as the products and services (including labour) that contribute to the Company's business. This includes products and services sourced in New Zealand or overseas and extends beyond direct suppliers.

6. Responsibilities

- 6.1. **All Service Foods employees have a responsibility to:**
 - 6.1.a. Understand, comply with, and not engage in any actions that could be a breach of this policy.
 - 6.1.b. Immediately report any potential modern slavery or employee exploitation they encounter or witness in the business' operations or supply chains.
 - 6.1.c. Complete or seek training to better understand the risks of Modern Slavery, as required by the business.

6.2. GM - National Procurement and Supply Chain of the business is responsible for:

- 6.2.a. Implementing this policy, overseeing its application and efficacy, responding to inquiries about it, and reviewing processes to make sure they are effective in preventing modern slavery for the supply chain.
- 6.2.b. Ensuring SFL Category Managers, buyers and others that may approve supply chain have received and completed training on modern slavery and this policy.
- 6.2.c. Arranging for internal or external investigations into alleged employee exploitation or modern slavery within the supply chain.
- 6.2.d. Ensuring that supply chain related policies and procedures include modern slavery risk mitigation where relevant e.g. supplier code of conduct and the approved supplier programme.
- 6.2.e. Updating this policy when required due to changes in legislation, customer requirements, and/or identification of areas of improvement around the supply chain at Service Foods.
- 6.2.f. Conduct or facilitate an annual review that includes:
 - i. Annual audit or assessment of risks of modern slavery within the supply chain.
 - ii. Any changes in New Zealand legislation or relevant international guidance.
 - iii. Review of customer requirements.
 - iv. Review of all reports of modern slavery in the SFL supply chain since the last review for areas of improvement in policies, procedures and training.
 - v. Reporting on modern slavery in the supply chain for the SFL annual ESG report.

6.3. Service Foods' Category Managers and buyers are responsible for:

- 6.3.a. Ensuring due diligence is conducted when arranging imported products for supply or use by Service Foods.
- 6.3.b. Ensuring that all regular suppliers have gone through the approval process including being issued with this Modern-slavery policy, and the Supplier code of conduct.

6.4. HR & Payroll team of the business is responsible for:

- 6.4.a. Implementing this policy, overseeing its application and efficacy, responding to inquiries about it, and reviewing processes to make sure they are effective in preventing modern slavery for the business operations.
- 6.4.b. Staying ahead of changes in New Zealand legislation around employee rights along with international changes impacting SFL customer requirements.
- 6.4.c. Educating our People managers on New Zealand employment law and business expectations on the fair treatment of employees.
- 6.4.d. Ensuring People managers have received and completed training on modern slavery and this policy.
- 6.4.e. Providing and updating the business' employee/team member handbook and Individual Employee Agreement to ensure that information on basic employee rights is included, for example - leave, rest and meal break entitlements.
- 6.4.f. Arranging for internal or external investigations into alleged employee exploitation or modern slavery within SFL operations.
- 6.4.g. Ensure all employees are paid in accordance with New Zealand employment law, including

minimum wage requirements and entitlements.

- 6.4.h. Reviewing annual culture survey questions to provide an avenue to identify risks of employee exploitation.
- 6.4.i. Maintain accurate and up-to-date records of visa conditions, expiry dates, and work rights for all temporary visa holders to ensure compliance with Immigration New Zealand (INZ) regulations.
- 6.4.j. Ensure timely follow-up with employees and People Managers to prevent any breaches of temporary visa conditions. Under no circumstances should wages or entitlements be withheld from employees—regardless of visa status— due to visa-related issues or work conditions.
- 6.4.k. Must not accept or solicit any form of payment, services, or favours in exchange for job offers, employment opportunities, visa support, promotions, or any kind of work-related benefits.
- 6.4.l. Respond to customer requirements for information about the SFL modern slavery policy and processes.
- 6.4.m. Conduct or facilitate an annual review of this policy and its implementation, including:
 - i. Audit or assessment of risks of modern slavery within operations.
 - ii. Any changes in New Zealand legislation, Immigration NZ requirements or relevant international guidance.
 - iii. Review of all instances that could be considered modern slavery and/or employee exploitation since the last review for areas of improvement in policies, procedures and training.
 - iv. Reporting on modern slavery in operation for the business' annual ESG report.
 - v. Regular audits of Payroll processes, temporary visa validity and compliance.
 - vi. Review of customer requirements.

6.5. People Managers have the responsibility to:

- 6.5.a. Monitor the working environment to ensure there are no risks of Modern Slavery.
- 6.5.b. Ensure that New Zealand employment law and the business processes are followed to ensure all employees are treated lawfully and fairly.
- 6.5.c. Ensure that New Zealand Health and Safety law and business policies and procedures are complied with to maintain a healthy and safe workplace for all employees.
- 6.5.d. Understand rules regarding immigration for any migrant employees.
- 6.5.e. Seek advice from the HR & Payroll team, or the approved external employment advice specialists if unsure if practices may constitute as slavery or exploitation.
- 6.5.f. Follow the risk mitigations specified in this policy to minimise the risk of employee exploitation and modern slavery.
- 6.5.g. Must not require or request anyone working underneath them to complete work outside of what is in SFL employment agreements, unless under a legal employment framework (for example secondary employment contract for a legal NZ company). This includes unpaid work or activities.

- 6.5.h. Must not require or request employees on temporary work visas to work in breach of their visa conditions, allow to work illegally, nor withhold wages for any such breaches.
- 6.5.i. Must not accept or solicit any form of payment, services, or favours in exchange for job offers, employment opportunities, visa support, promotions, or any kind of work-related benefits.
- 6.5.j. Must not request, encourage, or arrange for any employee under their supervision to loan them money, including managers seeking loans from their direct reports.

7. *Risks of Modern Slavery in Our Operations and Supply Chain — and Mitigation Measures:*

OPERATIONS

RISKS	MITIGATION THROUGH POLICY AND PROCEDURES
1. Employment law not being followed by managers of the business. 2. Vulnerable employees not knowing their rights or not having alternate options (those with mental impairment, those who have suffered domestic abuse, elderly employees, unskilled employees).	• Whistleblower policy and Whistleblower hotline available for all staff to confidentially report wrongdoing. • All recruitment is done through the online recruitment platform managed by the HR team. • The business has access to a 24/7 helpline to an external employment relations consultancy who provide expert advice on meeting NZ employment law. This is accessible to all relevant people managers. • Access for all employees to a confidential Employee Assistance Programme. • Payroll is managed by the HR & Payroll team through an application designed to ensure compliance to New Zealand laws. • A careers pathway programme is in development to give opportunities for development and advancement for the majority of roles. • Performance review, market pay rates, and remuneration are transparent processes managed by the business HR & Payroll team. • NZ-owned and operated business with knowledge on NZ employment law. • Identification of areas for improvement in workplace culture and safety through annual confidential employee surveys.

3. Migrant employees not knowing their rights or fearing deportation if they do not do what employer asks.	• People managers of migrant employees understand the work visa requirements and ensure that they do not permit or request work that is in breach of work visas. • All hours worked by migrant employees are recorded through the payroll system to ensure compliance with visa conditions and wage requirements. • All migrant employees whose visas are linked to Service Foods are provided with a settlement information pack outlining their rights, available support, services and key employment details.
4. Child labour as they may not know their employment rights, are at risk of having education impacted by working hours.	• SFL do not employ anyone under the age of 16. • Anyone employed aged between 16 – 18 is only employed through an apprenticeship programme, or in days/hours that does not impact schooling, such as during school holidays and/or weekend work. • No one aged 16-18 years works or volunteers in potentially hazardous environments. At Service foods, this include but is not limited to; food processing (butchery, prepared produce, Seafood processing). The only exception is through an accredited apprenticeship programme that includes health and safety training. • Age is recorded in payroll records for all employees under the age of 20. • Age verification is completed using valid identification as part of the onboarding process for all new employees.
5. Contractors/Agency staff that work onsite for SFL Operations. Risk that their employer is exploiting staff.	• Clear contract with contractors for labour used onsite (e.g. deboners in butchery) that outlines requirements for employment conditions of the contractors.

6. Unsafe conditions of work	• Robust Health, Safety, and Wellbeing policies and procedures. • PPE provided for all employees and contractors. • Employee Representation process through annual elections of Health & Safety Representative. • Health & Safety reporting framework • SFL Board oversight of Health, Safety, and Wellbeing. • Addressing bullying, harassment and discrimination policy • Building evacuation drills and designated emergency plans and fire wardens.
7. Staff employed on casual contracts at risk of unlawful zero-hour contracts	• Casual employment contracts do not include unlawful zero-hour contract provisions, such as requiring acceptance of work with no guaranteed hours.

SUPPLY CHAIN

RISKS	MITIGATION THROUGH POLICY AND PROCEDURES
1. All suppliers 2. Exploitation of migrant employees	• Approved Supplier Programme including supplier approval process that looks into risk of slavery in the supply chain. • Any knowledge of modern slavery or employee exploitation will result in the supplier being investigated and may be prohibited from trading with SFL unless able to demonstrate improvements. • SFL policies provided to new vendors: Supplier Code of Conduct and Modern Slavery Policy. • Procurement Policy.
3. Imported products	• Site visits conducted by GM - National Procurement and Supply Chain for our main manufacturers of imported products.

8. *Protected disclosure*

- 8.a. Service Foods seeks to promote openness and will assist anyone who raises sincere concerns in accordance with this policy, even if they are later proven to be incorrect.
- 8.b. The business is dedicated to making sure that no one experiences unfavourable treatment because of reporting a complaint. Dismissal, reprimands, threats, or other negative treatment because of raising concern/s are considered detrimental treatment.
- 8.c. Employees should notify the HR & Payroll team via hr@servicefoods.co.nz if they suspect they have received such treatment.

9. *Reporting breaches and commitment to remedy*

- 9.1. Anyone who suspects a breach of this policy must report it using one of the following channels:

9.1.a Employees:

- Report directly to their manager.
- Contact the business HR & Payroll Team via hr@servicefoods.co.nz.
- Use the confidential Whistleblower line, details of which are available in the employee handbook and displayed on posters at each site.
- Report to the GM – National Procurement and Supply Chain for concerns related to modern slavery in our business or supply chain.

- 9.2. External parties may refer to the contact details listed under the document owner section of this policy.

9.3 **Commitment to remedy:**

9.3.a. Actual or suspected breach in relation to employees of the business:

- i. Employee Assistance Programme (EAP) is offered and encouraged to assist the alleged victim in dealing with the negative impacts of being exploited.
- ii. The HR & Payroll Team of the business works within the legislative framework to find solutions to support migrant.
- iii. An investigation is initiated by the HR & Payroll team or appropriate internal or external delegate into the alleged perpetrator at Service Foods.
- iv. Any employee who breaches this policy will be subject to disciplinary action in line with the business' Code of Conduct, which may include gross misconduct or termination for misconduct.
- v. Following confirmation of employee exploitation or modern slavery within the business operations, the HR & Payroll team will review this policy and the training process to identify if changes are needed to ensure timely action to prevent recurrence.

- 9.3.b. If other people or organisations operating on our behalf breach this policy, Service Foods has the right to end their contractual relationships with them.

9.3.c. Suspected breach in relation to a supplier or service provider:

- i. Consideration by the GM - National Procurement and Supply Chain on if the supplier should be suspended from engagements with SFL until an investigation clears the company of wrongdoing or demonstrates that controls have been established.
- ii. For New Zealand companies, consider if there is adequate information to report to the Police, Government agencies and/or Immigration NZ for them to investigate suspected breaches.
- iii. For overseas companies, consider if there is adequate information to report to that country's relevant authorities. .
- iv. Suppliers with confirmed breaches that have not demonstrated improvements to human rights practices will be discontinued from a supply relationship with Service Foods.

10. References

A. New Zealand Legislation

- Immigration Act 2009 - Section 351 criminalises the exploitation of migrant employees.
- Crimes Act 1961 - Sections 98 and 98D criminalise human trafficking and slavery.
- Employment Relations Amendment Act 2016
- The Worker Protection (Migrant and other Employees) Act 2023
- The Holidays Act 2003 - the primary legislation for employee holiday rights in New Zealand.
- Family Violence (Amendments) Act 2018 amended the Crimes Act to criminalise forced marriage.
- Education and Training Act 2020 prohibits employing children under 16 during school hours or when it would interfere with their attendance at school.
- The Health and Safety at Work Act 2015
- The Health and Safety at Work (General Risk and Workplace Management) Regulations 2016 places restrictions on hiring children under the age of 15 to do hazardous work.

B. Other guidance documents

- International Bill of Human Rights
- International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work.

11. DOCUMENT DETAILS:

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