

hsk  
ward  
group



# Modern Slavery Statement

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Financial Year 2024-25

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**M<sup>c</sup>KENZIE'S**  
FOR EVERY DAY SINCE 1852

**FTA** Food Solutions  
Supplying Food, Delivering Solutions

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● INTRODUCTION ● INTRODUCTION ● INTRODUCTION ●

# CEO Statement

Since 1853, we have been a trusted link between growers and consumers – an Australian family-owned business built on generations of integrity, quality and innovation.

At HSK Ward Group, we believe that our community – the people behind our brands, our partners across the world, and our customers here in Australia – remain at the heart of everything we do. It's their dedication that keeps our longstanding brands distinct, agile and visionary as we continue our work to revolutionise the journey from farm to plate.

We take pride in sourcing the finest ingredients, maintaining long-term relationships with suppliers, and using technology to deliver seamless food solutions that enrich everyday life.

Our global supplier network reflects the diversity and scope of the modern food industry. Through collaboration and shared values, we work closely with growers and producers to uphold the highest standards of quality, safety, and responsibility. We remain deeply committed to ensuring that every part of our supply chain is conducted with the highest ethical practices and respect for human rights.

-  **FAMILY**, it's what drives us
-  **SAFETY**, people matter
-  **DIVERSITY**, strength in difference
-  **TEAMWORK**, stronger together
-  **RESPECT**, it works both ways
-  **INTEGRITY**, doing the right thing

We are proud of our people – their dedication, curiosity and care are what drive us forward. Whether it's through day-to-day operations or long-term initiatives, we are united by a shared purpose: to do business the right way, for the good of our customers, communities and the planet.

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HSK Ward acknowledges the importance of combating modern slavery and human trafficking in all its forms. We are committed to acting ethically and with integrity in all our business dealings, ensuring modern slavery does not occur within our organisation or supply chains.

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This Modern Slavery Statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth), covering the financial year from 1/7/24 – 30/6/25. It outlines the actions taken by HSK Ward Group Pty Ltd, trading as FTA Food Solutions and McKenzie's to identify, assess, and address modern slavery risks across our operations and supply chain.

*Rob Marais*



STRUCTURE, OPERATIONS & SUPPLY CHAINS



# HSK Ward Group: Nourishing Communities

HSK Ward Group is an Australian-owned business trusted for six generations, committed to sourcing quality food, nurturing strong supplier relationships, and leveraging technology for seamless delivery.

**MCKENZIE'S**  
FOR EVERY DAY SINCE 1852

Our retail brand, McKenzie's, has been a staple in Australian kitchens since 1852, known for wholesome pantry essentials that support everyday cooking.

**FTA** Food Solutions  
Supplying Food, Delivering Solutions

In foodservice and industrial markets, we operate as FTA Food Solutions, providing competitively priced, high-quality products through an end-to-end supply-chain model that ensures reliable and timely delivery across Australia, New Zealand, and export channels.

# Organisational description

The HSK Ward Group is an organisation operating in various parts of the ANZ food & beverage industry.



Henwood Downs Pty Ltd provides administrative services to the group.

The group is headquartered in Melbourne & also has staff located in Brisbane, Sydney, Adelaide, Perth & Auckland.



Figure 1: Map of HSK Ward Group direct operations



McKenzie's Foods focusses on manufacturing & packaging consumer goods, especially "pantry staples", sold across the retail & food service channels.



FTA Food Solutions sources a wide range of food ingredients & additives globally & locally and supplies virtually every part of the food industry- including manufacturers & processors, wholesalers, food service outlets, QSR operations, retailers & export markets.



FTA Specialty Foods supplies frozen seafood to the industrial, wholesale, food service, QSR & retail markets.



FTA Coffee supplies roasters with certified carbon neutral green coffee beans.

# Supply Chain Overview

The intricate and diverse supply chain of the HSK Ward Group is outlined in the map.

The complexity of this network is shaped by our global sourcing strategies, many long-term partnerships, and ever-changing market demands. As this complex network of operators continues to develop, we remain focused on recognising and addressing the challenges involved in maintaining the highest ethical sourcing standards.

Global in scope, it highlights the multiple stakeholders involved in delivering high-quality products to our customers. From our agricultural producers and processing facilities to the distribution networks that connect us with consumers, each element of our supply chain plays a vital role in upholding our commitment to ethical sourcing and sustainability.

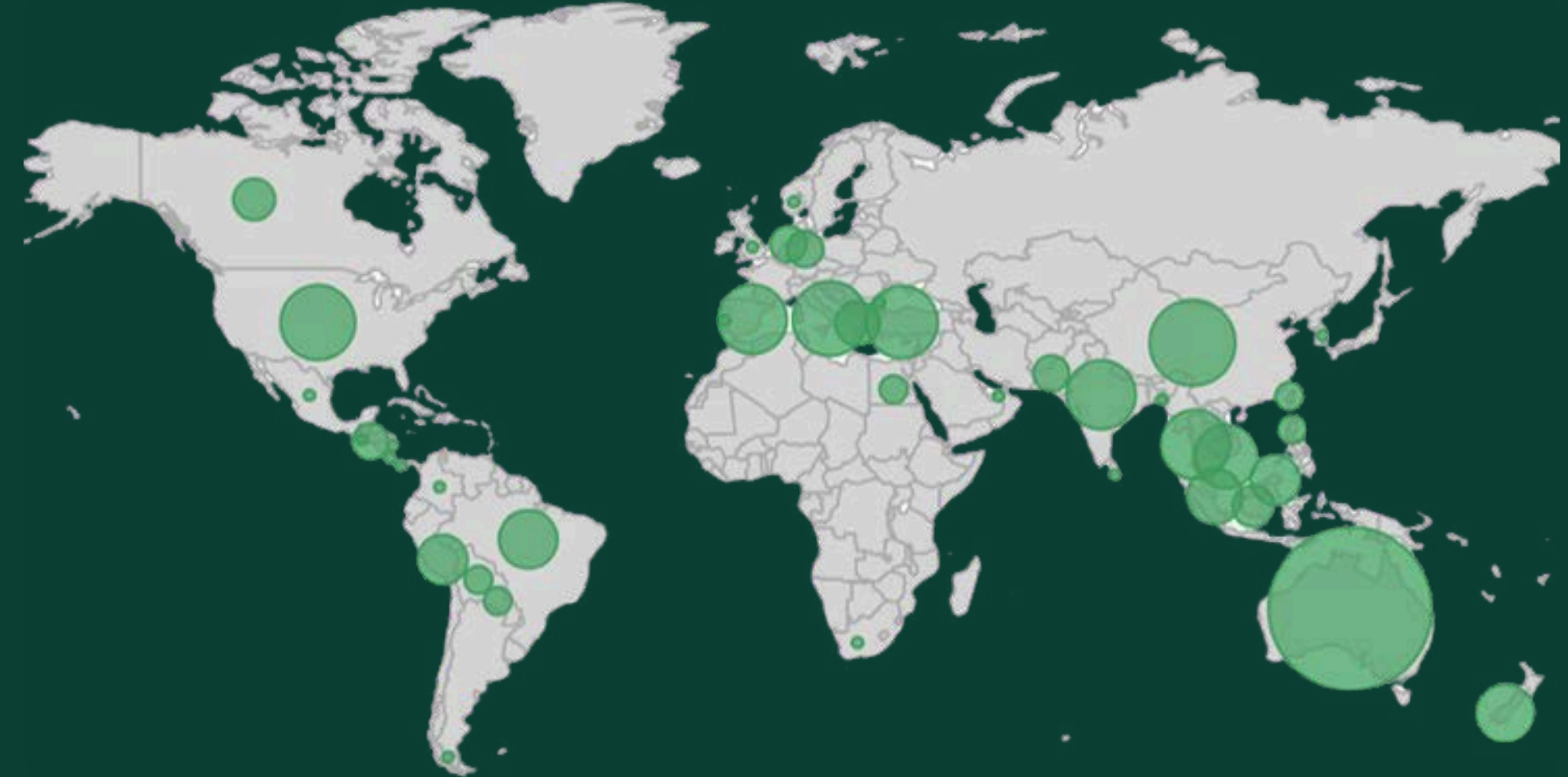


Figure 2: Map of HSK Ward Group global supply chain

### Number of HSK Ward Group vendors from each country:

Australia	162	Guatemala	3	Peru	4
Bangladesh	1	Hong Kong	1	Philippines	2
Bolivia	1	India	13	Singapore	7
Brazil	8	Indonesia	5	South Africa	1
Bulgaria	2	Italy	17	South Korea	1
Canada	5	Japan	1	Spain	11
Chile	1	Malaysia	6	Sri Lanka	1
China	20	Mexico	2	Switzerland	1
Colombia	1	Netherlands	2	Taiwan	2
Costa Rica	1	New Zealand	6	Thailand	17
Ecuador	1	Nicaragua	1	Turkey	17
Egypt	2	Norway	1	United Kingdom	1
El Salvador	2	Pakistan	4	United States of America	15
France	1	Panama	1	Vietnam	12
		Paraguay	2		



● RISK OF MODERN SLAVERY IN OPERATIONS & SUPPLY CHAINS ●

## **Risks of Modern Slavery in Operations and Supply chains**

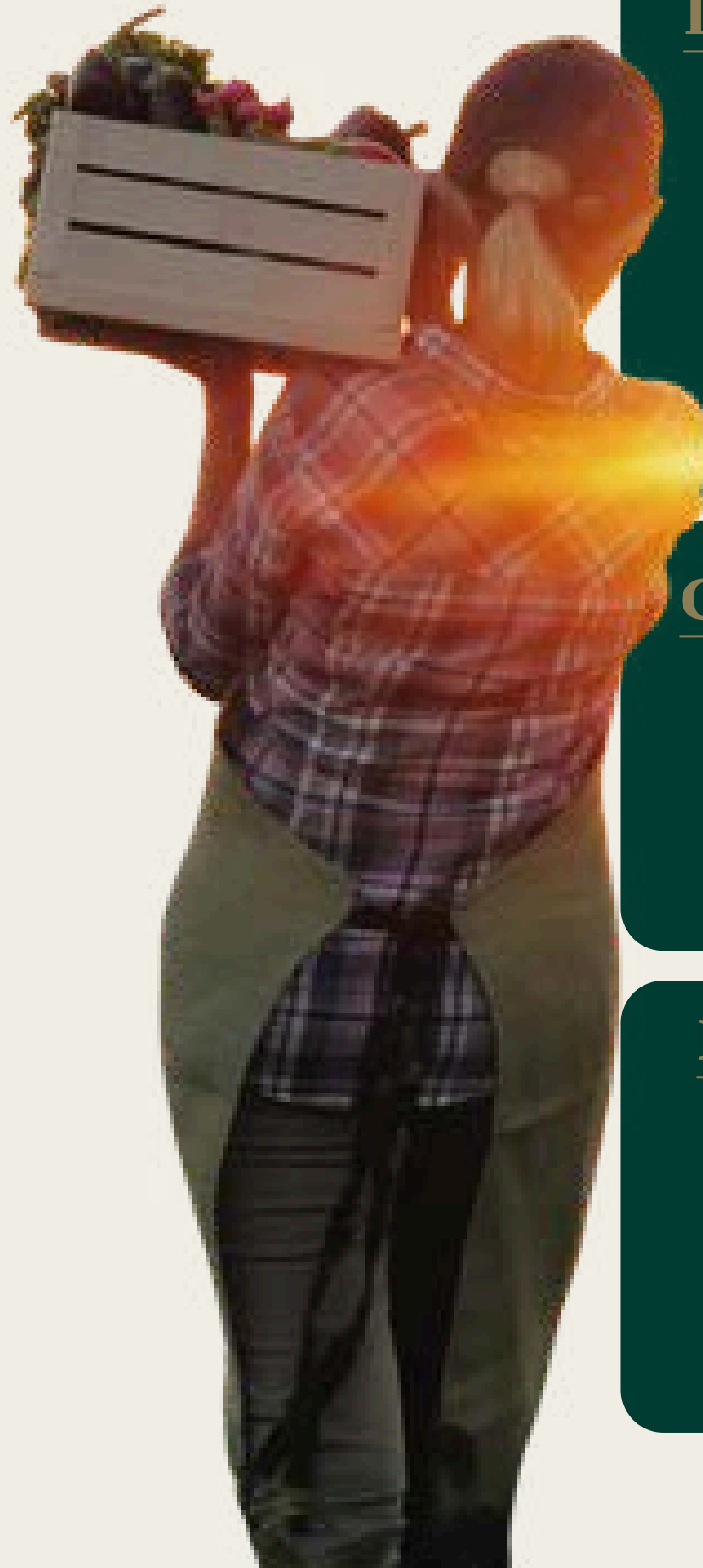
HSK Ward Pty Ltd operates within a global agricultural and food manufacturing context, sourcing products from diverse countries through a complex supply chain involving multiple **growers, processors, traders, and intermediaries.**

We acknowledge the inherent **modern slavery risks** present in food and agricultural supply chains and are committed to **upholding human rights and rejecting all forms of exploitation**, including human trafficking, forced and bonded labour, child labour, inherited servitude, forced marriage, and deceptive recruitment practices.

# Supply Chain Risks

The risk of modern slavery within HSK Ward's direct operations and local supplier network is considered low, given our presence in Australia and New Zealand and the regulatory controls that apply.

However, potential risk areas exist within our broader agricultural and food manufacturing supply chain:



## Indirect Sourcing

- **Reduced visibility:** Products sourced through export partners may limit visibility of working conditions across farms, producers, and logistics providers.
- **Broker risk:** Brokers focused on transactions rather than ethical oversight can increase exposure to unethical practices.
- **Audit limitations:** Indirect relationships can prevent independent inspections, reduce accountability and increase reliance on anecdotal assurances.

## Child Labour

- **Small-scale and family farming:** Children may be involved in production, sometimes in hazardous conditions.
- **Seasonal peaks:** Labour shortages during harvest may increase reliance on child labour, particularly where regulation is weak.

## Labour Risks

- **Migrant worker vulnerability:** Seasonal and migratory labour can be subject to wage withholding, document retention, and inadequate living conditions.
- **Remote operations:** Rural production areas may lack regulatory or NGO oversight.
- **Restricted mobility:** On-site accommodation can limit movement and contribute to forced labour or debt bondage.

## Country-of-Origin Risks

- Some sourcing regions are identified by global indices as having higher prevalence of modern slavery, requiring increased diligence.

## Shipping & Logistics

- Use of foreign-owned vessels employing international crews introduces additional risk due to limited transparency in maritime employment conditions.

**By identifying these risks, we aim to better target our due diligence efforts and promote ethical labour practices throughout our supply chain.**



# Specific Risks

Several product categories sourced and distributed by HSK Ward Group present elevated modern slavery risks. Key examples and associated controls include:

**Cocoa (Côte d'Ivoire, Ghana):** Risk identified by the U.S. Department of Labor (2024). Mitigated through sourcing Rainforest Alliance-certified cocoa.

**Palm Oil (Malaysia, Ghana):** While not procured directly, palm derivatives may be present in manufactured inputs. Risk is managed through our Roundtable on Sustainable Palm Oil (RSPO) trader licence.

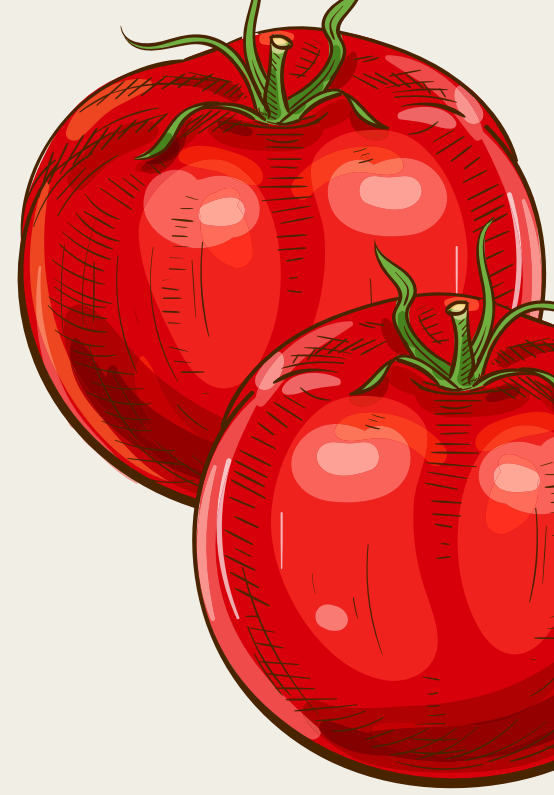
**Coconut (Philippines):** Managed through vendor assurance processes and long-term manufacturer relationships.

**Seafood (Thailand, Vietnam, Indonesia):** A category-wide vendor and product assessment has been completed in line with updated vendor approval processes. The company is also currently working toward Marine Stewardship Council (MSC) and Aquaculture Stewardship Council (ASC) certification.

**Coffee (Africa, Latin America):** Risks are mitigated through long-term direct relationships with growers. For high-volume brokered purchases, products are generally sourced under Rainforest Alliance certification.

**Nuts (Latin America):** Managed via vendor assurance processes and established relationships with regional brokers and manufacturers.

**Tomato Products (China):** Managed through engagement with vendors requiring declarations of origin and documented due diligence to prevent sourcing from entities linked to production within the Xinjiang Uyghur Autonomous Region.



● ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS ●



# Actions Taken to Assess and Address Modern Slavery Risk

HSK Ward Group has established a Modern Slavery platform designed to provide assurance, mitigate risk, and support remediation across our supply chain. It is aligned with recognised international frameworks, including the Ethical Trading Initiative Base Code, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. The platform is reviewed annually to ensure it remains current with evolving standards, legislation, and changes within our vendor base.

## Policy List

The Sustainability Manager is responsible for the development and distribution of policies related to the modern slavery platform, as well as the platform's ongoing maintenance. A full list of these policies is detailed below:

- *Grievance and Dispute Resolution Policy*
- *Child Labour Policy*
- *Conflict of Interest, Anti-Bribery and*
- *Anti-Corruption Policy*
- *Labour Rights Statement*
- *Modern Slavery Remediation Policy*
- *Modern Slavery Statement (this document)*
- *Procurement Policy*



# Supplier Due Diligence

Our due diligence process for preventing modern slavery as part of our continued engagement with suppliers, our ethical supply chain due diligence process has been refined over the past 12 months to improve efficiency and responsiveness while maintaining rigor.

Key components include: modern slavery in the supply chain is structured around a robust, three-pillar ethical assurance framework, integrating vendor screening, risk assessments, and targeted audits.

## **3iVerify**

Ethical due diligence is integrated into the Food, Safety & Quality (FSQ) onboarding process via the 3iVerify quality management platform, where all new vendors complete a questionnaire that includes ethical practice criteria.

## **Sedex Assessment**

Vendors are required to be members of the Sedex ethical supply chain management platform. HSK Ward holds Sedex Buyer membership, providing visibility of supplier data. The platform is first used to generate an overall risk rating, supported by vendor self-assessment questionnaires (SAQ/ESAQ). These results are used to refine the initial assessment and identify risk areas.

## **Continuous Monitoring**

Where possible, vendors undertake a Sedex Member's Ethical Trade Audit (SMETA). In regions where access to SMETA-trained auditors is limited, equivalent platforms such as EcoVadis or Amorfi are accepted. Audit findings are reviewed by the Sustainability Manager, with emphasis placed on corrective action plans and the severity of any non-compliances. Corrective action timelines are monitored internally, and follow-up audits are assessed to verify that all issues have been fully resolved.

## Training & Capacity Building

Internal training on policies relevant to modern slavery continues to be conducted regularly as part of employee induction processes, ensuring that our teams are well-versed in the practices and expectations of the business. Updates to internal ESG processes are also communicated at company-wide Town Halls and during fortnightly “What’s Cooking” company update sessions.

By fostering cross-departmental awareness and accountability, this training reinforces the organisation’s commitment to proactive due diligence and responsible sourcing practices.

## Grievance Mechanisms

To strengthen our response to potential modern slavery risks and support a transparent, safe, and accountable workplace, we are implementing an independent external whistleblowing and grievance reporting service through **Your Call**. **This 24/7 phone and online platform** enables anybody to **confidentially report concerns relating to unethical behaviour, misconduct, fraud, unsafe environments, or potential labour exploitation, including instances where individuals may feel uncomfortable using internal channels**. Reports are received and assessed by licensed and highly experienced disclosure officers trained in the sensitive handling of workplace issues, and **anonymity can be maintained throughout the process if requested**.

Your Call also acts as an intermediary between the reporter and the business when required, helping to **ensure concerns are thoroughly investigated and appropriately addressed**. The introduction of this platform reflects our commitment to **safeguarding workers’ rights, strengthening remediation pathways, and continuously improving transparency** across our entire supply chain.

Under our supplier code of conduct, which all vendors are expected to adhere to, suppliers are required to notify us in detail of any instances of modern slavery as well as the actions that have been taken to correct the breach and prevent any future occurrences. HSK Ward Group explicitly reserves the right to discontinue business relationships with any supplier that fails to comply with this requirement.

**yourcall**



MEASURING EFFECTIVENESS ● MEASURING EFFECTIVENESS ● MEASURING EFFECTIVENESS

# Measuring Effectiveness

Last year's proposed KPIs have been reviewed and realigned to improve data accuracy and ensure measurable outcomes.

With updated vendor onboarding processes and an upgraded Sedex membership, the following KPIs will guide data collection for future reporting:

## KPI 1: Supplier Onboarding

- New Vendor Incorporation: Number of new vendors completing the approval process.
- Vendor Approval Rate: Number of new vendors approved.

## KPI 2: Supplier Coverage

- Priority Vendor Incorporation: Percentage of our top 80% of vendors by spend linked to Sedex.
- Total Vendor Incorporation: Percentage of all vendors linked to Sedex.

## KPI 3: Self-Assessment, Auditing & Corrective Actions

- Questionnaire Completion: Percentage of vendors maintaining current SAQ and ESAQ data.
- Audit Frequency: Number of supplier audits conducted annually.
- Non-Compliance Findings: Number and severity of audit findings.
- Corrective Action Plans: Number of CAPRs issued and average implementation time.

## KPI 4: Reporting & Remediation

- Incident Reporting: Number of suspected modern slavery incidents reported per period.
- Reporting Timeliness: Average time between detection and submission.
- Resolution Rate: Percentage and timeframe of issues resolved.
- Incident Reduction: Decrease in reported cases over time.
- Victim Recovery: Percentage of affected workers supported into stable living conditions.

## KPI 5: Awareness & Education

- Training Completion: Number of employees completing modern slavery training programs.
- Supplier Engagement: Number of suppliers engaged to improve awareness and practices within the supply chain.
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PROCESS • CONSULTATION PROCESS • CONSULTATION PROCESS





## Consultation process

In preparing this Statement, the Sustainability Manager for HSK Ward Group engaged in comprehensive consultations with key members from each business unit, the executive leadership team, the CEO, and the board. This process included:

1. collaborating across the business to outline the reporting requirements of the Modern Slavery Act 2018 (Cth) and Ethical Trading Initiative framework,
2. sharing information about the proactive measures being implemented to meet these requirements, including key updates, and
3. soliciting feedback from the business units and board regarding issues related to modern slavery.

This report reflects the collective insights and outputs from these efforts, ensuring compliance with the both the Australian Modern Slavery Act 2018 (Cth) and Ethical Trading Initiative modern slavery statement framework.



# McKENZIE'S "Excelsior" BAKING POWDER



Wholesome, Pure, Reliable.  
JAS. F. McKENZIE & Co. *Melbourne.*

VARLEY BROTHERS  
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FUTURE COMMITMENTS • FUTURE COMMITMENTS • FUTURE COMMITMENTS

# Future Commitments

Future commitments will continue to involve the development of more robust partnerships with stakeholders to foster collaboration and knowledge sharing, as well as the development of training programmes for employees and suppliers to raise awareness and equip them with the tools to identify and respond to modern slavery risks effectively.

Additionally, the organisation aims to integrate data analytics into its monitoring processes, allowing for more precise tracking of actions, incidents, and outcomes.



By applying the organisation's current ethos of continuous improvement and being audit ready to the framework, the organisation seeks to ensure its practices remain aligned with evolving best practices and regulatory requirements, and that it maintains the highest ethical standards in its operations.

# hsk ward group

**This statement was approved by the board of HSK Ward Pty Ltd in their capacity as principal governing body of HSK Ward Pty Ltd.**

*Rob Dalton*

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Rob Dalton | Director