

McCain Foods (Aust) Pty Ltd

Modern Slavery Statement FY25.



Sustainability, Human Rights,
and Dignity in our Supply Chain



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Foreword.

As a leading producer of potato, prepared meals, and appetizer products, and as a family-owned company, McCain Foods Limited ("McCain", "it" or "its") holds its commitment to respecting human rights in conducting its global business. Addressing modern slavery and the exploitation of human rights across the global supply chain is an important priority, particularly because the bulk of ingredients come from farmers and suppliers of agricultural products.

McCain is proud to be a family-owned and values-driven company. McCain's shared values - Family, Authentic, Quality and Trusted - are important to the direction of decisions made regarding supply chain and procurement around the world.

"McCain holds its commitment to protecting human rights in its business at the core of its operations"

McCain continues to sharpen its focus on respecting the human rights of workers and the integrity of its supply chain following the introduction of the Modern Slavery Act 2018 (Cth) in Australia and similar legislation elsewhere. McCain sees this as an opportunity to continue to develop its framework of guiding principles to ensure that its business practices help to address the risk of modern slavery within McCain's own operations and supply chain.

In addition to looking at the global policies and programs currently in place at McCain, this report outlines the status of initiatives in development of McCain Foods Aust (Pty) Ltd (ACN 000 629 587), an entity registered in Australia ("McCain Foods ANZ", "us", "we" or "our"), to address the risks of modern slavery within our own operations and supply chain.



McCain Foods (Aust) Pty Ltd Modern Slavery Statement.

This statement is published in accordance with the Modern Slavery Act 2018 (Cth). It sets out the actions taken by McCain and McCain Foods Aust (Pty) Ltd, to address modern slavery risks in our own operations and supply chain over the financial year ending 30 June 2025 ("FY25").



Structure, Operations and Supply Chain.

McCain operates a global business. The head office of McCain, the Canadian parent company of McCain Foods ANZ, is located in Toronto, Canada.

McCain is a privately owned, multi-national leader in the frozen food industry, manufacturing quality products including French fries, appetizers, pizzas, vegetables, desserts, and prepared foods. McCain also owns companies in complementary industries, such as agriculture and transportation.

In Australia, McCain Foods ANZ is a significant player in the frozen foods category, manufacturing and selling frozen foods ranging from vegetables, vegetable-based products (such as French fries and sweet potato fries), complete meals, pizzas and snack food through quick service restaurants, foodservice businesses, and retail supermarkets. We sell our products throughout Australia and New Zealand and beyond into Asia and the Middle East.

McCain ANZ Manufacturing Facilities



In FY25, our portfolio of controlled entities included McCain Finance (Aust) Pty. Ltd. (ACN 067 367 882), Weyville Holdings Limited (NZ co. no. CH 459976), McCain Foods (NZ) Limited (NZ co. no. CH 358737), Grower Foods Limited (NZ co. no. CH 838659), and McCain Foods Taiwan Ltd., and all the entities together in the McCain Foods ANZ group are referred to as “our Group” for the purposes of this statement.

In FY25, our Group directly employed approximately **1,200 people** across Australia and New Zealand, and engaged thousands more indirectly through our logistics and supply chain. We are a trusted supplier to hundreds of hospitality establishments – restaurants, pubs, and clubs – as well as hospitals, aged care facilities, tourism operations, and many more foodservice businesses.

We are proud of our place in the Australian and New Zealand markets, and particularly of the relationships we have cultivated with local farmers. McCain Foods ANZ sources the overwhelming majority of our produce locally and we are committed to working with our farmers to support their day-to-day practices, as well as investigating ways to support new and innovative farming methods, including regenerative agriculture.

“We are proud of our place in the Australian and New Zealand markets, and particularly of the relationships we have cultivated with local farmers.”

The supply chain¹ of products and services that contribute to our operations includes raw agricultural materials – the top category being potato – and other commodities, including frying oils and dairy.

In FY25, our Group’s largest category of spend was on agricultural products and specifically potatoes - procuring from **239 growers: 129 potato growers** and **110 vegetable growers** (pea, green beans, sweetcorn and carrot) - from Australia and New Zealand, while other ingredients, raw materials, packaging and finished goods were sourced from more than **90 suppliers** in **18 countries**.

Our key suppliers in the indirect supply chain are rail and road freight service providers, cold storage providers and pallet suppliers.

ANZ Agricultural Procurement



129
Potato growers
(Our largest category of spend)



90
Suppliers
Of ingredients, raw materials, packaging and finished goods.



110
Vegetable growers
Pea, green beans, sweetcorn and carrot



18
Countries



PLOW • PLANT • HARVEST • WASH • PEEL • CUT • COOK • FREEZE • PACK • DISTRIBUTE • ENJOY!

¹ McCain differentiates procurement based on direct and indirect goods and services. Direct procurement involves the purchasing of goods, materials, and services directly associated with the production of products (e.g. raw potatoes, ingredients, spices, packaging), whereas indirect procurement refers to expenses incurred for materials, services, and maintenance required to operate the business (e.g. manufacturing equipment, maintenance costs, and consultancy costs).

Risks of Modern Slavery Practices in our Operations and Supply Chain.

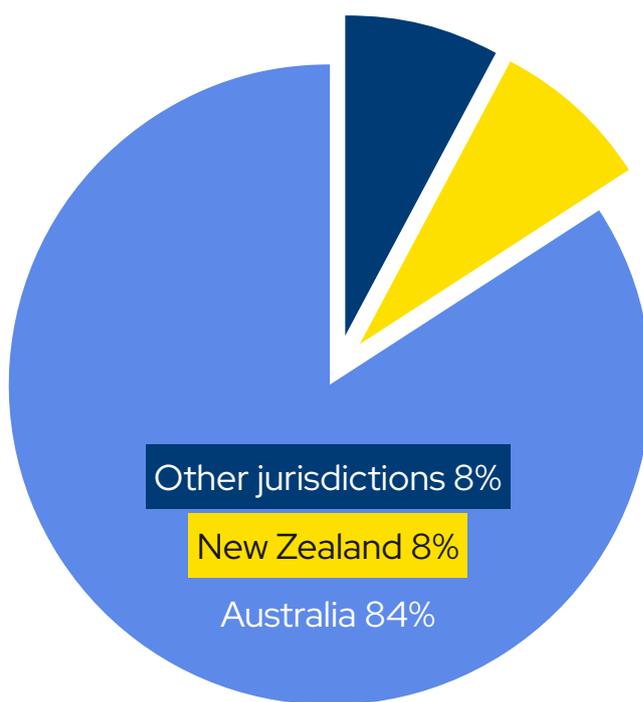
As a family-owned business, McCain has always operated according to its core values. McCain understands that there is an inherent risk of exposure to the threat of modern slavery and labour exploitation in food and agriculture operations and supply chains, from production and processing to packaging and transportation. The diversity and scale of McCain's supply network means that these risks are relevant to McCain companies around the world, and McCain understands that it has an important responsibility to be focused on respecting human rights and addressing risks of modern slavery in the industry. That is why McCain has invested significant resources into developing a robust McCain Code of Conduct, Supplier Code of Conduct and Global Human Rights Policy to govern its own actions and those of its suppliers, drawing upon international standards and best practices in human rights and sustainability.

The Supplier Code of Conduct – as well as the McCain Code of Conduct and Global Human Rights Policy – sets stringent standards of ethical conduct for McCain's suppliers, and is founded upon McCain's values, as well as applicable laws around the world.

In FY25, we identified that the overwhelming majority of our direct supply chain spend in ANZ was sourced from suppliers operating in countries that have a very low risk score based on the Global Slavery Index².

However, we acknowledge that the agricultural sector in particular poses a higher risk of modern slavery, requiring us to be vigilant with assessing and addressing risks.

Percentage of direct supplier spend based on country of origin



² <https://www.globalslaveryindex.org/>

Key Areas of Focus.



McCain Code of Conduct



Global Human Rights Policy



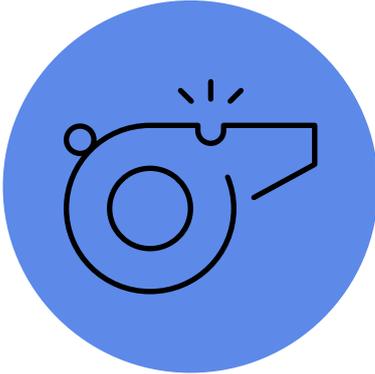
Annual employee certification of McCain Code of Conduct



McCain Supplier Code of Conduct



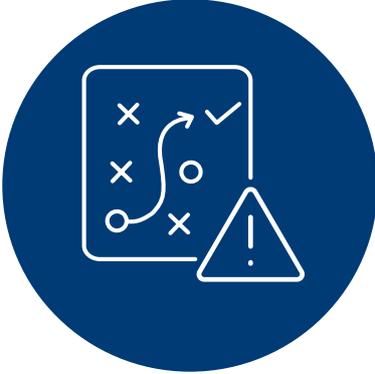
Supplier Expectations Letters



Whistleblower Policy



Audits



Risk Mapping and Due Diligence

Actions We Take to Assess and Address Risks.

1. McCain Policies

McCain Foods ANZ believes that strong internal policies and systems are a key aspect of managing and mitigating the risk of modern slavery in its operations and supply chain. McCain expects the same level of diligence in regard to respect for human rights from its suppliers as from its employees. McCain is committed to respecting human rights in its business and supply chains and has zero tolerance for human rights abuses.

Prior to the enactment of the Modern Slavery Act 2018 (Cth), McCain has had a longstanding set of policies in place that are regularly reviewed, to assess and address applicable risks. These include McCain's [Code of Conduct](#), [Global Human Rights Policy](#), Anti-Corruption Policy, [Supplier Code of Conduct](#) and our Whistleblower Policy (Policies).

These Policies and other programs - such as McCain's global sustainability strategy and commitments - ensure that team members and suppliers are dedicated to managing social, ethical, and environmental issues consistent with McCain's global values.

McCain values learning and transparency. All employees and suppliers are made aware of the expectation that they will familiarise themselves with – and comply with – applicable policies. In addition, all employees are required to undertake an annual recertification of the Code of Conduct as part of their employment.

The McCain Code of Conduct was refreshed in FY24 and states:

"We are committed to respecting human rights and mitigating any negative impacts. We require our business partners to share in this commitment. We do not tolerate modern slavery or human rights abuses, such as forced or child labour, or human trafficking, in our own workforce or by our business partners. By operating according to our values, we safeguard human rights in everything we do."

McCain's Supplier Code of Conduct is also clear and definitive regarding modern slavery:

"Use of forced or compulsory labour by the Supplier is strictly prohibited. This includes work or services not voluntarily performed that is exacted or coerced from a person under threat, force or penalty, or threatened abuse of law or legal process, including any kind of involuntary or compulsory, indentured or bonded labour, slavery, servitude or other slavery-like circumstances."

In addition, McCain's Global Human Rights Policy states:

"We uphold fair labour practices in employment and ensure our recruitment processes are transparent. We strictly prohibit any form of forced labour, bonded labour, indentured labour, involuntary prison labour, child labour and human trafficking in any form."

These Policies are regularly monitored and updated to ensure McCain approaches all social, ethical, and environmental responsibilities in an appropriate and agile manner.

Actions We Take to Assess and Address Risks.

2. Risk Mapping and Due Diligence

McCain conducts due diligence on all of our suppliers before they are introduced to the supply team. Our initial risk mapping exercise undertaken in FY20 identified freight and logistics suppliers as a higher risk category that would benefit from increased guidance on McCain's expectations regarding the elimination of modern slavery. In FY25, we continued to work closely with our freight and logistics providers to maintain open and daily communications.

Globally, in FY24 McCain began the pilot of a third-party risk assessment tool, Sedex, which supports McCain in understanding the overall inherent risk in the supply chain, based on procurement category and country, as well as supplier-specific risks. The pilot took place in the Continental Europe region, but is intended to be expanded globally. The Sedex Members Ethical Trade Audit ("SMETA") is a widely used ethical audit format and covers four pillars including labour standards, health and safety, environment, and business ethics.

Using Sedex allows McCain to increase the level of due diligence performed on potential vendors and suppliers, increasing oversight of its supply chain and permitting McCain to better assess risk.

Our Supplier Expectations Letters incorporate a Social Accountability statement including Modern Slavery expectations and Chain of Responsibility expectations.

McCain Foods ANZ remains committed to improving our actions to assess and address the risks of modern slavery, based on gaps identified to date, including:

- Updating all of our New Supplier Evaluation Surveys and incorporating an assessment of certain aspects of modern slavery for all suppliers
- Documentation updates to ensure modern slavery risk mitigation components are incorporated, as appropriate, and gaps are addressed
- Exploring further ways to capture supplier business practice information, including by engaging with third party organisations who provide risk management services to support our existing supplier due diligence processes.



Actions We Take to Assess and Address Risks.

3. Employee Training and Compliance

McCain Foods ANZ has dedicated an entire section of the company intranet site to its focus on sustainability actions, including the thriving rural communities in which McCain operates and the long-term, trusted connections to farmers.

Globally, McCain produces a sustainability report each year, serving as one forum available for employees to learn about its approach and progress relating to respecting human rights and addressing key risks. In FY25, McCain released its FY24 sustainability report which reiterates McCain's expectation that the highest ethical standards are upheld throughout its operations and supply chain and further describes its actions and initiatives to support this expectation, including its zero-tolerance approach to corruption or human rights abuses.

McCain engages in best practice in recruiting and hiring to ensure that all employees are appropriately on-boarded and employed in accordance with applicable laws. McCain has consistently taken significant actions to ensure the health and safety of employees and applicable third parties.

Our ANZ employee on-boarding experience includes training on modern slavery to improve employee awareness of the topic and how it relates to our business.



Actions We Take to Assess and Address Risks.



4. Managing Supplier Contracts

McCain maintains standard procurement terms and conditions for transactional matters and negotiated master service agreements for ongoing relationships.

If a supplier is found to be in breach of the terms stipulated in their contract with us, including those relating to compliance with the McCain Supplier Code of Conduct, we are able to take corrective action and suspend or terminate the contract with that supplier.

We take any breach of the McCain Supplier Code of Conduct - or any other breach involving a risk to human rights - seriously, addressing it promptly and with the ultimate goal of reducing or removing the risk altogether (for example, potentially removing a supplier from our supply chain).

5. Reporting Concerns

Pursuant to McCain's Code of Conduct and Supplier Code of Conduct, the Group's employees and suppliers have a duty to report any identified or suspected occurrences of modern slavery or human rights violations. Employees may make a report to their manager or local or Global Human Resources representative or the Global Legal and Compliance team.

For employees or third-party stakeholders who wish to make an anonymous complaint to an external service, McCain retains an independent external service provider which is authorized to receive whistleblowing reports in relation to its global business (contact details are available in the Code of Conduct and Supplier Code of Conduct). Anonymous complaints can be made through email, online or a third-party call centre and all reports received by the external service provider are reported to McCain's Global Legal & Compliance team, and are investigated as required. As at the date of this statement, no reports or complaints have been received through this service in respect of actual or suspected modern slavery occurrences in ANZ.

Further Actions We Will Take to Assess and Address Modern Slavery Risks.

McCain Foods ANZ remains committed to addressing modern slavery risks and to continuously engaging in risk assessment of our own operations and supply chain to identify any new or developing areas of risk in the business and to mitigate these risks.

1. Assessment of Suppliers

We will continue investigations and review of the modern slavery risks in our direct and indirect supply chains and determine appropriate remediation action.

As noted above, if a supplier is found to be in breach of the terms stipulated in their contract with us, including those relating to compliance with the McCain Supplier Code of Conduct, we are able to take corrective action and suspend or terminate the contract with that supplier.

We will also investigate establishing specific auditable recordkeeping requirements for suppliers in respect of workplaces, high occupancy worker residences, payroll, and other, as applicable.

2. Training

McCain Foods ANZ continues to consider the appropriateness of additional, tailored training to relevant stakeholders within the business. This subsequent training may focus on function-specific skills, including how to identify the existence of modern slavery

in a supply chain and how to uphold the high standard of requirements that McCain Foods ANZ has adopted for all our suppliers to help us proactively manage modern slavery risks. Where appropriate and feasible, McCain Foods ANZ may also offer training modules to suppliers.

3. Audits

McCain Foods ANZ monitors compliance with the Policies and will formally and informally monitor and evaluate progress regarding our approach to modern slavery as part of the regular monitoring process. Specific auditing of certain relationships, such as with our farmers, will become an increasing focus for us.

4. Deep-dive into Indirect Supply Chain

As our response to modern slavery risks develops and matures, McCain Foods ANZ will continue to develop processes and procedures that are most effective to assess the potential risk within our indirect supply chain. We will report progress via this statement as applicable.



How We Assess the Effectiveness of Actions We Take to Address Modern Slavery Risks.

McCain's belief that 'good ethics is good business' has guided it from farm to fork, and is the basis of its values. On this basis, McCain has built relationships with farmers spanning generations, is recognised for its commitment to sustainability and work in local communities, and has been able to successfully implement innovative regional initiatives around the world, including in Australia and New Zealand.

One key mechanism for assessing the effectiveness of McCain Foods ANZ's modern slavery risks is through stakeholder engagement. Engaging with stakeholders helps McCain to assess the risk of modern slavery in its own operations and supply chain, and understand the mechanisms being implemented or used to help mitigate the risk.

McCain Foods ANZ will continue to evaluate suppliers and their practices, using and regularly reviewing a scoring matrix to best assess the effectiveness of our due diligence.

The effectiveness of actions taken to address modern slavery risks may be measured by certain quantitative metrics as appropriate, which may include: the number of individuals trained, contracts signed with appropriate modern slavery provisions.



Consultation Process with our Subsidiaries.

The members of our Group are wholly-owned by McCain Foods Aust (Pty) Ltd and the same management team oversees all businesses within the Group. Accordingly, consultation with these entities has occurred as part of the process.

This statement was approved by the Board of McCain Foods (Aust) Pty Ltd.

Signed,

Lyn Radford

Managing Director, McCain Foods (Aust) Pty Ltd

Date: 23 December 2025

