

A top-down view of almonds and granola on a white marble surface. A metal scoop is pouring granola, and a bowl of granola with fruit is visible on the right.

Joint Modern Slavery Statement

Financial Year Ending
30 June **2022**

The Kinrise logo, featuring a stylized human figure with arms raised, composed of a yellow semi-circle and dark blue curved lines.

Kinrise.

This joint modern slavery statement is submitted by Kinrise Pty Ltd ACN 143 389 404 of Level 16, 644 Chapel Street, South Yarra, VIC 3141 on behalf of itself, Kin Group Pty Ltd, Green's General Foods Pty Ltd and Green's Foods Holdings Pty Ltd.



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A message from our CEO



At Kinrise, we are driven by our purpose.

Our purpose is to proudly bring families together with delicious homegrown food we have made with care. We also believe that how we achieve our results is as important as the results we achieve so we are committed to championing and living our five core values.

As Kinrise continues to grow so does our responsibility to each other, our communities and our consumers. We are committed to deeply respecting human rights and implementing responsible workplace policies & practices. We will continue to work with our suppliers to foster a shared pride in the way that we operate and are looking into a future with even more direct engagement with our suppliers including greater alignment in respect of expectations on ethical standards & direct collaboration to address risks.

Looking forward, we are committed to continually improving our operations and those of our partners by applying even greater focus on the identification, prevention and mitigation of modern slavery risks and while we have made good progress, we will always strive to do more by enhancing our governance frameworks and investing in and implementing best in class risk management practices as we continue to grow.

Esme Borgelt
CEO

Core Values



we are
driven



we are
real



we
care



we are
proud



we are
different



Introduction



Kinrise Pty Ltd (ACN 143 389 404) (Kinrise) is an Australian food company with a diverse portfolio of Australian food businesses united by shared values, shared leadership, and a shared view of the future of food in Australia.

This is the third Modern Slavery Statement submitted by Kinrise pursuant to the Modern Slavery Act 2018 (Cth) (Act). It sets out the approach and actions taken by the following related entities of Kinrise (all of which are reporting entities for the purposes of the Act) to identify, assess and address modern slavery risks in the Group's operations and supply chain over the financial year ending 30 June 2022 (Statement):

- (i) Kin Group Pty Ltd (ACN 095 313 714) (ultimate holding company) (Kin Group);
- (ii) Kinrise Pty Ltd (ACN 143 389 404) (Kinrise);
- (iii) Greens General Foods Pty Ltd (ACN 001 553 564); and
- (iv) Green's Food Holdings Pty Ltd (ACN 160 202 200).

Unless expressly stated otherwise, each of the reporting entities listed above and their controlled entities as defined in the Act and listed on page 4, are referred to in this Statement as "the Group" or "our Group".

The Groups registered office is located at Level 16, 644 Chapel Street, South Yarra, Victoria 3141.





Our structure, operations and supply chains

Kin Group and its controlled entities comprise an Australian privately owned investment business that own and operate large industrial, manufacturing, technology, and retail businesses worldwide.

Kin Group is the ultimate holding company of Kinrise. Kinrise is the parent company of the following broad portfolio of related entities:

- (i) Greens General Foods Pty Ltd (ACN 001 553 564);
- (ii) Green's Food Holdings Pty Ltd (ACN 160 202 200);
- (iii) Green's Intellectual Holdings Pty Ltd (ACN 165 758 298);
- (iv) Waterwheel Premium Foods Pty Ltd (ACN 162 115 611);
- (v) Green's Biscuits Pty Ltd (ACN 167 337 439);
- (vi) Ozpack Holdings Pty Ltd (ACN 115 009 151);
- (vii) Propax Pty Ltd (ACN 101 942 312);
- (viii) OLHS Pty Ltd (ACN 127 870 008); and
- (ix) Key Partnerships Australia Pty Ltd (ACN 109 800 937);
- (x) Burst Foods Pty Ltd (ACN 619 846 114);
- (xi) The Cake Syndicate Pty Ltd (ACN 150 924 726).



Kinrise (and its controlled entities') operations expand across the areas of developing, manufacturing, packaging, marketing, and sale of food products. Kinrise operations are based in Australia with manufacturing sites in NSW, Victoria and Queensland meaning that all our food products are manufactured only in Australia.

We operate across four different categories:



Snackfoods



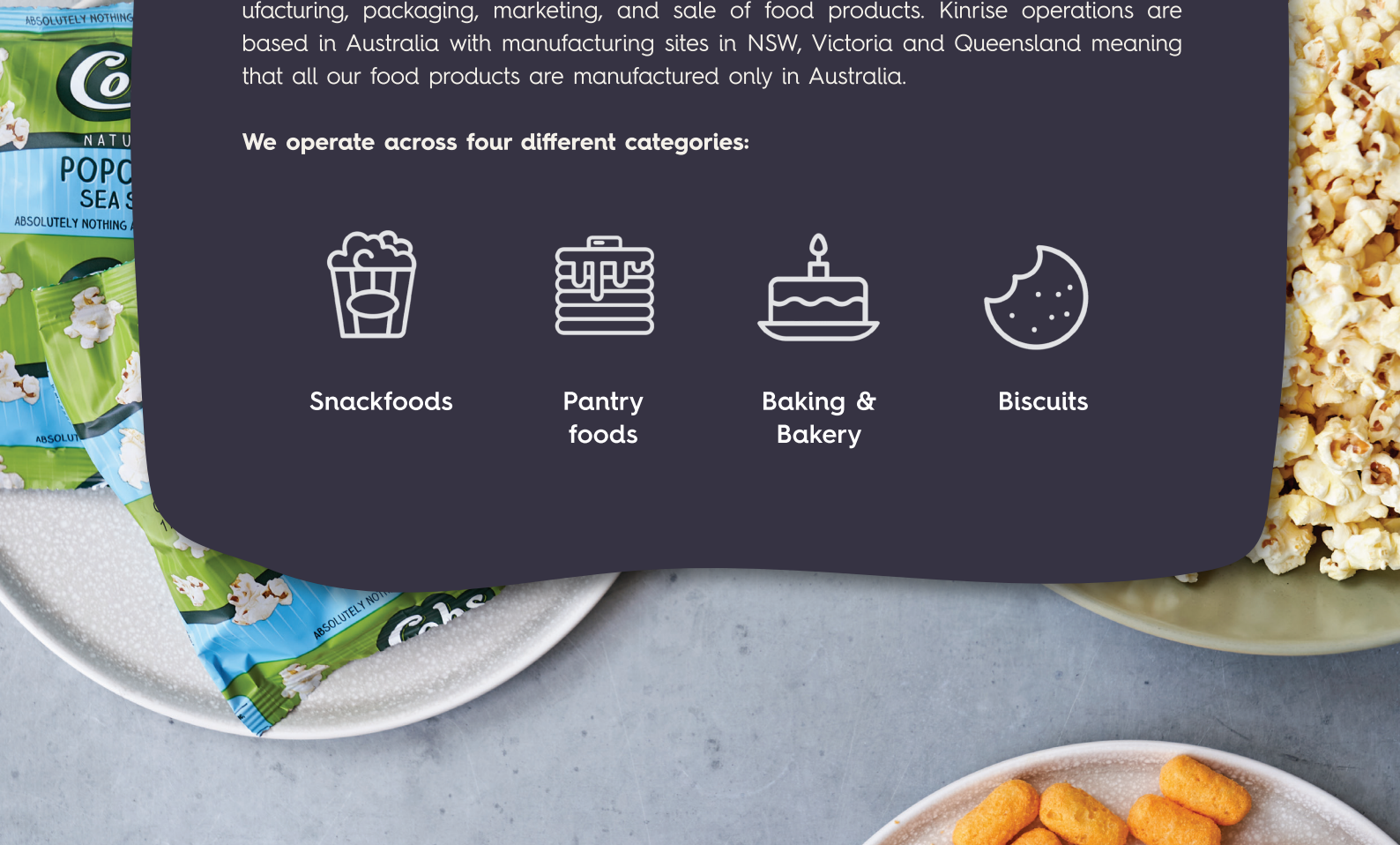
**Pantry
foods**



**Baking &
Bakery**



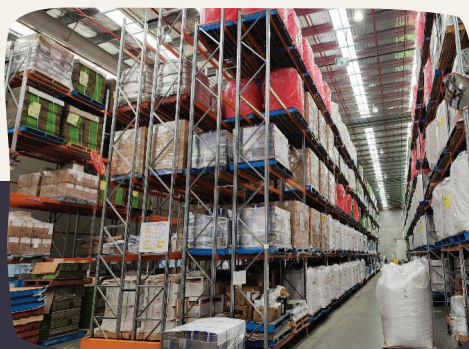
Biscuits





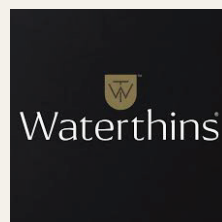
Kinrise employs 681 team members throughout the Group's operations and for the food we produce, over 90% of our Kinrise branded products are made with at least 70% Australian ingredients.

Our food products are manufactured in Australia for supply across Australia and for export supply to New Zealand, New Caledonia, Hong Kong, Singapore, Japan, Malaysia and Fiji.





Kinrise manufactures food under the following brands:



The supply chain of products and services that contribute to our Group operations include:

- (i) raw ingredients;
- (ii) packaging;
- (iii) warehousing, cold storage, freight, and distribution services;
- (iv) manufacturing equipment, and installation and commissioning services;
- (v) labour hire services;
- (vi) personal protective equipment;
- (vii) professional, legal, financial, marketing services; and
- (viii) utility services.



In the 2022 financial year, our Group partnered directly with more than 965 suppliers. Of those 965 suppliers, only 28 were international suppliers (those 28 coming from 10 different countries with 8 being from US and NZ and the other 20 from Canada, Germany, Denmark, Netherlands, South Africa, Italy, Malaysia, Hong Kong and Great Britain). These 28 international suppliers represented only 3.4% of our total Group spend in relation to capital, packaging and raw materials. The 937 other suppliers were all based in Australia.



Potential risks of modern slavery practices in our business

We have identified several areas of potential risk in our operations and supply chain which we explore below.

Labour Hire

We have identified that an area of risk of modern slavery in the Group's operations is through labour hire service providers that we use that may engage foreign or temporary unskilled labour, and the labour practices of international suppliers that we may engage from time to time. We classify this risk as low to medium and have implemented processes to reduce such risks as outlined in page 10 of this Statement below.

Manufacturing equipment & packaging

The Group's largest category of spend with international suppliers during this reporting period was on manufacturing equipment and packaging, primarily sourced from the United States of America, Germany, and New Zealand. According to the Global Slavery Index 2018¹, these countries are not deemed high risk countries and we therefore believe the risk of modern slavery in connection with such supply arrangements to be relatively low.

Manufacturing processes

According to the Australia Red Cross Addressing Modern Slavery Guide for Australian Businesses², the manufacturing sector potentially contributes to the risk of modern slavery. The Group's operations include administrative, sales, marketing, and manufacturing functions. All of the Group's operations, including the manufacturing function is based in Australia which according to the Global Slavery Index 2018³ is inherently a low-risk jurisdiction. Further, the potential risk is reduced as our front line and operational roles across our sites are mostly employed under local enterprise agreements. Those agreements that have been renewed in the reporting period have been bargained in good faith and agreed terms of employment collectively and agreements are compliant with legislative requirements, with union or other bargaining person representation. These conditions are set out in relevant agreements including The Cake Syndicate Pty Ltd (trading as Susan Day Cakes) Enterprise Agreement 2021-2024 which was recently approved and commenced on 29 March 2022.

1, 3. <https://www.globalslaveryindex.org/>

2. Australia Red Cross Addressing Modern Slavery Guide for Australian Businesses Feb 2020





Potential risks of modern slavery practices in our business cont.

Purchase of higher risk raw materials

In the course of our Group operations, we do purchase raw materials including cocoa and sugarcane. According to the Global Slavery Index 2018⁵, cocoa and sugarcane, when imported into a G20 country, are products that are potentially at risk of modern slavery.

However, our Group does not import these raw materials and therefore the potential risk identified above does not arise. Our Group sources sugar which is grown and supplied directly from an Australia grower/manufacturer. Cocoa is also sourced from an Australian manufacturer of chocolate and confectionary.

In addition, during the reporting period, 17% of the total cocoa sourced by the Group was UTZ/Rainforest Alliance (RA) Certified cocoa. Products that obtain UTZ/RA certification comply with strict requirements, and UTZ certified farms and companies are audited by independent certification bodies. UTZ/RA certification requirements include good agricultural practices and farm management, safe and healthy working conditions, addressing child and forced labour, and protection of the environment.

During the reporting period we assessed and reviewed our strategy and decided to source UTZ/RA cocoa wherever possible. We put agreements in place with implementation occurring in the next reporting period. Implementation dates across the Business Units who source Cocoa are as per below:

- Greens Foods changed to 100% UTZ/RA sourced cocoa as of February 2022;
- Greens Biscuits will change to 100% UTZ/RA sourced cocoa as of October 2022;
- Susan Day will change 45% of total supply to UTZ/RA cocoa by December 2022.

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





The actions we take to assess and address these potential risks

Our approach to managing modern slavery risks is addressed in various ways. All new starters who are salaried employees are issued with online compliance training modules in respect of Workplace Behaviours generally, which sets some of the expectations from Kinrise for our employees in respect to ethical and illegal conduct more generally including how to manage incidents associated with ethical and illegal conduct.

The Group also has the following existing policies:

- Equality and Diversity Policy
- Whistleblower Policy
- Work Health and Safety Framework
- Grievance Handling Policy & Procedure

The Kinrise Whistleblower Policy states that any illegal and/or unethical conduct will be investigated and includes a hotline operated by an independent service provider that employees can contact at any time. Employees are encouraged to report any occurrences of conduct outside of applicable laws identified or suspected via this hotline. The Group has completed a review of this Policy to enhance the details relating to modern slavery occurrences, the details of which are to be included in our next report due to the date of implementation of those changes.



The Group's Diversity & EEO Policy states that all employees are entitled to be treated with dignity courtesy and respect, work free from discrimination, bullying and harassment, and have the right to raise issues or make an enquiry or complaint without being victimised. The Group has completed a review of this Policy expand its coverage more directly as it relates to human rights and how the Group will ensure that employees follow policies, procedures and systems implemented to prevent the occurrence, and mitigate the risk of, modern slavery. These changes will be detailed in our next report due to the date of implementation of those changes.

One of our core values is We Care and that means always striving to do better for our people and our communities.





The actions we take to assess and address these potential risks cont.

The Kinrise Work Health and Safety Framework sets out a structure for the management of Health, Safety and Environment with all of our businesses. It comprises of levels from high level elements through to more detailed procedures, processes, and protocols to provide employees with a framework to perform their role and responsibilities safely.

The Group's Grievance Handling Policy states that all team members have the right to:

(a) make a complaint to their direct team leader or another team leader at an appropriate level;

(b) be treated with respect and impartiality and provided with support throughout the process;

(c) have the principles of natural justice observed; and

(d) that it is the responsibility of all parties involved in a grievance to participate fully in the resolution process in good faith.

The Group has initiated a review of this Policy to enhance the details relating to modern slavery occurrences, details of which are to be included in our next report due to the date of implementation of those changes.



During the last reporting period the Kinrise master goods and services procurement agreement template was updated to include contractual controls that:

(a) allow Kinrise to request a written report addressing the supplier's measures to identify the risks of modern slavery practices;

(b) require the supplier to represent and warrant to Kinrise that the supplier, to the best of its knowledge and belief and as at the date of entering into the agreement with Kinrise or a member of the Group, does not, and will not, use any form of modern slavery in performing its obligations under the agreement;

(c) require the supplier to notify Kinrise if it becomes aware of any risks that modern slavery will be used by the supplier; and

(d) in certain circumstances, require the supplier to develop and implement a Modern Slavery policy and due diligence processes in its operations.

During this reporting period, Kinrise completed its negotiations to update its terms of supply with labour hire service providers across all our manufacturing sites in NSW, Victoria and Queensland. As part of this process the Kinrise labour hire service procurement agreement was updated to include provisions that require the labour hire service provider to ensure that any personnel employed by them to perform services on their behalf to the Group are properly characterised. These provisions also ensured that such personnel are engaged and provided with clear terms of employment that comply with all applicable laws and are paid and provided all employment entitlements and rights in accordance with the applicable laws. The terms of the updated agreement has now been agreed by labour hire service providers in Victoria during this reporting period but will be executed for Victorian sites outside of this reporting period in November 2022. For providers of NSW & QLD sites the agreement has been updated in this reporting period and included in a tender process document for NSW and QLD that is expected to conclude in or around H1 2023.



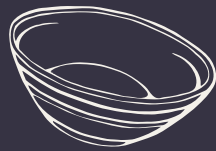
The actions we take to assess and address these potential risks cont.

In addition to the above measures, when sourcing the supply of products and services that contribute to our Group's operations, the Group continues to aim to take into consideration whether the product or item can be sourced domestically in order to reduce the risk of modern slavery in the Group's supply chain. During this reporting period, we were able to make conscious choices to source certain ingredients domestically including sourcing of ingredients such as corn and oil which were historically produced offshore but which are now sourced from local suppliers/growers.

We acknowledge that in our last report we committed to developing a Supplier Code of Conduct and standards that will apply across all suppliers in the Group's supply chain. We also committed to developing and implementing a supplier questionnaire, to be used when onboarding new suppliers, that will incorporate questions driven to determine the risk of modern slavery in the suppliers' business, operations and supply chains.

We are pleased to report that the Supplier Code of Conduct was finalised however implementation and communication and engagement with our full existing supplier base in respect of this Code was not completed during this reporting period and so full details of its content and roll out will be included in our next report. We made a deliberate decision to defer the development and roll out of our new Supplier Code of Conduct externally and the development of a Supplier Questionnaire to focus our efforts on a restructure of our procurement function.

In March 2022 we centralised our procurement function to more tightly manage how we onboard, get to know and manage our supplier base with more of a dedicated and proactive oversight. We are growing our procurement team to continue to deliver improvement in this area and we feel confident that this decision about our procurement group structure and resourcing will set us up for success to deliver on these outstanding initiatives and those planned for our future and outlined on page 14 of this report.



We source from local growers & suppliers where possible.





Measuring the effectiveness of our actions

During this reporting year the Group continued to rely on the existing:

(i) Kinrise risk management framework and processes to assist the Group in the identification, assessment, mitigation, and monitoring of risks, including risks involving modern slavery; and

(ii) a Kinrise risk register to record any risks and an assessment of the effectiveness of the controls to address such risks.

In this reporting period the Audit Risk and Compliance Committee, comprising representatives of Kinrise and Kin Group continued to monitor and measure the effectiveness of the controls and actions taken to address risks, including risks involving modern slavery. The Audit Risk and Compliance Committee meets quarterly.

During this reporting period, the Group's manufacturing facilities participated in SEDEX members Ethical Trade Audit (SMETA) audits. A SMETA audit is a social audit used by businesses to assess and understand if they are meeting responsible business practices and social compliance, such as, the working conditions at the business, health and safety of workers, human rights including labour force and child labour. Once an audit is complete, the business can then work to address any issues raised, based on a Corrective Action Plan.

During this reporting period, we are pleased to report that no significant modern slavery risks were identified. There were recommendations made about ensuring we have systems in place to ensure entitlement to work checks are always completed for all workers which we will ensure is actioned. There was also a finding on one of our manufacturing sites that there was a need for a more focused effort in relation to human rights impacts on our stakeholders including communication of the company's position on human rights to suppliers which we will remedy with the launch of our Supplier Code of Conduct to be reported on in the next reporting period.





Process of consultation with our subsidiaries

In the course of preparing this Statement Kinrise has consulted with each member of the Group specified on page 3, the Legal team, and the Kinrise Procurement team that has day-to-day accountability for sourcing the products and services in its supply chain that contribute to the Group's operations.



Our Purpose at Kinrise is to proudly bring families together with delicious homegrown food we've made with care.



Future Focus

FY 2022 was a year of continued focus on Kinrise's future growth. With this ongoing maturity as a business and in the spirit of continuous improvement enshrined in the Act, we have made bold and important moves to enhance the measures we employ to identify, assess, and ultimately remediate any potential or real modern slavery risks that exist in our business. We will report on these developments in a more fulsome way in our next report, however, our focus will be on the following:

- Formation and execution of a new more tightly focused approach to governance including a dedicated Modern Slavery Committee with members across all relevant areas of our business including HR, Legal, Finance, Procurement and Safety & Quality;
- The creation and execution of a three-year road map for the new Modern Slavery Committee that prioritises a broad range of activities for us to deliver on our commitment as a company to manage the risks of modern slavery in our supply chain and operations;
- We will share in our next report the new Supplier Code of Conduct for Kinrise and details of its roll out to our supplier base including plans to build greater clarity of our expectations via our contractual agreements with suppliers; and
- We will also share progress in our next report on the implementation of our use of a third party, world class, software platform Ethixbase making use of its modern slavery risk assessment module and supplier questionnaire which was developed by experts in this field Norton Rose Fulbright. We look forward to reporting on how our use of this technology has allowed us to better understand our supplier base, apply data based risk ratings to each and build meaningful action plans based on that output. We are confident that this will enable clear and annually comparable risk reporting ongoing for Kinrise.

This statement has been approved by the Board of Kin on behalf of the Group.

Raphael Geminder
Director of Kin

