



Joint Modern Slavery Statement



Kraft Heinz Australia Pty Limited
H.J. Heinz Company Australia Limited
Golden Circle Limited
Cerebos (Australia) Limited
Salpak Pty Limited

A Message from ANJ President Simon Laroche



At Kraft Heinz, our Vision is to *Sustainably Grow by Delighting Our Consumers Globally!* 'Sustainable Growth' is our commitment to excellence in environmental and social governance, including continuous improvement and responsible corporate practices throughout our operations and the supply chain.

Kraft Heinz Australia Pty Limited's Board of Directors and the Executive Leadership Team believe that protection of human rights is fundamental to any good business and we, as a company and each individually, have both the ability and responsibility to drive positive change through our work in the APAC Region and globally.

Kraft Heinz's engagement and commitment to the promotion and protection of human rights, tolerance, respect for different viewpoints, sense of inclusiveness and shared ownership are the values that underpin our business and our relationships with customers and suppliers. We are on the continuous journey improvement and developing our human rights strategy.

It is my privilege to present this inaugural Joint Modern Slavery Statement on behalf of Kraft Heinz Australia Pty Limited, H.J. Heinz Company Australia Limited, Golden Circle Limited, Cerebos (Australia) Limited and Salpak Pty Limited.



Reporting Entity and Structure

Kraft Heinz Australia Pty Limited ACN 622 234 379 is the Australian subsidiary of the Kraft Heinz Food Company (**the Kraft Heinz Food Company**) and a parent company of H.J. Heinz Company Australia Limited, Golden Circle Limited and Cerebos (Australia) Limited

This joint Modern Slavery Statement (**Modern Slavery Statement**) has been prepared by Kraft Heinz Australia Pty Limited in accordance with the *Modern Slavery Act 2018 (Cth)* (**the Modern Slavery Act**) covering itself and the following subsidiaries which are also reporting entities under the Modern Slavery Act:

- H.J. Heinz Company Australia Limited ACN 004 200 319
- Golden Circle Limited ACN 054 355 618
- Cerebos (Australia) Limited ACN 004 304 803
- Salpak Pty Ltd ACN 004 536 636

(each, a **Reporting Entity** and together **Kraft Heinz Australia**).

The Process of Consultation

This statement covers each Reporting Entity, following a consultation process with the Kraft Heinz Australia Human Rights and Sustainability Steering Committee and the executive leadership team of each Reporting Entity. As noted further below, the Human Rights and Sustainability Steering Committee includes representatives from legal, human resources, procurement, scientific and regulatory affairs, nutrition, product development and packaging functions and is co-chaired by Kraft Heinz Australia General Counsel and the Head of Government and External Affairs. The Committee reports directly to the Kraft Heinz Australia Board of Directors.

The Modern Slavery Statement describes the risk of modern slavery in our own operations and our supply chain for the period from 1 January 2020 to 31 December 2020 (**the Reporting Period**), actions taken by Kraft Heinz Australia to assess and address the risks and how we evaluate effectiveness of these measures. The term ‘modern slavery’ as used in this Statement refer to the definition in the Modern Slavery Act.

Introduction to Kraft Heinz Australia

Kraft Heinz Australia is a large food and beverage manufacturing company group, with a mission *To Make Life Delicious* and to produce high-quality, great-tasting food.



We produce and market a wide range of foods suitable for different ages including ketchup and sauces, baby foods, baked beans, soups, cooking sauces, fruits, vegetables, fruit drinks and juices. We take our role as a leading food manufacturer very seriously, with a commitment to introducing healthier food choices and improving the nutrition of our current products where necessary.

We are committed to *Doing the Right Thing* by enhancing the quality of people's lives through sustainability, health and wellness, and social responsibility.

In 2020, the Kraft Heinz Food Company released the Kraft Heinz Global Environmental Social Governance Report on growing sustainably, including our healthy living and community support commitments, which can be found [here](#).



Our Brands

We manufacture, distribute, market and sell a wide range of food and beverage products under the portfolio of well-loved and known brands, some of which have been household favourites for generations.



Supporting communities in need

The Kraft Heinz Foundation is dedicated to alleviating world hunger. The Foundation pursues that mission through strategic partnerships with organizations that have programs aligned with hunger relief, nutrition support and self-sustaining food sources.

Kraft Heinz employees from all corners of the world have passionately joined the Foundation through volunteer efforts towards our goals, highlighting the critical nature and immediacy of our work in alleviating world hunger.

THE KRAFT HEINZ FOUNDATION'S GOALS REST ON THREE PILLARS:



Ending World Hunger

Ending world hunger through food security and food self-sufficiency



Culture of Volunteerism

A culture of volunteerism instilled in employees globally through meal packaging events and vision trips



Building Communities

Building communities acting in positive and responsible ways where we live and work



We are proud of the progress we have made on our original goal to deliver 1.5 billion nutritious meals to those in need by 2025.

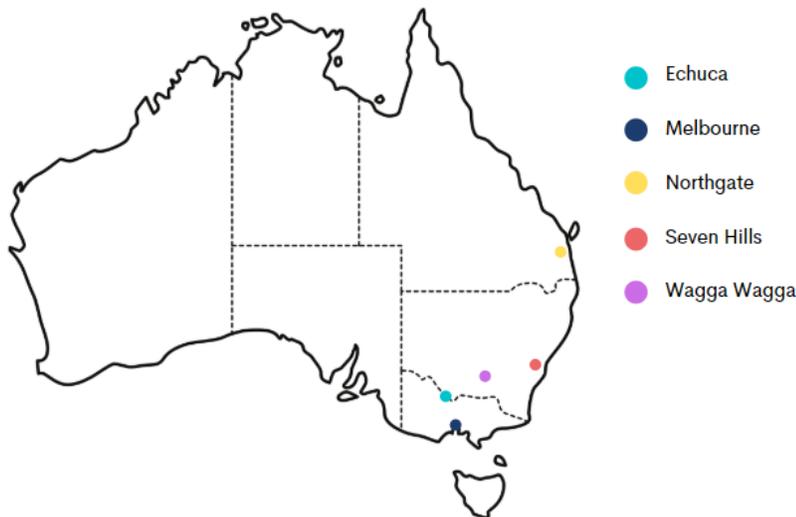
Here in Australia, we partner closely with our community programs such as Foodbank Australia, where we support by both food donations and employee volunteering. In 2020, we donated almost 3 million meals to our communities. We are committed to continuing to support through these channels, by donating on both a national scale and a local scale.

Kraft Heinz Australia Operations and Supply Chain

At the end of 2020, Kraft Heinz Australia had 4 company-owned factories in Australia and employed just under 500 people across our Australian offices and factories.

The following map shows the locations where our factories and offices are based around Australia:

Factories and offices based around Australia



Our supply chain focuses on the sourcing and warehousing of ingredients and packaging required for the manufacturing of our delicious food and beverage products and procuring other indirect goods and services that are necessary for the manufacturing process.

We also work with external companies (co-packers) to manufacture products for Kraft Heinz Australia under our own brands. At the end of 2020, Kraft Heinz Australia had approximately 72 packaging suppliers, 262 ingredient suppliers, 2500 indirect goods and services suppliers and 60 external manufacturers (co-packers).

Our aim is to engage with our suppliers in a long term and stable relationship, therefore we seek to do business with suppliers that share similar ethics and sustainability practices to us. Our sourcing evaluation processes include undertaking due-diligence and evaluating whether proposed suppliers are aligned with our business values, quality and commercial outcomes.

The following map shows the locations where our suppliers and co-packers are based



Risk of Modern Slavery Practices in Our Operations

Kraft Heinz Australia adopts a risk-based approach to modern slavery due diligence and has primarily focused on the human rights of our employees and contractors, along with the human rights of those employed by our suppliers and co-packers.

As of this Reporting Period, Kraft Heinz Australia has identified the risk of modern slavery in our own operations as low. This assessment is based on:

1. the significant level of resources dedicated to human resource management by Kraft Heinz Australia
2. high union membership and engagement
3. well established and legally compliant resources, systems and processes to administer team member payments. Kraft Heinz Australia workforce is covered by either:
 - (a) collective bargaining agreements, which confer minimum pay and entitlements and provide for consultation regarding significant operational changes; or

- (b) individual employment agreements that are compliant with and cover core employment conditions such as minimum wages, hours of work, and leave entitlements.

Risk of Modern Slavery Practices in Our Supply Chain

Kraft Heinz Australia's supply chain is complex, geographically diverse and is comprised of global multi-nationals to small local growers and businesses. Every day, Kraft Heinz Australia uses thousands of ingredients which are sourced from around the globe. We are aware that small number of those products and services are the type of commodities or, originate from geographies, with the reported high risk of modern slavery practices.

Supply chain human rights risk assessment

Towards the end of 2020, Kraft Heinz Australia engaged ELEVATE, an industry leader in sustainability and supply chain services globally, to undertake an independent human rights risk assessment of our supply chain, based on risk assessment and segmentation methodology. This approach considered inherent sourcing risks and business leverage insights to determine which segments of our supply chain provide the greatest opportunity to influence change, manage risk and drive impact.

This assessment is informing and influencing our plans to continuously develop and improve our due diligence and management programs for our suppliers and co-packers.

Methodology - Risk Assessment and Segmentation

Kraft Heinz Australia assessed its top 429 suppliers to the Australian business, across all four of our divisions: packaging, ingredient, indirect services and external manufacturers (co-packers).

The risk inputs involved evaluation of the relative risks of exploitation and human rights vulnerabilities involved in producing the products and delivering services within our supply chains.

Specific risk characteristics evaluated for each supplier included:

- **Workforce:** relating to the nature of the work, required skills
- **Product:** including seasonality, production processes, costs, and value
- **Business processes:** involving labour recruitment issues, transparency, and complexity.

Inherent geographic and commodity risks were determined through a blend of public domain datasets (e.g. United Nations, World Bank, Global Slavery Index, ILO) and ELEVATE's country risk scores based on annual audit data to reflect working conditions and human rights non-compliances on the ground.

Ingredient sourcing is critical to the Kraft Heinz Australia business, therefore ingredient specific risk assessment irrespective of leverage has been also conducted.

Ingredients and commodities that are core to our business and have been identified as an area of risk exposure, include tomatoes and other fresh produce, cereal and pulse products, oils and fats, seafood, and seasonings and preservatives

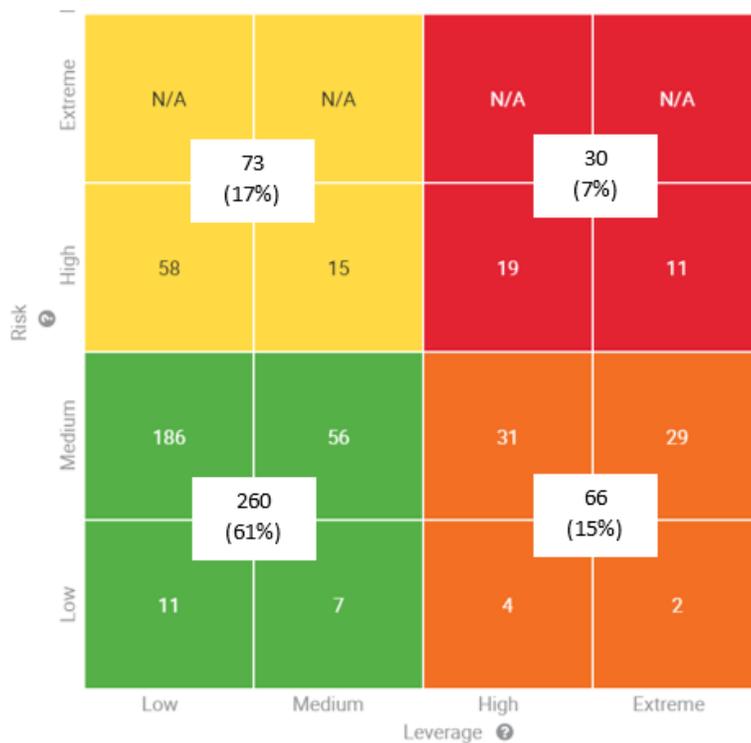
The leverage inputs evaluated Kraft Heinz Australia's spend, spend trends and length of the relationship with the supplier. Each supplier was then assigned a risk and leverage rating based on the

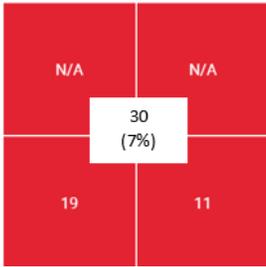
methodology described. These ratings determined the supplier 'category' or 'segment' for prioritised actions.

The risk scores were coupled with Kraft Heinz Australia's leverage data and each supplier was assigned a risk/leverage rating, which determined the supplier 'category' or 'segment' for prioritised actions.

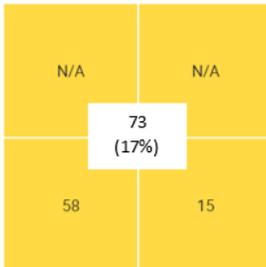
Risk Assessment Results

The outcome of the risk assessment is represented in the matrix below and demonstrates a segmented view of risks across our supply chain:

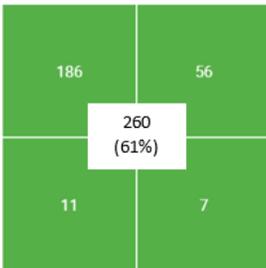




Priority Segment: 7% of our suppliers have been assessed as having the 'Highest Risk' of modern slavery exposure. This is because of their geographies and the nature of products or services we source from them. This is also the segment where Kraft Heinz Australia has a high degree of leverage with the suppliers.



Moderate Segment: 17% of Kraft Heinz Australia suppliers, the 'High or Extreme Risk' of modern slavery exposure due to their geographies and product or services categories, and where Kraft Heinz Australia has lower leverage and thus visibility of the supplier practices.



Minimum Segment: 61% the largest cohort of Kraft Heinz Australia suppliers, with 'Minimum Risk' of modern slavery practices due to their geographies and product categories, and where Kraft Heinz Australia has relatively low leverage.



Specialised Segment: 15% of Kraft Heinz Australia suppliers, which represent 'Lower Risk' of modern slavery practices due to their geographies and product categories, and where Kraft Heinz Australia has large value of transactions and higher leverage.

Understanding our influence relative to our risk exposure, we decided to concentrate first on the 'Priority Segment', identified in red, with an aim to mitigate risk and maximise impact. We recognise these as being the area where we can make the most significant contribution.

Actions taken to assess and address the risk of Modern Slavery

Kraft Heinz Australia's current practices and initiatives concerned with social compliance are guided by the following policies and procedures:

Due diligence

We have undertaken an extensive supply chain human rights risk assessment, as noted above.

Supplier Guiding Principles

The Kraft Heinz Food Company has a set of Global Principles applicable to its supply chain referred to as the Supplier Guiding Principles, which can be found [here](#) and which include as a minimum the following requirements:

- No forced or bonded labour
- No child labour
- Transparent record-keeping of wages and benefits
- Working hours must comply with applicable local laws
- No discrimination
- No harassment or abuse
- Freedom of association
- Working conditions: suppliers shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards
- No bribery
- Environmental compliance

All Kraft Heinz Australia suppliers and co-packers are contractually obligated to comply with the *Supplier Guiding Principles*, and, if requested by Kraft Heinz Australia, must certify their compliance and allow Kraft Heinz Australia to conduct announced and unannounced audits. In 2020, the Supplier Guiding Principles were extended to all new supplier and co-packers.

Kraft Heinz Australia strives to encourage suppliers to communicate the availability of the Ethics and Compliance hotline to their workers.

Suppliers and/or any of the suppliers' employees, contractors, or agents are also encouraged to report:

1. any potential non-compliance with the Kraft Heinz Supplier Guiding Principles; or
2. any violation or misconduct by any employee, representative or other agent of Kraft Heinz,

to the Kraft Heinz's Ethics & Compliance Hotline www.KraftHeinzEthics.com.

Kraft Heinz Human Rights Policy Statement

In 2019, the Kraft Heinz Food Company released a company-wide, [Kraft Heinz Global Human Rights Policy 2019](#), which is guided by internationally recognized standards, including the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the principles set forth in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Kraft Heinz Global Human Rights Policy sets out high-level expectations around basic human rights and labour rights.

Kraft Heinz Australia requires all employees and related entities, suppliers and business partners to strictly adhere to our human rights standards, which, in summary:

- Prohibit child and underage employment
- Prohibit trafficking, forced or involuntary prison labour
- Prohibit all and any forms of abuse, bribery, harassment and discrimination
- Recognize and respect the rights of freedom of association and collective bargaining
- Recognize and respect fair, legal and equitable work timeframes, working conditions (including health and safety) and wages
- Recognize land rights, natural resources and ensure all workers' rights to clean water and adequate sanitation facilities
- Require all labour recruitment and employment procedures to be carried out in a legal and ethical manner.

Kraft Heinz Australia acknowledges the role and responsibility our business must play in seeking to safeguard human rights through ethical and sustainable business practices. We also recognise that human rights are vital to our own employees, customers, consumers and the communities where we operate.

Further, we have a wide ranging suite of policies and resources, as well as grievance and whistleblowing mechanisms, to ensure we can identify and mitigate any potential risk of modern slavery in our operation, and a culture that encourages people to speak up when they feel like something is not right.

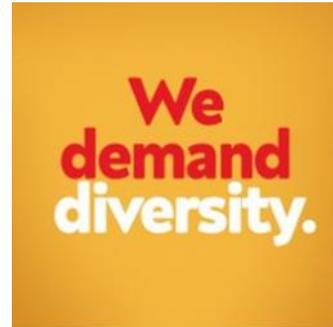
These include:

- **Kraft Heinz Company Employee Code of Conduct:** All employees, officers and directors are required to abide by the company's Global Code of Conduct, which addresses every aspect of our business including anti-corruption, anti-competitive behaviour, data protection and human rights. To ensure compliance with the global Code's tenets, Kraft Heinz regularly provides training, communications, and guidance to our employees around the world.
- **Ethics and Compliance Hotline:** All Employees are able to report ethics or compliance concerns (including suspected incidences of modern slavery) to the Hotline, with multilingual staff available 24 hours a day.

- **Harassment and Discrimination Policy:** Kraft Heinz is an equal opportunity employer and provides equal opportunity in all phases of the employment process. Kraft Heinz prohibits any form of unlawful discrimination or harassment.
- **Speak Up and Investigation Policy:** All Kraft Heinz employees have an obligation to speak up if they become aware of conduct by a company employee or business partner that they believe, in good faith, may violate any law, regulation, or policy, including the Global Code of Conduct. Kraft Heinz will not tolerate any retaliation against an employee who makes a good faith report of misconduct.
- **Kraft Heinz Safety Process (KHSP):** Our framework for health and safety management, ensuring a baseline of legal and regulatory compliance whilst also driving continuous improvement toward world-class performance.
- **Regular training:** for all employees regarding Kraft Heinz Company Employee Code of Conduct and grievance mechanisms.
- **LiveWell Program:** Our health and wellness platform which underscores our commitment to helping employees achieve optimal health.

Diversity, Inclusion & Belonging

Within Kraft Heinz Australia, we focus our Diversity, Inclusion & Belonging strategy around five specific pillars: Gender Equality, Accessibility, Indigenous outreach, LGBTQI+ and Wellbeing & Inclusion. The strategy is brought to life with the endorsement of our senior Leadership team and the support of our employee-led Business Resource Groups (BRGs). In 2021 and beyond we are focusing on enhancing awareness, bringing representation and educating our business, consumers, customers and suppliers.



Human Rights and Sustainability Steering Committee ANZ

In 2019, Kraft Heinz Australia established the *Human Rights and Sustainability Steering Committee*, covering Australia and New Zealand, and which is tasked (among other things) with overseeing Kraft Heinz Australia's adherence to the following globally recognised declarations, principles and goals:

- Universal Declaration on Human Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- International Labour Organisation Declaration of Fundamental Principles and Rights at Work
- United Nations Women's Empowerment Principles
- United Nations Sustainable Development Goals

Third party labour providers

Temporary labour gives our business vital flexibility in times of peak production and demand, but it may also introduce human rights and workplace compliance risks into our supply chains.

In Australia, state-based labour hire licensing schemes assist suppliers to minimise their recruitment and staffing industry risk. All suppliers of temporary labour to Kraft Heinz Australia are contractually

mandated to comply with the relevant labour-hire licensing regimes and the *Supplier Guiding Principles*.

Measuring effectiveness of our actions

We assess the effectiveness of our actions in several ways, including through regular reporting by the Human Rights and Sustainability Steering Committee ANZ to the Kraft Heinz Australia Pty Ltd Board of Directors and ELT on the topics covered in this statement.

In addition, we will continue to:

1. track our effectiveness by means of an employee Engagement Survey, providing employees an opportunity to comment on the areas of concern or success in an anonymous fashion
2. measure implementation of health and safety initiatives through internal audits and self - assessment against Kraft Heinz Food Company's standards and best practices. These results are also reflected in Management-by-Objectives KPIs and Factory Championship rankings; and
3. measure effectiveness of complaints or grievance mechanisms, by number of investigations conducted and where relevant, resolutions reached.

As this is our first year of reporting, we are in the process of developing a robust process to further measure effectiveness of our actions.

Looking ahead

Kraft Heinz Australia is on a journey of continuous improvement, in the next reporting period, 1 January 2021 to 31 December 2021, (**Next Reporting Period**), we intend to focus on the following areas:

Kraft Heinz Australia Own Operations

Kraft Heinz Australia continues to monitor, review and assess risk across our internal operations, including our manufacturing operations. To further evaluate our internal manufacturing sites against a common set of corporate social responsibility standards developed for the consumer goods industry, we have engaged ELEVATE to conduct the Sedex Ethical Trade Audit (SMETA IV) on all of our Australian and majority of our New Zealand manufacturing sites. SMETA IV is an audit based on the conventions of the International Labour Organization, as well as relevant local laws, and assesses the following areas:

- Labour Standards
- Health and Safety
- Management Systems
- Entitlement to Work
- Subcontracting and Homeworking

- Environmental assessment

Kraft Heinz Australia Supply Chain

‘Priority’ Segment Supplier engagement

Following the Kraft Heinz Australia ‘Supply chain human rights’ risk assessment results, we will be mapping in greater detail the supply chains of critical commodities identified through the risk assessment (tomatoes and other fresh produce, cereal and pulse products, oils and fats, seafood, and seasonings and preservatives) and extending our due diligence of the relevant suppliers.

We will also be engaging with ‘Priority’ segment suppliers through a scalable pilot program, which we will be developing in the Next Reporting Period, with a view of further engagement with these suppliers on the assessing and identifying, and supporting them (where relevant) in mitigating and remedying, risks of modern slavery in their operations.

Social Governance Structure and Policy review

Kraft Heinz Australia is committed to upholding responsible business practices and treating people with dignity and respect. We are in the process of further developing our ‘Social Governance Structure’ across Australia and New Zealand and conducting a comprehensive review and update, where relevant, of the policies and procedures.

Driving awareness

We are committed to providing modern slavery training to our auditing and procurement teams, and generally across the business to continue to raise awareness and understanding of the modern slavery risks.

Disclosure Matrix

Mandatory Criteria	Disclosure Reference (Page Numbers)
1. Identify the reporting entity	3
2. Describe the reporting entity’s structure, operations and supply chains	3-6
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	6-9
4. Describe the actions taken by the reporting entity and any entity it controls to assess and address these risks, including due diligence and remediation processes	10-13
5. Describe how the reporting entity assesses the effectiveness of these actions	13

6. Describe the process of consultation with any entities the reporting entity owns or controls	3
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This Modern Slavery Statement was approved by the board of Kraft Heinz Australia Pty Limited (which owns or controls each other Reporting Entity) on 29 June 2021.



Simon Laroche, Director Kraft Heinz Australia Pty Limited

ANJ President