



Kinrise Joint Modern Slavery Statement Financial Year Ending 30 June 2021

1 Introduction and Structure

Kinrise Pty Ltd (ACN 143 389 404) (**Kinrise**) is an Australian food company. It is a parent company of the related entities set out in the table below that make up a diverse portfolio of Australian food businesses united by shared values, shared leadership, and a shared view of the future of food in Australia. Kinrise and its related entities value and embrace diversity and equal opportunity. They are committed to creating an environment that is grounded in respect and is free from discrimination, harassment, and victimisation.

Greens General Foods Pty Ltd (ACN 001 553 564)	Ozpack Holdings Pty Ltd (ACN 115 009 151)
Green's Food Holdings Pty Ltd (ACN 160 202 200)	Propax Pty Ltd (ACN 101 942 312)
Green's Intellectual Holdings Pty Ltd (ACN 165 758 298)	OLHS Pty Ltd (ACN 127 870 008)
Waterwheel Premium Foods Pty Ltd (ACN 162 115 611)	Key Partnerships Australia Pty Ltd (ACN 109 800 937)
Green's Biscuits Pty Ltd (ACN 167 337 439)	

Kin Group Pty Ltd (ACN 095 313 714) (**Kin Group**) is the ultimate holding company of Kinrise and its related entities. Kin Group and its controlled entities comprise an Australian privately owned investment business that invest, own, and operate large industrial, manufacturing, technology, and retail businesses worldwide.

The registered offices of Kin Group and its controlled entities is located at Level 16, 644 Chapel Street, South Yarra, Victoria 3141.

This is the second Joint 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 2021 (**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 in section 2 below, are referred to in this Statement as "the Group" or "our Group".



2. Operations and Supply Chain

Kinrise (and its related entities) operations expand across the areas of developing, manufacturing, packaging, marketing, and sale of food products. Kinrise operations are based in Australia, its food products are also manufactured only in Australia for supply across Australia, New Zealand, New Caledonia, Hong Kong, Japan, Malaysia, Indonesia, USA, and Fiji.

Kinrise manufactures food under the following brands:



The supply chain of products and services that contribute to Kinrise and its related entities 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.



3 Risks of Modern Slavery Practices in the Group's Operations and Supply Chains and actions we take to assess and address these risks

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

Labour hire

A potential area of risk of modern slavery that we have identified that may exist in the Group's operations is through labour hire service providers that we use that may engage foreign or temporary unskilled labour. During this reporting period to address this potential risk, that we classify as low to medium, the Group commenced negotiations to update its terms of supply with labour hire service providers. As part of this process the Kinrise labour hire service procurement agreement template 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, engaged and provided with clear terms of employment that comply with all applicable laws, and are paid and provided all employment related entitlements and rights in accordance with all applicable laws.

Manufacturing equipment and packaging

In the 2021 financial year, the Group partnered directly with more than 531 suppliers. Of those 531 suppliers, only 12 were international suppliers (those 12 coming from 5 different countries), the balance being based in Australia. The spend with these international suppliers represented approximately 3% of the Group's total supplier spend. The 5 international suppliers are based in United States of America, Canada, Great Britain, Netherlands, and New Zealand.

The Group's largest category of spend with international suppliers during the 2021 financial year was on manufacturing equipment and packaging, primarily sourced from the United States of America and New Zealand. According to the Global Slavery Index 2018¹, these countries are not deemed high risk countries and we therefore are of the view that the potential risk of modern slavery in connection with these supply arrangements from these countries to be relatively low.

Manufacturing processes

According to the Australia Red Cross Addressing Modern Slavery Guide for Australian Businesses², the manufacturing sector may potentially contribute 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, and the potential risk is further reduced because the Group's employees have bargained in good faith and agreed their terms of employment set out in the Green's General Foods Pty Limited and Waterwheel Premium Foods Pty Limited (Glendenning) Enterprise Agreement 2019, which was approved and commenced on 11 March 2020. Further, the Group's employees are unionised.

¹ <https://www.globallslaveryindex.org/>

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

³ <https://www.globallslaveryindex.org/>



Purchase of higher risk raw materials

In the course of our Group operations, we purchase raw materials including cocoa and sugarcane. According to the Global Slavery Index 2018⁴, cocoa and sugarcane, when imported into a G20 country, are products that are potentially at risk of modern slavery.

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.

Furthermore, during the reporting period, 15 % of the total cocoa sourced by the Group was UTZ/Rainforest Alliance Certified cocoa. Products that obtain UTZ/Rainforest Alliance certification comply with strict requirements, and UTZ certified farms and companies are audited by independent certification bodies. UTZ/Rainforest Alliance certification requirements include good agricultural practices and farm management, safe and healthy working conditions, addressing child and forced labour, and protection of the environment.

The Group is in the process of reviewing and assessing its strategy to move to source more UTZ/Rainforest Alliance Certified cocoa and expects to be able to comment on this in the course of preparing its modern slavery statement for financial year 2022.

4 Actions we take to assess and address these risks

Our approach to managing modern slavery risks is addressed in various ways.

As reported in the last modern slavery statement for the financial year 2020, the Group's 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 modern slavery identified or suspected via this hotline.

The Group also has the following policies:

- Diversity & EEO Policy
- Work Health and Safety Framework
- Grievance Handling Policy

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 identified and has committed during the next reporting period to expanding the Diversity and EEO Policy to address human rights and how the Group will manage and embed modern slavery risk mitigants and education in its operations.

The Kinrise Work Health and Safety Framework sets out a structure for the management of Health, Safety and Environment within the business. 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;

⁴ <https://www.globallslaveryindex.org/>



- (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.

During that 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.

Since the last modern slavery statement for the 2020 financial year the Group has taken further measures when sourcing the supply of products and services that contribute to our Group's operations. Namely, the Group aims to take into consideration whether the product or item can be sourced domestically in order to further reduce potential risks of modern slavery in the Group's supply chain.

In the last modern slavery statement for the 2020 financial year the Group committed to developing a Supplier Code of Conduct and standards that will apply across all suppliers in the Group's supply chain. The Supplier Code of Conduct was finalised during this reporting period, and the Group anticipates that it will be rolled out to new and current suppliers during the 2022 financial year.

What's more, the Group anticipates that during the 2022 financial year it will implement a supplier questionnaire that will incorporate questions driven to determine the risk of modern slavery in the suppliers' business, operations, and supply chain. This supplier questionnaire will be used to on-board new suppliers, with a view in the future of circulating the questionnaire to existing suppliers for due diligence purposes as well.

5 How we assess the effectiveness of the actions we take to address the risks of Modern Slavery

Since the last reporting period the Group developed:

- (i) a 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 the risks and an assessment of the effectiveness of the controls to address such risks.

In addition, the Audit Risk and Compliance Committee, comprising representatives of Kinrise and Kin Group was established. The Committee's objective is 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 facility participated in a SEDEX members Ethical Trade Audit (SMETA) audit. 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.

As we mature as a business in our identification, assessment and ultimately our remediation of modern slavery risks, we will endeavour to enhance the measures we employ to assess on the effectiveness of actions taken, to ensure that we can continually develop and ultimately improve such measures going forward.

6 Process of consultation with our subsidiaries

In the course of preparing this Statement Kinrise has consulted with each member of the Group specified in section 1, the legal and compliance 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.

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

Signed

A handwritten signature in black ink, appearing to read 'Raphael Geminder'.

Raphael Geminder, Director of Kin