



Modern Slavery Statement FY24



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Preface

This statement is made pursuant to section 13 of the *Modern Slavery Act 2018 (Cth)* (“Modern Slavery Act”) for the period 1 June 2023 to 31 May 2024 (“reporting period”).

This statement is made on behalf of Lamb Weston Australia Holdings Pty Ltd (ACN 629 887 270, otherwise referred to as “Lamb Weston Australia” for the purposes of this statement). Lamb Weston Australia is the applicable reporting entity pursuant to the Modern Slavery Act.

Introduction

Lamb Weston Holdings, Inc. (“Lamb Weston”) is a global producer, distributor, and marketer of value-added frozen potato products to restaurants and retailers around the world. Lamb Weston products can be found in more than 100 countries around the world. Lamb Weston Australia is a wholly owned subsidiary of Lamb Weston.

Our business is built on a foundation of trust. We earn that trust by acting ethically and with integrity in everything we do. In fact, Integrity is one of our core values. We detail our expectations for ethical behavior in Lamb Weston’s Code of Conduct, Supplier Code of Conduct, Human Rights Policy, as well as a range of policies that provide Company guidelines on specific issues.

This inaugural statement for Lamb Weston Australia formalizes our long-standing approach to addressing modern slavery and highlights the work we have undertaken and continue to do up to and including October 2024.

Structure

Lamb Weston is headquartered in Eagle, Idaho, USA. Lamb Weston employs more than 10,000 people around the world in manufacturing plants, sales offices and corporate offices.

Lamb Weston has several subsidiaries that conduct their own day-to-day business and operations while maintaining alignment with a global approach and consolidated financial reporting structure.

In Australia, Lamb Weston’s food manufacturing business is conducted through Lamb Weston Australia and its controlled companies including, for this reporting period, Lamb Weston Australia Pty Ltd (ACN 634 083 846) and its New Zealand Branch (NZBN 9429051874582), Food Coatings Australia Pty Ltd (ACN 670 441 899), Lamb Weston Victoria Pty Ltd (ACN 641 860 899), Marvel Packers Pty Ltd (ACN 097 224 612), Tuber Holdings Pty Ltd (ACN 621 725 380) and Tuber Investments Pty Ltd (ACN 621 731 913).





Operations

Lamb Weston Australia is a producer and marketer of frozen potato products employing more than 100 people in Australia between three potato processing facilities in Victoria and a Head Office in Victoria, Australia. Activities in Australia include sourcing of raw materials (mainly potatoes, packaging, and cooking oil) and converting potatoes into par-fried frozen potato products (chips), which are then marketed and sold to customers.


Lamb Weston Australia also imports frozen potato products from Lamb Weston production facilities in North America and Europe. Products manufactured in Australia and products imported are stored in third-party frozen storage facilities in Victoria, New South Wales, Queensland, South Australia, Western Australia and New Zealand, and are distributed to restaurants, pubs, clubs, cafes and other food serving hospitality businesses across Australia and New Zealand via Foodservice Distributors. Retail products are distributed directly to the customer distribution facilities.

Lamb Weston Australia employs sales professionals to service Foodservice Distributors, Retail customers and Quick Service Restaurant customers in Australia. Lamb Weston Australia has appointed a Distributor in New Zealand to act on our behalf. Orders are received from customers via phone, email and EDI via our National Call Centre. Orders are then processed, and deliveries are scheduled on a daily basis.

Supply Chain and Monitoring

Lamb Weston Australia's supply chain is a combination of local and overseas suppliers' covering various products and services. In fiscal year ending May 2024, we procured potatoes from 35 growers, while other ingredients, packaging and finished goods were sourced from 9 other suppliers. Also in our supply chain, our suppliers include transportation and warehousing service providers as well as providers of facilities management, IT and other services.

Lamb Weston Australia engages and monitors suppliers on Modern Slavery related topics in several ways. Lamb Weston's global Supplier Code of Conduct acts as a foundational element and outlines requirements around compliance with applicable laws, regulations, and practices; workplace and human rights; voluntary employment; child labor avoidance; working hours; and freedom of association amongst other topics. Contracts with Lamb Weston Australia include the Lamb Weston Australia Supplier Code of Conduct, further establishing expectations and requirements on Modern Slavery topics.



Risks of Modern Slavery

Lamb Weston Australia recognizes that potential risks related to modern slavery may arise in its operations and supply chain. However, within our own operations, we assess the risk of modern slavery to be low given the operational oversight as well as the controls that we have in place. In this respect, our internal policies, including our Company Code of Conduct, and core values reflect our commitment to act with integrity which includes implementing and enforcing systems and controls to ensure modern slavery is not occurring.

On the other hand, we recognize that the risk may be higher among our suppliers due to the inherent challenges of maintaining direct oversight. This is especially so with respect to our suppliers who operate in the agricultural sector. For example, to meet the demands of seasonal activities such as sowing and harvesting of crops, casual and temporary workers may be used and these workers typically have fewer employment protections in terms of working hours, adequate compensation, and workplace health and safety, amongst others, compared to those in permanent positions.

On the basis of our recognition that modern slavery risks may exist in the food manufacturing business that we operate in, our Supplier Code of Conduct seeks to provide a guideline of expectations, highlighting key laws and regulations as well as outlining additional requirements that Lamb Weston expects its suppliers to meet, including in the areas of human rights and modern slavery. For example, the Supplier Code of Conduct requests that our suppliers utilize only voluntary employment and ensure proper employment of minors at all stages of farming, manufacturing, delivering, and processing of finished goods.



Actions Taken and Due Diligence Processes

At Lamb Weston, several policies and processes are in place to support identification, mitigation and management of risks, including Modern Slavery risks, in its global operations including in Australia. These policies and processes are further elaborated below.

Policies

Code of Conduct

In 2023, Lamb Weston updated its Code of Conduct to explicitly prohibit the use of forced labor, including human trafficking and slavery. The Code of Conduct and related policies are available to any team member through our internal Ethics and Compliance portal, and select policies are published on our website.

Procurement Policy & Policy on Due Diligence for Channel Partners, Suppliers, and Third Parties

Before engaging or renewing an existing relationship with channel partners, suppliers or other third parties, employees are required to seek prior written approval from Lamb Weston's Legal Department by requesting to start the due diligence process. Lamb Weston considers that engaging in risk-based due diligence on these external parties is an important way for us to identify business partners whose commercial practices align with our purpose, mission and values and to reduce the risk that these partners will engage in unethical or unlawful conduct. During the due diligence process and throughout any subsequent contract period with the third parties, employees are responsible for monitoring their interactions with the third parties for "red flags" and bringing such red flags to the attention of the Legal Department for further advice.

Supplier Code of Conduct

Lamb Weston's Supplier Code of Conduct provides a guideline of expectations, highlights key laws and regulations, and outlines additional requirements that Lamb Weston expects its suppliers to comply with in order to meet our expectation that our suppliers will lawfully conduct their business with the same standards of integrity and ethical behavior. Specifically, suppliers are required to act in accordance with all applicable laws relating to workplace and human rights, and in this regard the Code of Conduct includes clauses prohibiting forced labor (including bonded, indentured and involuntary prison labor) and child labor and requiring that suppliers ensure that their employees work reasonable hours, receive compensation and other benefits in accordance with laws, are provided with a safe workplace free of harassment and are given the freedom to associate, organize and bargain collectively in accordance with laws.

Processes

Pursuant to the Policy on Due Diligence for Channel Partners, Suppliers, and Third Parties, new channel partners, suppliers and other third parties that Lamb Weston Australia works with are screened during on-boarding and regularly thereafter. During the due diligence process and throughout any subsequent contract period with the third parties, Lamb Weston Australia employees are required to monitor their interactions with the third parties to identify “red flags” and report such red flags to the Legal Department for further advice.

In addition, Lamb Weston’s Supplier Compliance Program is comprised of tasks related to qualifying, assessing risk, and auditing suppliers of ingredients, food contact and secondary packaging materials used at Lamb Weston production facilities. This provides opportunities for site audits, during which any risks or concerns relating to Modern Slavery that are identified or witnessed may be reported back to Lamb Weston’s Procurement and/or Legal Department for further assessment and advice.

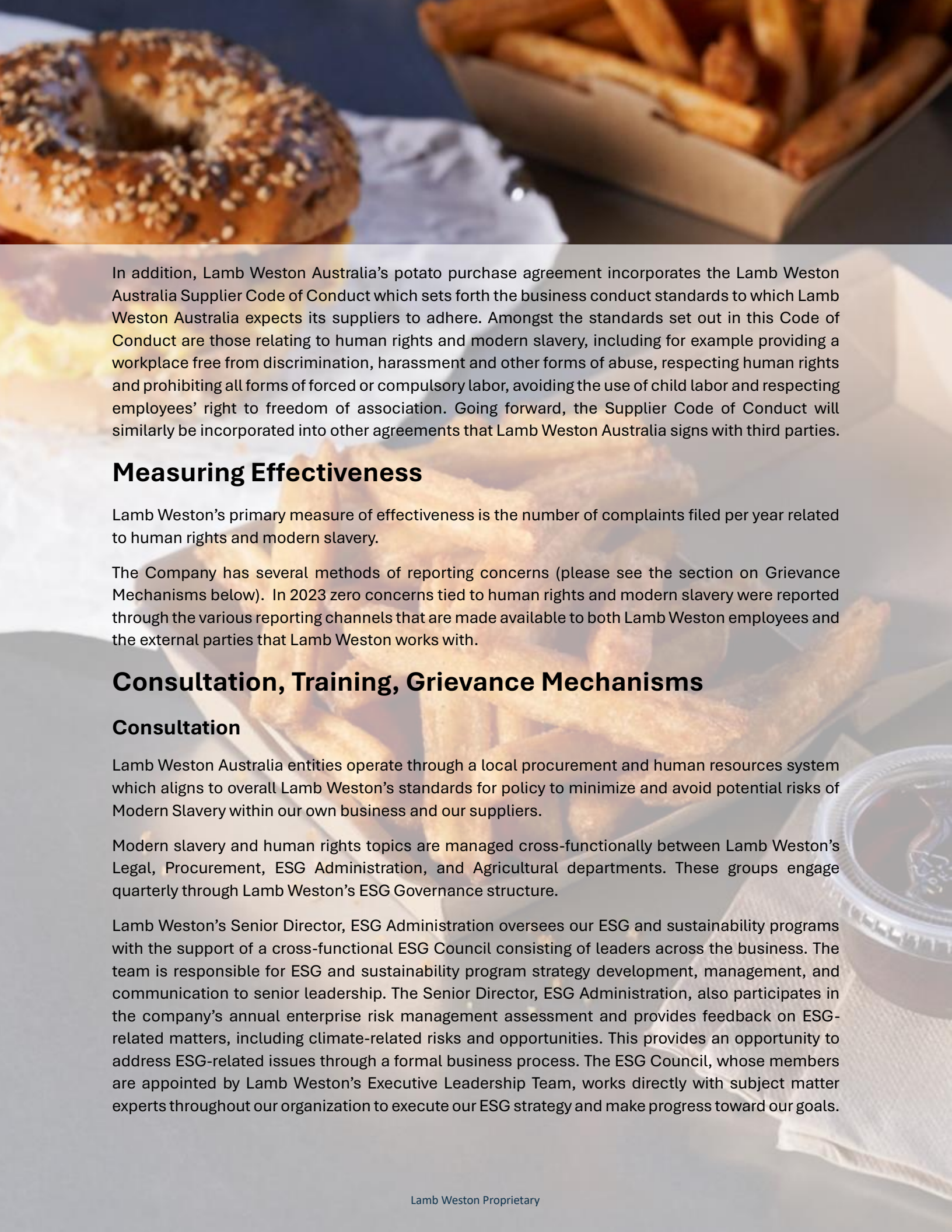
We view our suppliers as partners and frequently engage with them on various issues, including human rights. In 2023, Lamb Weston comprehensively reviewed our purchasing categories to identify those with the highest risk, using region, product/ingredient, and overall sustainability as criteria. Through this process, we identified suppliers that will be monitored for human rights, environmental, ethics, and sustainable procurement practices. Lamb Weston will eventually expand this list, phasing in additional suppliers’ overtime including suppliers supporting our Australian business.

In the same year, Lamb Weston also conducted a double materiality assessment which is a formal exercise aimed at engaging internal and external stakeholders to rank environmental, social and, governance (ESG) issues, increase understanding, identify risks, and prioritize issues. The insights from assessments are used to guide strategies and communication. Results of this assessment is shared each year in Lamb Weston’s Sustainability Report.

Specifically in Australia, Lamb Weston Australia conducts regular visits of growers’ sites. The team also has regular meetings with the growers and reviews all clauses in the growers’ contracts including clauses that address human rights and modern slavery. The growers are also asked to review and sign our Supplier Code of Conduct either at onboarding or on an annual basis. In addition, all growers are accredited by either HACCP or Freshcare (grower accreditation) which provides another layer of third-party audits.

In terms of contractual documentation, Lamb Weston Australia’s General Terms & Conditions for Purchase incorporate the Supplier Code of Conduct by reference and require that suppliers, as well as their subcontractors (if applicable), comply with the Supplier Code of Conduct.





In addition, Lamb Weston Australia's potato purchase agreement incorporates the Lamb Weston Australia Supplier Code of Conduct which sets forth the business conduct standards to which Lamb Weston Australia expects its suppliers to adhere. Amongst the standards set out in this Code of Conduct are those relating to human rights and modern slavery, including for example providing a workplace free from discrimination, harassment and other forms of abuse, respecting human rights and prohibiting all forms of forced or compulsory labor, avoiding the use of child labor and respecting employees' right to freedom of association. Going forward, the Supplier Code of Conduct will similarly be incorporated into other agreements that Lamb Weston Australia signs with third parties.

Measuring Effectiveness

Lamb Weston's primary measure of effectiveness is the number of complaints filed per year related to human rights and modern slavery.

The Company has several methods of reporting concerns (please see the section on Grievance Mechanisms below). In 2023 zero concerns tied to human rights and modern slavery were reported through the various reporting channels that are made available to both Lamb Weston employees and the external parties that Lamb Weston works with.

Consultation, Training, Grievance Mechanisms

Consultation

Lamb Weston Australia entities operate through a local procurement and human resources system which aligns to overall Lamb Weston's standards for policy to minimize and avoid potential risks of Modern Slavery within our own business and our suppliers.

Modern slavery and human rights topics are managed cross-functionally between Lamb Weston's Legal, Procurement, ESG Administration, and Agricultural departments. These groups engage quarterly through Lamb Weston's ESG Governance structure.

Lamb Weston's Senior Director, ESG Administration oversees our ESG and sustainability programs with the support of a cross-functional ESG Council consisting of leaders across the business. The team is responsible for ESG and sustainability program strategy development, management, and communication to senior leadership. The Senior Director, ESG Administration, also participates in the company's annual enterprise risk management assessment and provides feedback on ESG-related matters, including climate-related risks and opportunities. This provides an opportunity to address ESG-related issues through a formal business process. The ESG Council, whose members are appointed by Lamb Weston's Executive Leadership Team, works directly with subject matter experts throughout our organization to execute our ESG strategy and make progress toward our goals.



Training

As a global company, Lamb Weston maintains and enforces our Code of Conduct and human rights-related policies. All new employees receive the Code of Conduct training as part of onboarding and all employees are also required to complete annual training for the Code of Conduct.

Other topics included in annual mandatory learning for certain levels of the organization include anti-corruption, conflicts of interest, information security, and anti-harassment.

During new employee onboarding, team members receive training and information about Lamb Weston's values, two of which are Integrity and Inclusion.

Grievance Mechanisms

Lamb Weston provides several ways to report issues, complaints, and grievances including:

For Employees:

- The employee's supervisor or manager (provided they are not involved in the concerned matter);
- Lamb Weston Human Resources Representative;
- For violations related to bribery, financial recording and reporting, internal accounting controls, an auditing matter or fraud, employees may contact the Audit Committee of the Lamb Weston Board of Directors,
 - by mail: Lamb Weston Holdings, Inc. Attn: Audit Committee of the Board of Directors 599 S Rivershore Ln, Eagle, ID 83616;
 - or by email: audit_committee@lambweston.com;
- Lamb Weston General Counsel: compliance@lambweston.com;
- Lamb Weston Helpline: lambweston.ethicspoint.com or 1800 531 663 (for Australia).

For Suppliers:

- Suppliers are encouraged to ask questions and seek advice before acting, rather than after. Questions may be sent to: suppliers@lambweston.com.

Beyond the Reporting Period

Lamb Weston does not tolerate slavery, forced labor or human trafficking in any form and expects its employees and suppliers to adhere to the same standards. During the 2023 reporting period and beyond, as we continue to address the risks of modern slavery and explore ways to manage the risks across our business and supply chain, we are engaging in several areas to strengthen programs, processes, and policies.

For example, in June 2024, Lamb Weston published its first Human Rights Policy with scope covering Lamb Weston and its subsidiaries worldwide, and each of their employees, corporate officers, and directors, as well as contractors (whether independent or employed by an agency) assigned to work at or for Lamb Weston, regardless of position, location, or level of responsibility. This Policy specifically references the Modern Slavery Act and has provisions for child and forced labor; freedom of association; fair compensation; supplier expectations specific to modern slavery; enforcement; and how to report concerns. Recently, the Policy underwent an analysis to compare current language to the requirements of Australia's Modern Slavery Act. Findings from this analysis are under consideration as part of our annual policy review and update process.

In October 2024, Lamb Weston Australia published its Whistleblower Policy in an attempt to facilitate an environment where the reporting of suspected misconduct or improper state of affairs (amongst others) regarding Lamb Weston Australia and its operations, is encouraged without fear of detriment.

The Supplier Code of Conduct is also currently under review and revision with language around enforcement being considered.

Lamb Weston continues to maintain its EthicsPoint helpline and other grievance reporting capabilities as noted in this statement.

Most recently, Lamb Weston Australia completed its registration with Sedex, a global technology company that specializes in data, insights and professional services to empower supply chain sustainability. Following registration we commenced the self-audit at our main manufacturing site at Hallam North. On completion of the audit, a working group with measured actions will be developed. The working group will also oversee progressive completion of Sedex self-audits at other sites and provide regular feedback and progress updates to the APAC Leadership Team. Completion of Sedex self-audits by our sites will help us monitor modern slavery risks within our operations.

In addition, some of the tools currently used to monitor supply chain in North America are being considered for phased applications to Lamb Weston's global suppliers in other locations including Australia. These tools include EcoVadis Sustainability Assessments and SupplyChainMonitor. The EcoVadis platform is structured on four themes including Labor & Human Rights as well as Sustainable Procurement, and evaluates and scores a company's performance in ESG matters using international sustainability standards such as the United Nations Global Compact. Currently, Lamb Weston self-assesses in this platform to understand our own performance as well as risks within our own operations and works with our suppliers to ensure our supply chain is monitored for risks. On the other hand, SupplyChainMonitor monitors and provides real time updates on any publicly reported human rights or other violations.

In the coming year Lamb Weston will establish a formal sub-group of its ESG Council focused on social accountability and will operate under the ESG Governance structure.



Additional Resources

[Lamb Weston's Fiscal Year 2023 Sustainability Report](#)

[Lamb Weston's Global Human Rights Policy](#)

[Lamb Weston's Supplier Code of Conduct](#)

[Lamb Weston Australia's Purchase Terms & Conditions](#)


[Lamb Weston's Company Code of Conduct](#)

Consultation and Approval

The same management team overseas the business of Lamb Weston Australia and its controlled companies. Accordingly, consultation with these controlled companies has occurred as part of the process.

This statement has been approved by the Board of Directors of Lamb Weston Australia on 26 November 2024 and is signed by its duly authorized Director whose details are set out below.

Signed,

DocuSigned by:

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Simone Jane Gibson
Director, VP and GM APAC

