

MODERN SLAVERY STATEMENT

REPORT FOR THE FINANCIAL YEAR ENDED 30 JUNE 2020

FREEDOM FOODS GROUP LIMITED ACN 002 814 235



MAKING FOOD BETTER

Executive Summary

Executive Summary

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking.

Freedom Foods Group Limited and its related bodies corporate (collectively, the **Group**) comply with all applicable laws including, without limitation, laws relating to modern slavery, anti-slavery and anti-human trafficking.

The Group is committed to, and expects its contractors, customers, distributors, suppliers and other business partners to also be committed to:

1. acting ethically and with integrity in all aspects of business;
2. implementing effective systems and controls to ensure modern slavery in any part of their supply chains is not tolerated; and
3. transparency in the approaches to tackling modern slavery in line with the disclosure obligations under the Modern Slavery Act 2018.

The Group is committed to assessing, monitoring and mitigating the risks of modern slavery and broader human rights risks in its organisation supply chains in line with Freedom Foods Group's corporate values, stakeholder and community expectations and the law.

Criteria

1 & 2

IDENTIFY THE REPORTING ENTITY AND DESCRIBE ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Reporting Entity

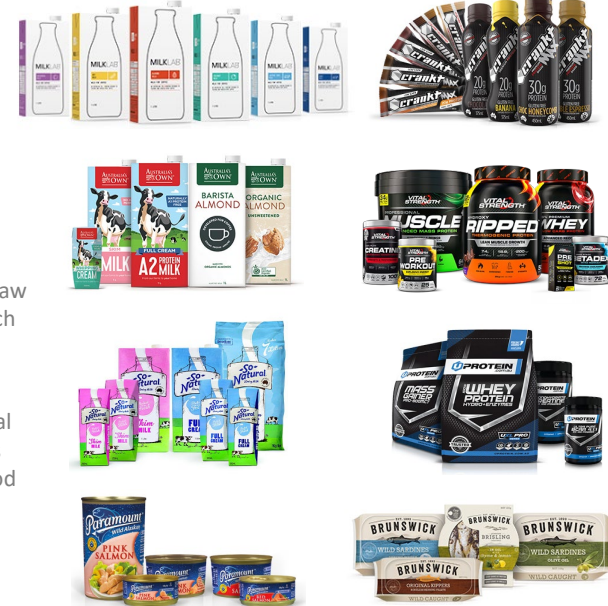
- The reporting entity is Freedom Foods Group Limited ACN 002 814 235.
- Freedom Foods Group Limited is registered as an Australian Public Company with annual revenue that exceeds the Modern Slavery Act's minimum mandatory reporting threshold of \$100 million.
- Freedom Foods Group is Australian owned and operated and is listed on the Australian Stock Exchange.

Structure & Operations

- The Group's business is the manufacturing and supply of healthy food products throughout the domestic and international markets.
- Key product markets include dairy milk, plant-based beverages, nutritional and seafood products.
- The Group employs approximately 650 employees globally with over 90% of employees based in Australia.

Supply Chains

- The Group's supply chains span across the globe and across its business sectors including its manufacturing, sales, distribution and general business activities.
- The majority of the Group's material suppliers are Australian including its milk and packaging suppliers.
- The Group has approximately 60 direct milk suppliers from dairy farms across Australia.
- In addition to its milk suppliers, the Group has 35 key raw materials and packaging suppliers, the majority of which are Australian.
- The Group has mapped out its supply chains and consolidated the data into its material suppliers by total dollar expenditure. This data will be the principal focus area for ongoing analysis in each future reporting period and will be updated accordingly.



Criteria

3

DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY AND ANY ENTITIES IT OWNS AND CONTROLS

Risks

- During the reporting period, the Group completed a comprehensive risk assessment to understand the modern slavery risks within its operations and supply chains. The risk assessment was based on principles promulgated by 'The Social Responsibility Alliance' (STRT).
- Within the Group's operations, migrant workers account for a proportion of its workforce. Some of these migrant workers are directly employed by the Group and others are employed through third party employment services providers. While many of the Group's migrant workers are Australian permanent residents, the Group recognises the increased vulnerability of migrant workers and continues to take steps to uphold and maintain all work rights and ethical standards.
- The Group's management processes, including working rights checks (both initial and ongoing) and onboarding procedures, has resulted in a low risk assessment of modern slavery in relation to its migrant workers.



Criteria

4

DESCRIBE THE CONTROLS AND THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITIES IT OWNS OR CONTROLS TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

- Sedex is an organisation that provides one of the world’s leading online platforms for companies to manage and improve working conditions in global supply chains. Sedex provide practical tools, services and a community network to help companies improve their responsible and sustainable business practices, and source responsibly.
- Annual audits by customers who use Sedex require the Group to supply data and satisfy the Sedex requirements which are confirmed during the site visits.
- The Group is committed to achieving the following equal employment opportunity objectives:
 - ensuring that all recruitments and promotions are based on objective assessments to determine the best qualified candidates for the role;
 - ensuring all employees are treated fairly in a safe and respectful work environment through internal policies and company culture; and
 - fully utilise and develop the potential of every employee.
- The Group has policies, programs and processes in place to mitigate modern slavery risks across its operations and supply chains. These include, but are not limited to:
 - ensuring all Group team members hold relevant working rights in Australia and ensuring compliance with all visa conditions where applicable;
 - training for team members covering fundamental governance principles, including the Groups code of conduct, grievance mechanisms, workplace behaviors;
 - resources dedicated to human resource management and policies to address modern slavery and anti-human trafficking;
 - high union membership and engagement;
 - resources, systems and processes to administer team member payments; and
 - incorporating obligations within its contracts with third-parties to mitigate modern slavery risks in its supply chains both up and down stream.



Criteria

4 Cont.

DESCRIBE THE CONTROLS AND THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITIES IT OWNS OR CONTROLS TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

Controls & Actions

- The Group utilises third-party systems and databases to guide and streamline its supplier risk assessment process which requires suppliers to complete a questionnaires through Sedex and SRA. These questionnaires:
 - help the Group obtain key factual data about the supplier's operations which can be used to support risk assessments outside the platform;
 - allow the system itself to generate an initial risk profile; and
 - provide a repository of suppliers and key details to assist program administration.
- Once a supplier risk is identified, suppliers may be required to undertake an ethical audit. In most circumstances, suppliers assessed as high risk will require an audit every 12 months and a supplier assessed as moderate risk will require an audit every two years.
- Through suppliers' participation in the Group's risk assessment processes, the Group can monitor and evaluate its upstream supply chain and take appropriate actions to mitigate risks.
- While non-conformances identified during these risk assessments and audits have not identified any confirmed cases of modern slavery, the Group will continue to monitor its operations and supply chains for any indicators of modern slavery risks being present.



Sedex

SRA

Criteria

5, 6 & 7

DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF THESE ACTIONS, THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS and ANY OTHER RELEVANT INFORMATION

Effectiveness

This is the first comprehensive review of the modern slavery risks across the Group's operations and supply chains. As such, assessment of the Group's controls and actions will be undertaken in the next reporting period. This initial process has increased transparency and awareness of modern slavery risk across the Group's operations and supply chains and this will continue going forward with each report period.

Consultation

The comprehensive review that was undertaken in preparation for this modern slavery statement included a review of the operations of the entities which Freedom Foods Group Limited (the reporting entity) owns or controls.

Any other relevant information

The Group believes that its continued efforts to assess, monitor and mitigate modern slavery will further contribute to its ethical culture across the business and increase awareness of the importance of the abolishment of modern slavery throughout its supply chains.

ENDORSEMENT

THIS MODERN SLAVERY STATEMENT HAS BEEN ENDORSED BY THE BOARD OF
FREEDOM FOODS GROUP LIMITED



GENEVIEVE GREGOR
CHAIR OF THE BOARD



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