



**Carman's**  
*Real food made with real passion...* 

**MODERN SLAVERY ACT  
STATEMENT 2023**

1 JULY 2022 TO 30 JUNE 2023



**Carman's**  
*Real food made with real passion.*



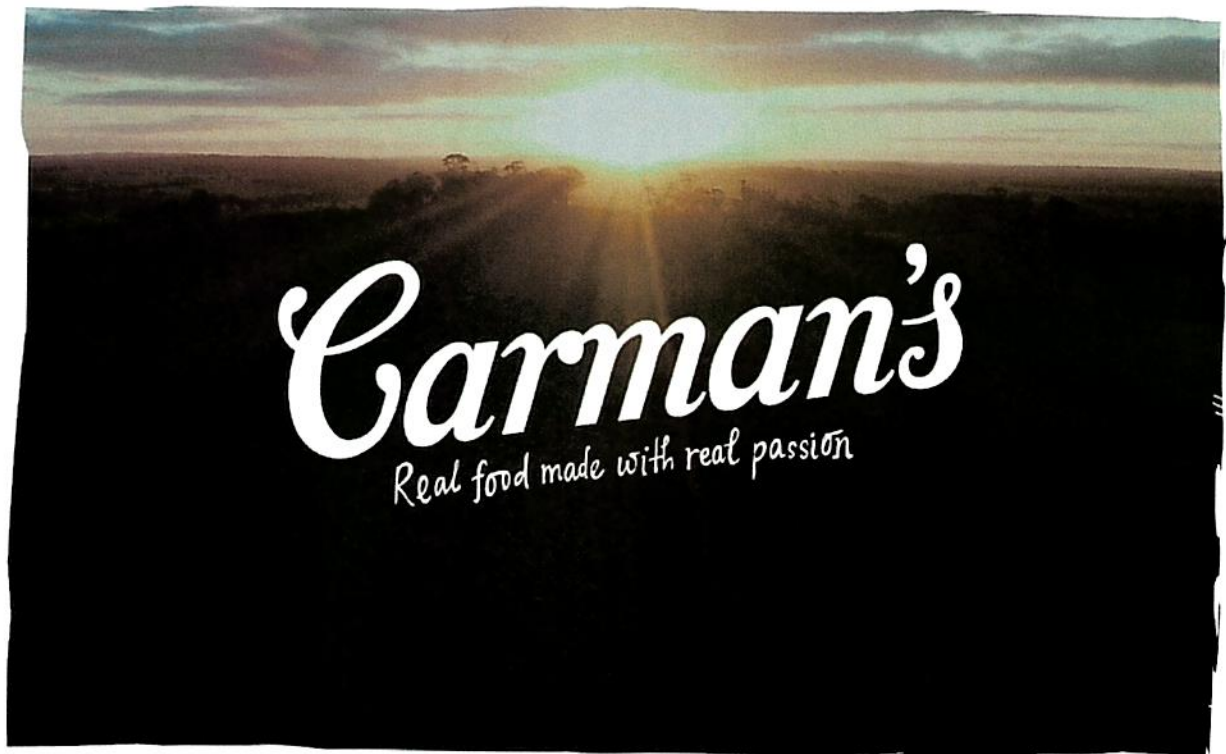
## INTRODUCTION

Carman's Fine Foods is a privately held food company, with Caroly Creswell as its founder, owner and sole director. Carman's Fine Foods operates independently, without control over any other entities, eliminating the need for external consultations.

This statement has been created to address "Modern Slavery Act 2018 (The Commonwealth Act)" for Carman's Fine Foods, 11 Hume Street Huntingdale VIC 3166.

Carman's recognise that Modern Slavery is an issue within Australia and beyond, and we have a responsibility to identify and report any relevant activities in our operations and supply chain.

This statement is prepared on behalf of Carman's Fine Foods Ltd, ABN 37 109 604 202, to support the reporting period of 1 July 2022 to 30 June 2023.





## OUR STRUCTURE & OPERATIONS

Carman's Fine Foods was established in 1992 and has been creating delight every day for consumers ever since. This means everything we do flows from that; how we source our ingredients, care for our customers and how we approach every element of our business and operations. Carman's is committed to making high quality, premium products whilst making a difference in people's lives.

Carman's is proud to be an Australian owned and operated company. Our head office is located in Melbourne, and we have a small production facility based in the Adelaide hills. We work with several supply chain partners within Australia who produce, store and transport products on behalf of Carman's.

At the time of reporting, Carman's Fine Foods has approximately 115 employees.

In line with our business values, Carman's is fully committed to supporting the eradication of slavery and human rights violations in the modern world. We are committed to working collaboratively within our supply chain to address any issues related to modern slavery and mitigating any risks that are identified.

Carman's operates to bring out the better in everything we do, right throughout our supply chain. This includes:

- Promoting fair work practices throughout our supply chain by supporting and encouraging ethical trading and modern slavery compliance with our partners
- Sourcing materials sustainably to reduce social and environmental impact, supporting local businesses where possible.
- Ensuring we are making conscious choices throughout our supply chain.

Carman's recognises that modern slavery is not only an issue overseas, but can also be an issue within our local manufacturing systems. We take this very seriously and would encourage any concerns to be reported to our Consumer Care Team on 1300 555 885 or via our whistleblower service at [carmanskitchen@stoline.com.au](mailto:carmanskitchen@stoline.com.au) or <http://carmanskitchen.stolinereport.com/>

Carman's adheres to high quality standards to ensure the provision of safe food to our consumers, using the best quality ingredients we can source. Our key supply chain partners have strict vendor assurance programs in place, and as part of this they review and understand the risks in our supply chains on modern slavery and ethical sourcing.

The raw materials used in Carman's products are sourced locally where possible, however we also source some raw materials from international suppliers. We expect our local and global manufacturers alike to ensure due diligence is applied to all modern slavery risks in their supply chains.



## MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN & OPERATIONS

There are several potential modern slavery risks in the Carman's supply chain:

### Directly linked

Carman's collaborates with a variety of Australian businesses to support operations at its Melbourne headquarters and Adelaide production facility. This creates a direct operations connection that may pose exploitation risks through these channels. All companies associated with Carman's have contractual agreements stipulating compliance with local labour requirements.

### Indirectly linked

Carman's relies on various supply chain partners for the manufacturing, storage and transport of products. This creates an indirect link to potential risks of modern slavery, forced labour and/or worker exploitation through these third-party channels. The procurement of raw materials via manufacturing partners also introduces a commodity risk associated with modern slavery.

## MODERN SLAVERY RISK ASSESSMENT & ACTION PLAN

Carman's has proactively conducted a comprehensive assessment of modern slavery risks with all relevant suppliers. This initiative has proven instrumental in acquiring crucial information and gaining insights into our suppliers' level of understanding and commitment to modern slavery risk mitigation.

We have also assessed if any of our raw materials are sourced from countries with high-risk of modern slavery; an average of 58% of our ingredients are sourced from Australia, with remaining ingredients sourced from countries including Argentina, China, India, Indonesia, Malaysia, Nigeria, Pakistan, the Philippines, Turkey, Ukraine and Vietnam. To mitigate the modern slavery risks associated with sourcing from these high-risk countries, our manufacturing partners have visibility of their supply chain risks via approved supplier programs. This has helped improve our visibility of sourcing processes throughout the supply chain, and we aim to further improve and develop this over the coming years.

Carman's have also reviewed information from the following resources:

- UN Guiding Principles on Business and Human Rights, 2011
- Commonwealth Modern Slavery Act 2018 Guidance for reporting entities
- Walk Free Foundation & SEDEX, for industry and country specific modern slavery risks.

In our commitment to mitigate modern slavery risk, Carman's has established a robust approved supplier program and have implemented a dedicated Modern Slavery Policy, Sustainability Policy, Ethical Sourcing Policy. Addressing concerns related to the indirect supply chain, Carman's utilises supplier assurance checklists to systematically gather modern slavery commitment information from our manufacturing partners, conducting a thorough evaluation of supply chain risks. As an active member of SEDEX, we leverage the platform to foster connections with key suppliers, facilitating in-depth understanding and analysis of supply chain risks and associated ratings.



## EFFECTIVENESS OF ACTIONS

Carman's assesses the effectiveness of its measures against modern slavery through the following initiatives:

- Our Approved Supplier Program involves screening and risk assessment for both new and existing suppliers via a supplier assessment questionnaire. This program mandates all suppliers to share information related to ethical trading and modern slavery.
- Our Whistleblower Policy and operating procedures are accessible to all employees, providing a channel to report any breaches or grievance related to potentially illegal business practices.
- Key suppliers undergo assessment via the SEDEX data exchange platform, offering a comprehensive review of supplier risk.
- Procurement contract terms explicitly reference compliance with modern slavery legislative requirements.

Carman's have not, to our knowledge, had any reportable incidents, and at the time of publication of this report have nothing to disclose. Should such incidents be uncovered, the entity acknowledges its obligation to report and remediate in an ethical manner.

In the event of an incident, given its smaller organisational size, Carman's would collaborate with the Australian Border Force (AMF) team to ensure remediation in accordance with requirements. Carman's values transparency and, if legally permissible, would share details of any reportable incident to enhance awareness of modern slavery. Most importantly, our priority will always be the welfare of the individual/s directly involved.

Carman's organisational actions have undergone review by its Senior Leadership Team. The organisation has elevated awareness of the Modern Slavery Act and reporting requirements. As parts of its ongoing efforts in this realm, Carman's aspires to increase compliance, working towards impactful initiatives that contribute to improved outcomes globally.

## COVID-19 IMPACT

The lingering effects of COVID-19 persist in our supply chain, although to a lesser degree than in previous years. Our risk mitigation capabilities have substantially improved, minimising the potential for material shortages and delays, also ensuring adequate care and support is given to staff and their health and wellbeing. Importantly, we are unaware of any modern slavery impacts resulting from COVID-19 in any of our operations.

Carman's remains committed to operating under COVID-safe plans, which undergo continuous review and are updated in alignment with government advice.



## FUTURE COMMITMENTS

In FY24 Carman's will implement further actions to oppose modern day slavery through the following initiatives:

- We will continue to empower and educate our workforce on modern slavery risks, rolling out training to all employees.
- We will update supplier requirements to include responsible sourcing declarations.
- We are committed to enhancing our supply chain risk framework for a more thorough assessment of potential modern slavery risks within Carman's supply chain.
- Leveraging SEDEX, we will systematically evaluate modern slavery risks against each of the commodities that we purchase from risk countries and incorporate feedback to ensure effective management of any identified high-risk issues.
- We are looking into implementation of an audit program for our high-risk manufacturers to manage and mitigate these risks.
- We are working to attain B-Corporation certification as a reflection of our commitment to set a high standard for all areas of corporate responsibility, including the fair and ethical treatment of all people in our supply chain.

This statement has been reviewed by the Senior Leadership Team of Carman's Fine Foods and is signed off by the sole owner and founder.



Carolyn Creswell

Date: 18.12.23

