

# **MODERN SLAVERY STATEMENT**

*The following statement sets out the actions taken by Australian British Foods to address modern slavery risks in our business and supply chains.*

This Modern Slavery Statement is prepared and issued by the Australian British Food Holdings Pty Ltd, ACN 613 306 826 (*hereinafter referred to as ABFH*) and is made pursuant to the *Modern Slavery Act of 2018 (Cth)* in respect of ABFH and all its wholly owned and controlled subsidiary companies and refers to the period 1 July 2023 to 30 June 2024. This document is issued on 14 October 2024.

## **Introduction**

This is ABFH's 3rd Modern Slavery Statement, outlining our ongoing efforts to identify, manage, and mitigate modern slavery risks within our business and supply chains. We remain fully committed to upholding the highest ethical standards and will not tolerate or support any form of modern slavery in our operations or supply chain.

## **About Australian British Foods**

ABFH is a privately owned food manufacturer with operations in Perth, Sydney and Brisbane. Proudly Australian-owned, we have been supplying quality sausages to Australia for more than 20 years. Our product range covers fresh and cooked sausages, burgers, fresh sausage rolls, cooked ham and bacon products.

The company has formed long-term partnerships with an array of leading supermarkets within Australia.

## **Organisational Structure, Operations and Supply Chain**

ABF manufactures and distributes our products from our Perth, Sydney and Brisbane factories. Australian British Foods directly employs around 300 people, as well as utilising short-term specialist contractors, and 3PL providers.

Raw materials and packaging for ABF products are sourced from over 500 Australian and international suppliers, and includes product categories such as protein, ingredient cartons and sleeves, trays, outer cartons, and film.

## **Potential Risks of Modern Slavery**

Throughout the financial year 2024, ABFH continued to implement initiatives to assess and mitigate potential modern slavery risks within our operations and supply chains. ABFH's operations, based in Australia, operate under strict regulations and compliance standards, which contribute to a relatively low risk of modern slavery.



Most of our supplies are sourced from countries with lower risks, such as Australia, the UK, and Denmark. However, a small portion of supplies may be imported from countries in Asia, where modern slavery risks are slightly elevated. ABFH acknowledges that geography is an important factor in assessing these risks and will continue to use this as a basis for developing appropriate mitigation strategies.

**Actions to address Modern Slavery Risks**

In the past year, ABFH has continued to implement actions to address modern slavery risks in our operations and supply chains. These include the following:

**Appointment of Key Roles:** To strengthen our commitment to compliance and ethical practices, ABFH has recruited a Group HR Manager to ensure employment compliance and a Group Financial Controller to oversee financial reporting and supplier engagement. These appointments reinforce our ability to manage risks related to modern slavery across all aspects of our business.

**Supplier Engagement:** Continued engagement with suppliers to ensure transparency on modern slavery risks, including the distribution of our Supplier Code of Conduct & Ethical Standards and obtaining signed declarations.

**Ongoing Ethical Auditing:** ABFH remains subject to regular external audits through SMETA (SEDEX Members Ethical Trade Audit), which assess our operations against labour standards, health & safety, and business ethics.

ABFH has in place formal policies that promote ethically and legally compliant business conduct. These policies, which mitigate the risk of human rights violations that support modern forms of slavery, include the following:

ABFH RELEVANT POLICIES	
<input type="checkbox"/>	Ethical Employment Policy
<input type="checkbox"/>	Employee Code of Conduct
<input type="checkbox"/>	Equal Employment Opportunity, Harassment and Workplace Bullying Policy
<input type="checkbox"/>	Whistle Blower Policy
<input type="checkbox"/>	Grievance & Dispute Standard/Policy

These policies are included in the employee handbook and formed part in the on-boarding process of newly hired employees. These policies are also stored in ABFH’s SharePoint and are readily accessible by all employees.

As a member of SEDEX (Supplier Ethical Data Exchange), ABFH uses the platform and independent tools to assess supplier performance, aiming to have all high-risk suppliers registered. When ethical



issues arise, ABFH engages directly with suppliers to resolve concerns, seeking corrective action plans and monitoring completion. If suppliers fail to address issues, ABFH may escalate actions, including terminating business relationships.

ABFH also participates in regular external audits through SMETA, covering labour, health and safety, business ethics, and environmental standards. Additionally, the company remains active in local communities, donating products to support vulnerable populations, including organizations like Second Bite.

### **Assessing the Effectiveness of our Actions**

During this reporting period, ABFH undertook several key initiatives to strengthen our approach to managing modern slavery risks:

- **Awareness and Capacity Building:** We focused on increasing awareness and capacity building for team members around modern slavery risks. This included integrating a modern slavery information session into the agenda of our Annual National Conference to further educate employees.
- **Supplier Engagement:** We continued to engage with key suppliers to gain greater transparency regarding modern slavery risks within their operations and the mitigation activities they are implementing.
- **Supplier Code of Conduct:** We are currently drafting and reviewing ABFH's Supplier Code of Conduct & Ethical Standards. Once finalised, we will begin distributing the document to our suppliers and seek signed declarations to confirm their acknowledgment and commitment to our standards.
- **Contractual Obligations:** We ensured that all new agreements and contracts executed by ABFH include specific clauses addressing modern slavery, further embedding compliance expectations across our supply chain.
- **Supplier Assurance Process Improvements:** We assessed and explored improvements to our existing supplier assurance processes to enhance the identification and management of modern slavery risks.

We continue to monitor the effectiveness of our actions to remove the risk of modern slavery from our operations and supply chain by:

- Investigating any reports received from employees, the public, or law enforcement agencies that indicate the existence of modern slavery practices.
- Having our policies, procedures, and practices subject to external ethical auditing. ABFH is subject to SMETA (SEDEX Members Ethical Trade Audit) auditing, which assesses our operations against Labour, Health & Safety, Sourcing, Environment and Business Ethics standards.
- Remediation and management reporting of breaches identified by internal/external audit programs or Whistle-blower sources.



- Engagement with stakeholders on modern slavery issues or concerns, including procurement team members, suppliers, third-party auditors, and customers.
- Periodic corporate social responsibility risk assessment of our supplier base.

### **Our Future Commitments**

ABFH remains committed to continuous improvement around modern slavery, and the following next steps have been identified.

- Continue to address and act on the progress made for the past commitments.
- Conduct quarterly reviews with the Procurement and QA teams to monitor and address modern slavery risks within our supply chain.
- Conduct a comprehensive review of ABFH policies to ensure they remain effective and relevant in addressing modern slavery risks.
- Develop a framework for suppliers to report their mitigation activities and any challenges faced in addressing modern slavery risks.
- Review and finalise the Supplier Code of Conduct & Ethical Standards, ensuring it clearly outlines expectations related to modern slavery.
- Conduct a review of current supplier contracts to identify any gaps in addressing modern slavery.

### **Remediation**

Where a legitimate modern slavery issue or concern is raised through one of our grievance mechanisms, ABFH is committed to work with our suppliers, customers, government, worker representative bodies to ensure that appropriate remedy or corrective action is provided.

Our grievance mechanisms include (a) Whistle Blower Policy, and (b) Grievance and Dispute Resolution Standard Policy.

### **Approval for this Statement**

This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth). It has been approved by the Board of Australian British Food Holdings.

Signed:



Mark Rintoul  
Managing Director  
Australian British Food Holding

