

MARLEY SPOON

Modern Slavery Statement 2021

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Marley Spoon acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures, and to Elders both past and present.

Introduction

This is Marley Spoon Australia's second Modern Slavery Statement. It has been published in accordance with the Modern Slavery Act 2018 (Cth) (the Act). It outlines our structure, operations and supply chains, and what we do to identify and address the risks that modern slavery potentially poses to our business and supply chains. This statement is made in respect of Calendar Year 2021.

People are the core of what we do at Marley Spoon. This means we take care of our customers and our team members. It also means we look out for the many others who help us in the pursuit of our mission – to continuously delight our customers in a personalized and sustainable way. We are committed to achieving a global business environment that is free from exploitation and abuse of vulnerable people and recognize that, on our part, this means pursuing continuous improvement in our own processes for identifying and eliminating modern slavery risks.

A Message From Our CEO



Marley Spoon Australia is proud to be a purpose-led business, with a strong set of values and principles that informs everything we do. We're guided by our values of sincerity, determination, passion, diversity, accountability and integrity – all of which are important when it comes to choosing the best suppliers and partners to work with throughout our supply chain.

The issue of modern slavery unfortunately and sadly remains a risk and, for too many people, a reality. We are determined to continually champion best practices and the highest standards with a mission to eliminate modern slavery in our supply chains and to drive positive change. In 2021, Marley Spoon Australia implemented an online training module. This module, which was available to all team members, included critical information on how to identify and stop modern slavery in supply chains, emphasizing that modern slavery has no place at Marley Spoon.

We are committed to upholding fundamental human rights while supporting the wellbeing of all people involved with Marley Spoon – whether they are directly involved in our business operations or are members of the communities we serve – and will continue to work towards ending modern slavery.

This statement was approved by the Board of Directors of MarleySpoon Pty Ltd on 20 May 2022.

A handwritten signature in black ink, appearing to read "Rob Weber". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Managing Director
Marley Spoon Australia

May 2022

Our Structure, Operations and Supply Chains

STRUCTURE

MarleySpoon Pty Ltd (ACN 603 969 571) (**Marley Spoon Australia** or the **Company** or **we**) is a private company incorporated in Australia. It is a subsidiary of Marley Spoon AG, a company incorporated in Germany and listed on the Australian Securities Exchange (ASX: MMM), and which also owns subsidiaries in the European Union and the United States of America. Marley Spoon Australia did not control any other entities during 2021. The Company's registered office is located at Sydney Corporate Park, 190 Bourke Road, Alexandria NSW 2015. Marley Spoon Australia has operated business since 2015.

Our Brands

We operate two key brands: Marley Spoon and Dinnerly:



Marley Spoon

Meal kit
subscription service



Dinnerly

Meal kit
subscription service

Marley Spoon and Dinnerly are subscription-based weekly meal kit services. A meal kit is a box, usually sent directly to a customer's home, which includes the required quantity of ingredients to cook two or more meals, along with step-by-step recipe instructions.

OPERATIONS

Our operations are located wholly within Australia and we serve customers across all eight states and territories. Ingredients are ordered from suppliers on an 'order to use' basis and delivered to one of our fulfillment centres, where they are picked and packed into boxes as final products in accordance with customer orders, then shipped directly to those customers. During 2021, we operated fulfillment centres located in Sydney, Melbourne and Perth.

Customers all over Australia receive their boxes on a weekly basis, usually directly to their homes. Marley Spoon Australia partners with delivery professionals to ensure the

best possible delivery experience for customers.

Marley Spoon employs approximately 566 team members in its operations on either a full time, part time, casual or contract basis.

Key business partnerships

In June 2019, Marley Spoon entered into a five-year strategic partnership with Woolworths Group Limited, pursuant to which the parties collaborate on the promotion and marketing of the Marley Spoon and Dinnerly brands, growing these brands and their customers in the Australian market. In 2021, Marley Spoon commenced participation in Woolworths' Everyday Rewards loyalty program, allowing members of the program to earn Everyday Rewards points by making purchases through the Marley Spoon and Dinnerly websites.

SUPPLY CHAIN

For each of our brands, we source high quality ingredients from a range of suppliers. The most important category of supply for us is food. We source a wide variety of edible products, including fruits, vegetables, meat, dairy and condiments. Marley Spoon Australia has an 'Australia first' sourcing policy and almost all of our direct suppliers are located in Australia. In 2021, an average of 77% of ingredients each week was sourced from an Australian origin. We are actively working towards increasing this percentage year over year by switching to Australian-made and grown products, as well as working with Australian-owned companies.

Through this approach, we ensure the highest standards of food quality and safety for our customers, maximizing our contribution to the Australian economy at the same time. The vast majority of the food and other materials that we procure come from suppliers with which we have stable, long-term relationships. Having regard to availability, quality and cost, some of our suppliers also source some products internationally, which means that some elements of our products are also produced and packed outside of Australia, including Italy, Vietnam and Indonesia. Countries listed on the Global Slavery Index which have a high prevalence of modern slavery were listed in our sustainability questionnaire in 2021 to increase the effectiveness of our risk-screening process.

Identifying Risks

Most of our team members are employed directly, which lowers the risk of modern slavery practices occurring within our team. Our assessment of these risks is accordingly more focused on those parts of the business that use contracted labour and third-party service providers (which are kept at minimal levels). Workers in these areas may include permanent or temporary migrants, students and other persons who may be more vulnerable to exploitative labour practices. The use of labour hire agencies is strictly limited to registered providers which are compliant with Australian labour hire rules and regulations.

Whilst Australia is typically considered a relatively lower risk jurisdiction for modern slavery practices, Marley Spoon Australia recognizes that being a purchaser of a wide variety of food products that are produced and packaged in Australia, modern slavery risks are also present in our domestic supply chains. In particular, the reliance of the agricultural industry on third party labour, temporary migrant workers, younger people, students and backpackers, often working on a casual or seasonal basis, gives rise to the risks of deceptive recruitment, forced labour and debt bondage. The risks in this area are greater, due to lower levels of literacy, education, experience, and knowledge of rights among such workers, as well as higher levels of reliance on the employer. We have identified that, within Australia, these are the risks that are most salient to our business.

The same types of risks, including child labour, may also be present in Marley Spoon's international supply chains.

Addressing Risks

During the reporting period, Marley Spoon Australia used a range of tools and approaches to address the risk of modern slavery practices in our operations and supply chains. These tools and approaches, outlined below, are implemented through our policies, contracts and programs.

BUILDING THE RIGHT CULTURE

In line with our values and our commitment to continuously delight our customers in a personalized and sustainable way, Marley Spoon is relentlessly focused on developing and maintaining an organisational culture which ensures that the way we deal with our stakeholders – including our suppliers and partners – embodies the core values and commitments that we hold dear as a company; these are:

- ✓ **Sincerity** – We act boldly in an open, honest and responsible manner.
- ✓ **Determination** – We act decisively with a sense of urgency.
- ✓ **Passion** – We challenge the status quo with energy and enthusiasm.
- ✓ **Accountability** – We focus on outcomes and deliver on commitments and communicate internally and externally.
- ✓ **Integrity** – We treat others as we expect to be treated in attitude, communication and personal safety.
- ✓ **Diversity** – We are committed to a diverse and inclusive work environment, where everyone is treated fairly and with respect, regardless of gender, age, disability, ethnicity, marital or family status, religious or cultural background, sexual orientation, sexual preference, language and other areas of potential difference.

These core values and commitments are expressed in our global Code of Conduct, to which all of our team members are required to adhere. The Code of Conduct also sets out the standards expected throughout the Company with respect to:

- ✓ Conflicts of interest
- ✓ Anti-bribery and gifts
- ✓ Privacy
- ✓ Fair dealing
- ✓ Discrimination, bullying, harassment and vilification
- ✓ Health and safety
- ✓ Compliance with laws and regulations

The Company's Whistleblower Policy also provides important means by which team members can call out what may be breaches of the law, or of the standards we apply

to ourselves and our stakeholders. All team members are encouraged to report any suspicion of wrongdoing, without fear of retaliation, and with the option of anonymity.

Whilst the Code of Conduct is not targeted specifically at addressing the risks of modern slavery, we consider that it is an integral part of our commitment to treating people with fairness and respect, and these values also underpin our commitment to a global business environment that is free of modern slavery practices.

Marley Spoon has a zero-tolerance policy with respect to any threat of physical or sexual violence, harassment or intimidation against employees and their families and close associates.

All Company policies are clearly defined and communicated to all employees.

MODERN SLAVERY TRAINING

In 2021, Marley Spoon introduced for the first time an online modern slavery training module for team members. The module includes information about what modern slavery is, as well as how to best identify and report instances of it.

SUSTAINABILITY MANAGER ROLE AND FRAMEWORK

In 2021, Marley Spoon had a full time Sustainability Manager. This role oversees and supports Marley Spoon's three sustainability framework pillars: Our Planet, Our People, Our Community. Under the three pillars, the sustainability team supports and works with other teams to ensure the completion of relevant training, audits and other measures to achieve transparency and reduce risks in the supply chain.

EXTERNAL AUDITS

We engage expert workplace consultants to conduct annual, independent audits of our compliance with the relevant Modern Award. These audits are based on a random sample of employees, and seek to identify any errors that may have been made with the remuneration and related entitlements of employees. This ultimately helps us to ensure that all employees are properly compensated for their efforts. The Company is conscious of the inadvertent under-remuneration that has occurred in some Australian workplaces in recent years, and is committed to ensuring this does not happen at Marley Spoon Australia.

SUPPLIER ONBOARDING AND MONITORING

At Marley Spoon Australia we work only with approved food and non-food vendors and items. In 2021, this approval process was managed partly by way of supplier questionnaires and requests for information. In 2021, Marley Spoon required suppliers to complete a questionnaire which included key questions relating to modern slavery risks. The results of this questionnaire were analysed, and each supplier was given a sustainability score. Over the course of the year, a more specialized Modern Slavery Questionnaire was established; the intention is that all suppliers will have completed it by the end of 2022. The answers will be analysed to identify modern slavery risks that may exist in connection with any of our suppliers.

Also in 2021, Marley Spoon Australia has enhanced its supplier onboarding and monitoring capabilities by partnering with FoodsConnected to introduce a software portal-based supplier management tool, designed specifically for onboarding, auditing and monitoring suppliers. Through the use of this tool, we are achieving an approach to supplier onboarding and management that is more holistic, consistent, detailed and transparent, assisting us to manage supply processes from end to end.

INGREDIENT TRANSPARENCY

We believe that enhancing supply chain transparency is an important part of the overall approach to minimizing modern slavery risks, enabling consumers to better understand the origins of our products. Through our Ingredient Hub, customers and members of the public can view the ingredients contained in each of our weekly recipes on a line-by-line basis including, for each individual ingredient, the percentage which has an Australian origin. The introduction of FoodsConnected also allows Marley Spoon to log the origin of each ingredient, providing another avenue to screen the risk of modern slavery in supply chains.

COMMUNITY CORPORATE PARTNERSHIP

In 2021, Marley Spoon worked with Community Corporate, an award-winning diversity and inclusion company, to offer employment to those supported by the organisation. Community Corporate supports refugees with a number of programs, partnering with Marley Spoon to provide connections to employment within our teams. In 2021, Marley Spoon onboarded several new team members through this partnership.

POST-REPORTING PERIOD ACTIONS

Marley Spoon aims to undertake new initiatives in 2022 to further combat the risks of modern slavery practices.

These include:

- ✓ Completion of our online modern slavery training module by 100% of our permanent team members.
- ✓ Completion of online training by the Quality, Sustainability, Safety and Sourcing teams to ensure that all staff engaging with suppliers understand the risks associated with modern slavery practices.
- ✓ Having all suppliers sign updated standard trading terms which prohibit modern slavery practices and require compliance with the Act.
- ✓ Having all suppliers complete a modern slavery-specific questionnaire by the end of 2022.
- ✓ Settling on a formal risk categorization framework that is utilised if the risk of modern slavery is identified in our supply chains.
- ✓ Continuing our partnership with Community Corporate to build refugee-focused training and recruitment programs.

Assessing Effectiveness

Marley Spoon Australia is working to better understand the effects and efficacy of its actions to address modern slavery risks. We collect information and monitor the performance of the Company's various initiatives in the following ways:

- ✓ Tracking the results of our internal and external audits, and comparing these across time periods.
- ✓ Number and nature of issues raised through the whistleblower process and other grievance mechanisms.
- ✓ Percentage of team members who have received modern slavery training.
- ✓ Percentage of contracts requiring counterparties to comply with all applicable laws relating to modern slavery practices.

Managing COVID-19

The Company continued to navigate and manage the challenges and risks posed by COVID-19 during 2021, including by introducing a Company-wide vaccination policy.

Moving Forward

Modern slavery has no place in Marley Spoon's business or extended supply chains, or indeed in the broader business community. We have welcomed Australia's modern slavery reporting initiative, which we believe will play an important role in risk reduction. We are committed to a continuous improvement approach to ensure that we are not directly or indirectly acquiescing in unacceptable labour practices, and are introducing new, targeted initiatives in 2022 as outlined above.

Assessing and addressing the risks of modern slavery is one aspect of the Marley Spoon Group's holistic approach to operating a sustainable business that benefits our stakeholders and the broader community. For further information relating to governance generally or the Group's approach to discharging its environmental, social and governance responsibilities, our latest Group Corporate Governance Statement and our Sustainability Report can be viewed online at:

<https://ir.marleyspoon.com/investor-centre/>.

