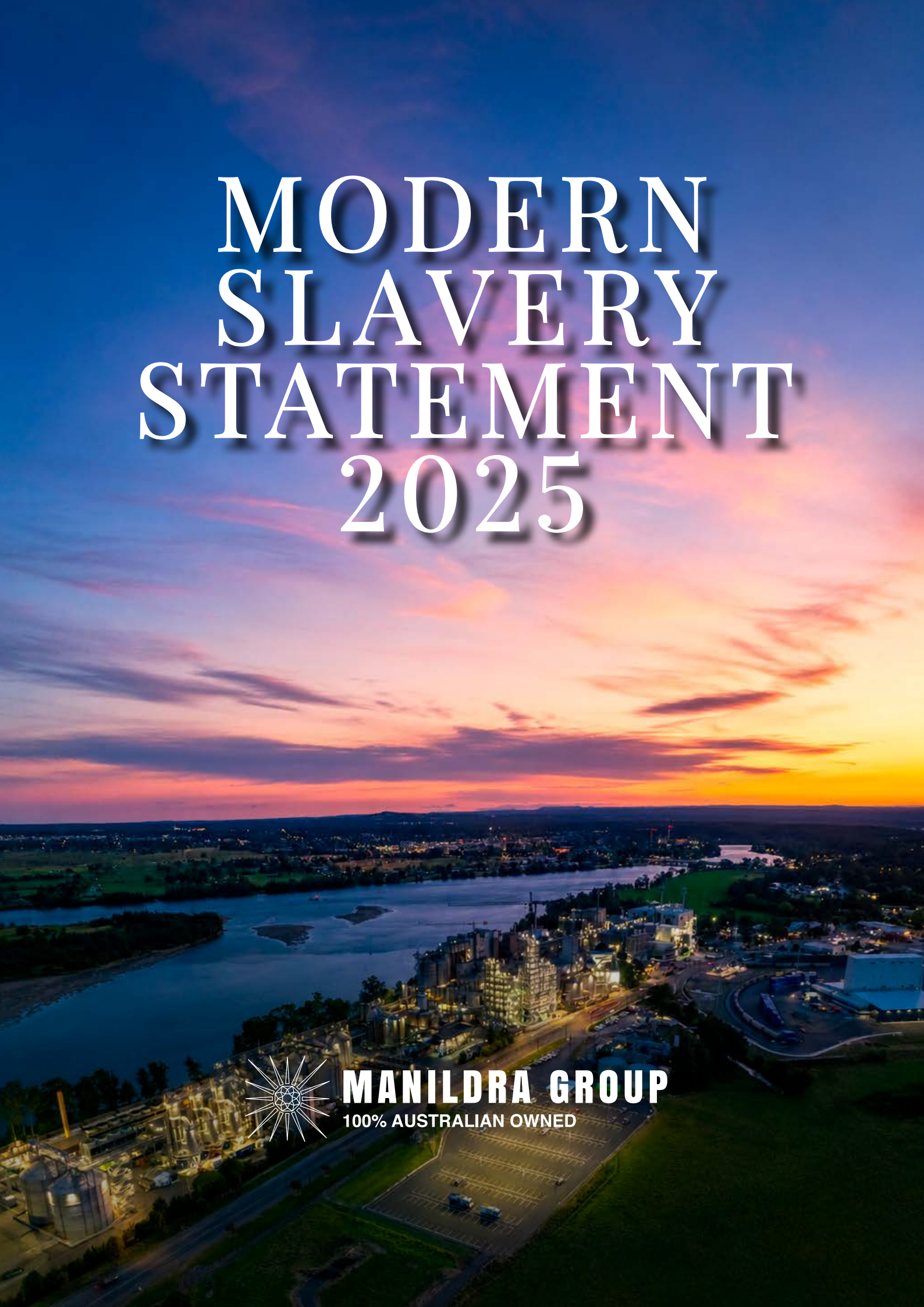
MODERN SLAVERY STATEMENT 2025



MANILDRA GROUP

100% AUSTRALIAN OWNED

COVER: Sun sets over Manildra Group's Shoalhaven Starches located in Nowra, New South Wales // PHOTO: DEAN HOLLAND

ABOUT THIS MODERN SLAVERY STATEMENT

This *Modern Slavery Statement* has been prepared in accordance with the requirement of the *Modern Slavery Act* 2018 (Cth).

This *Modern Slavery Statement* has been issued by GOTW Pty Ltd (trading as Manildra Group and referred to throughout as 'Manildra Group') and its wholly owned subsidiaries.

The Statement provides a consolidated description of the actions taken to assess and address the risk of modern slavery in the operations and supply chains of Manildra Group for the period July 2024 to June 2025.

ENTITIES COVERED BY THIS STATEMENT

This Statement applies to every wholly owned entity of Manildra Group, and all entities of which Manildra Group assumes control.

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Golden fields of wheat in northern New South Wales // PHOTO: GRACE QUAST

MESSAGE FROM OUR MANAGING DIRECTOR



John Honan, Manildra Group Managing Director // PHOTO: ADRIAN HARRISON

Aerial view of the Shoalhaven Starches site in Nowra, New South Wales // PHOTO: DEAN HOLLAND

From the beginning of our family business in 1952, with a flour mill at Manildra in the New South Wales central west region, the Manildra Group of Companies have proudly maintained our strong family values through a core belief in our people and products. Our company's foundation is built on our values, which distinguish us and guide our actions. Respect for our employees, customers and suppliers – and our relentless focus on providing safe, fulfilling workplaces – are fundamental to the way Manildra Group operates.

We continuously invest in our employees and state-of-the-art manufacturing sites, and more widely in the local communities in which we operate, as crucial to our sustainable Australian industries and regional areas that support them. Pivotal to our world-class manufacturing sites across Australia, and in the United States, are more than 1,100 employees globally, who are extended members of our family-owned and operated business for more than 70 years.

Sourcing the great majority of our raw ingredients from local Australian farmers, our biggest cost and input is premium Australian wheat. We partner with thousands of local farmers to purchase wheat, sugar and canola – some of these relationships spanning the full seven decades and three generations of our family business – to produce 100 per cent Australian food and industrial ingredients that exceed the highest quality, environment, social and government standards. Successfully managing our operations and sourcing responsibly rely on visibility, transparency and accountability in our business relationships.

Since the development of Manildra Group's inaugural *Modern Slavery Statement* in 2021, the reliability of our supply chain has been reinforced to our partners in the pandemic. Having thoroughly outlined the steps taken to identify, manage and mitigate specific risks of modern slavery in our diversely integrated operations and supply chain, we appreciate the complexity of this growing problem, and remain steadfast in our commitment to upholding human rights and striving for positive impact to all people – on whom we depend across the full value chain.

During the reporting period, Manildra Group continued to strengthen its environmental, social and governance framework and maintain a strong focus on responsible sourcing, human rights and ethical business practices across its operations and supply chain. Our commitment to eliminating modern slavery remains embedded within our policies, procedures and stakeholder engagement activities.

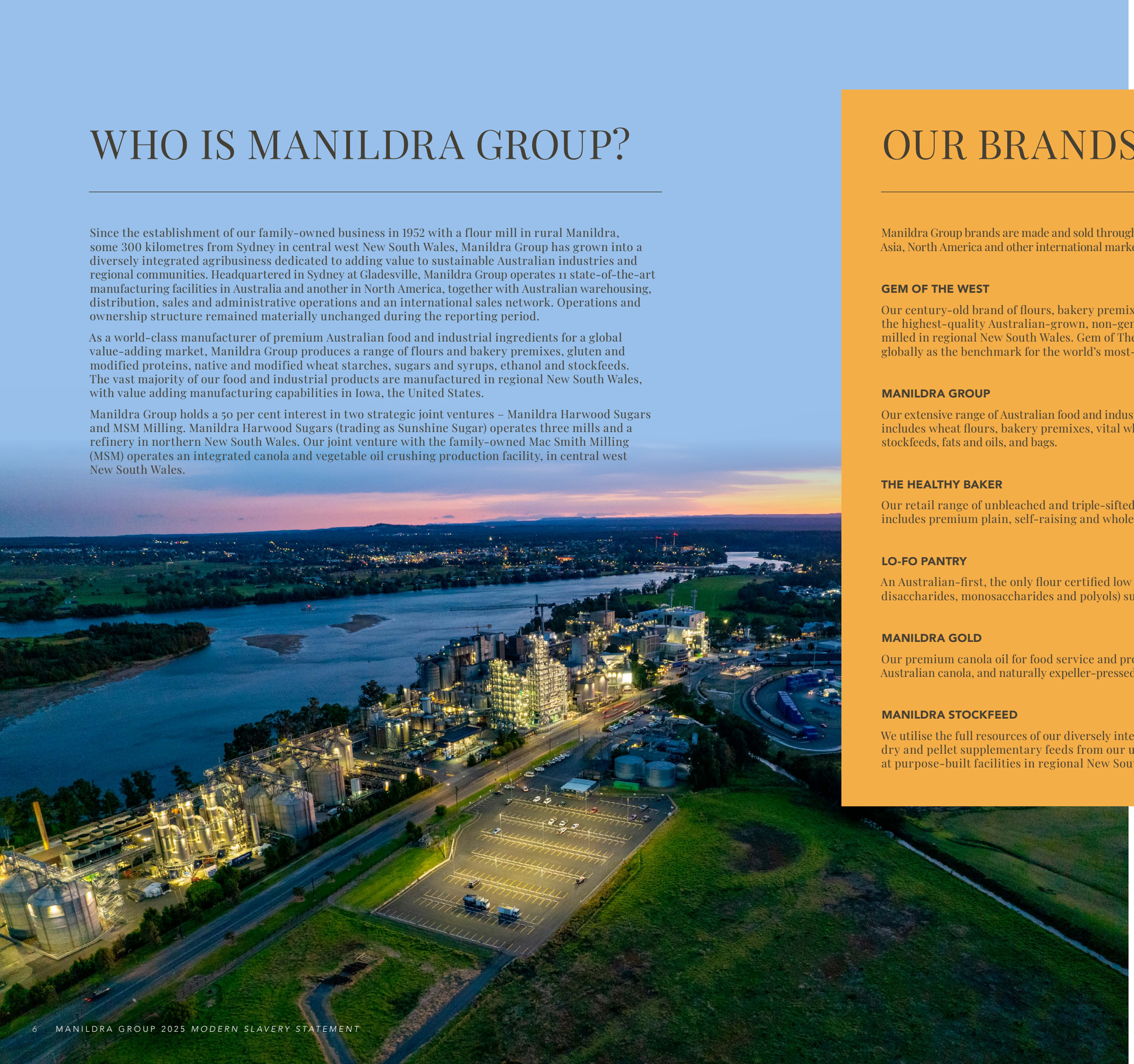
Putting Australia first for more than 72 years, Manildra Group has always worked closely with our suppliers, customers, farmers, and employees, to ensure responsible conduct for the shared sustainability of our industries and rural and regional communities that support them. With great pride in our seven-decade legacy of maintaining highest standards of ethical conduct, universal human rights, environmental responsibility and community contribution. Manildra Group's future will always hold a strong culture of corporate social responsibility and sustainability – the foundation for the next generation of our family's 100 per cent Australian-owned business.

WHO IS MANILDRA GROUP?

Since the establishment of our family-owned business in 1952 with a flour mill in rural Manildra, some 300 kilometres from Sydney in central west New South Wales, Manildra Group has grown into a diversely integrated agribusiness dedicated to adding value to sustainable Australian industries and regional communities. Headquartered in Sydney at Gladesville, Manildra Group operates 11 state-of-the-art manufacturing facilities in Australia and another in North America, together with Australian warehousing, distribution, sales and administrative operations and an international sales network. Operations and ownership structure remained materially unchanged during the reporting period.

As a world-class manufacturer of premium Australian food and industrial ingredients for a global value-adding market, Manildra Group produces a range of flours and bakery premixes, gluten and modified proteins, native and modified wheat starches, sugars and syrups, ethanol and stockfeeds. The vast majority of our food and industrial products are manufactured in regional New South Wales, with value adding manufacturing capabilities in Iowa, the United States.

Manildra Group holds a 50 per cent interest in two strategic joint ventures – Manildra Harwood Sugars and MSM Milling. Manildra Harwood Sugars (trading as Sunshine Sugar) operates three mills and a refinery in northern New South Wales. Our joint venture with the family-owned Mac Smith Milling (MSM) operates an integrated canola and vegetable oil crushing production facility, in central west New South Wales.



OUR BRANDS

Manildra Group brands are made and sold throughout Australia and exported to customers across Asia, North America and other international markets, including:

GEM OF THE WEST

Our century-old brand of flours, bakery premixes, starches and glutens is sourced from only the highest-quality Australian-grown, non-genetically modified and pesticide-free wheat, milled in regional New South Wales. Gem of The West is today renowned by the baking industry globally as the benchmark for the world's most-consistent premium vital wheat gluten.

MANILDRA GROUP

Our extensive range of Australian food and industrial products for domestic and export markets includes wheat flours, bakery premixes, vital wheat gluten and proteins, starches, syrups, ethanol, stockfeeds, fats and oils, and bags.

THE HEALTHY BAKER

Our retail range of unbleached and triple-sifted Australian flours and specialty premixes includes premium plain, self-raising and wholemeal flours, and protein-boosted base mixes.

LO-FO PANTRY

An Australian-first, the only flour certified low in FODMAPs (or fermentable oligosaccharides, disaccharides, monosaccharides and polyols) supports dietary requirements for gut health.

MANILDRA GOLD

Our premium canola oil for food service and production industries is sourced from 100 per cent Australian canola, and naturally expeller-pressed in regional New South Wales.

MANILDRA STOCKFEED

We utilise the full resources of our diversely integrated to formulate a range of high-performance dry and pellet supplementary feeds from our unique dried distillers grain syrup (DDG-S), at purpose-built facilities in regional New South Wales.

Aerial view of the Shoalhaven Starches site at sunset
// PHOTO: DEAN HOLLAND

CORPORATE STRUCTURE AND OPERATIONS

Manildra Group is wholly owned by GOTW Pty Ltd, one of Australia's largest privately-owned businesses, with two strategic joint ventures in regional New South Wales.

MANILDRA GROUP



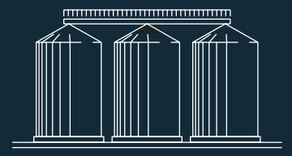
FLOUR MILLS
Nowra, Manildra, Gunnedah, Narrandera (Australia)



WAREHOUSES
18
(Australia)



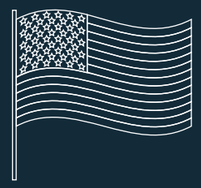
BAKERY PREMIX PLANTS
Altona, Rocklea, Manildra (Australia)



GRAIN STORAGE SITES
Manildra, Moree, Bellata, Bogan Gate, Grong Grong, Stockinbingal, Tabbita (Australia)



SHOALHAVEN STARCHES
Bomaderry
(Australia)



MANILDRA MILLING USA
Leawood Kansas, Hamburg Iowa
(United States)



INTERNATIONAL SALES OFFICES
United States, Korea, Taiwan, Philippines, Indonesia, Malaysia, China



GLOBAL HEADQUARTERS
Gladesville, Sydney
(Australia)

JOINT VENTURES



MSM MILLING
Manildra
(Australia)



MANILDRA HARWOOD SUGARS
Harwood, Condong, Broadwater
(Australia)



NATIVE AND MODIFIED WHEAT STARCHES
- Fine paper, paper, and pulp
- Paper packaging and sacks
- Corrugated cardboard and boxes
- Adhesives • Noodles and dumplings
- Sauces • Confectionary
- Tortillas, soups, and savoury baked goods
- Bricks, plasterboard, cement, and other construction products
- Water clarifying and settling agency



FLOUR AND BAKERY MIXES
- Sweet and savoury baked goods
- Cakes • Lamingtons • Cupcakes
- Pancakes • Biscuits
- Pastas • Pizzas • Breads • Tortillas
- Noodles



CO_2
- Carbonated drinks
- Dry ice • Domestic gasifiers
- Food refrigeration and packaging
- Fire suppression



MAKING THE MOST OF EVERY GRAIN

As a world-class advanced manufacturer, Manildra Group value-adds to 100 per cent of the Australian wheat grain – producing all-Australian food and industrial ingredients for a diverse range of speciality and staple products across the global value chain.



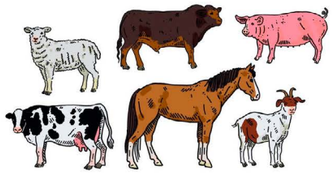
ETHANOL
- Alcoholic spirits and ready-to-drink brands • E10 and E85 petrol • Sanitisers and sprays • Medicines and tablets
- Hairspray and other personal care products • Solvents and detergents
- Coatings and lacquers • Printing inks



VITAL WHEAT GLUTEN AND MODIFIED PROTEINS
- Performance drinks • Protein shakes
- Pet food
- Sweet and savoury baked goods
- Meat and dairy extender or substitute
- Plant-based products
- Aquaculture feeds
- Shampoo and other personal care products



SYRUPS
- Brewing
- Confectionery
- Ice-cream, milkshakes and other dairy products



STOCKFEED
- Dried Distillers Grain and Syrups (DDG-S) pellets for livestock and equine performance

ILLUSTRATIONS: EASTY BEASTY

MODERN SLAVERY RISK ASSESSMENT AND RESPONSE

At Manildra Group, upholding human rights is fundamental to the sustainability of our business, local Australian industries, and the rural and regional communities integral to our shared success. We unreservedly respect internationally recognised human rights principles and remain committed to identifying, assessing and addressing modern slavery risks across our operations and supply chains. Responsibility for advancing this commitment has been assigned to relevant members of management and is supported through established governance, policy and assurance frameworks.

During FY2025, Manildra Group continued to assess modern slavery risks across its operations and supply chains. No material change was identified in the overall modern slavery risk profile of the organisation. The organisation's modern slavery risk assessment remained current during FY2025 and continued to identify a low overall modern slavery risk profile across Manildra Group's operations and supply chains. No new modern slavery risks, geographic risk changes, industry-specific risk changes or high-risk supplier categories were identified during the reporting period.

Consistent with previous reporting periods, Manildra Group considers higher inherent modern slavery risks to arise primarily within certain international supply chains associated with imported goods and ingredients, rather than within its direct Australian operations. This reflects the predominantly Australian-based nature of the Group's operations, workforce and primary agricultural supply chain, together with the governance, due diligence and assurance activities maintained across the business.

To address gaps in policies and procedures to combat modern slavery and other human rights risks identified in our global supply chain review, an action plan developed in 2021 included the formation of a working group established to progress key actions. Since that time, Manildra Group has continued to strengthen its framework for identifying, assessing and managing modern slavery risks across its operations and supply chains.

Among key engagement activities performed since our review to identify and eliminate specific supply chain risks of modern slavery, Manildra Group has:

Implemented the inaugural *Modern Slavery Statement* 2021, developed in response to specific supply chain risks identified within our national operations and through stakeholder partnerships, including:

- establishment of our *Modern Slavery Policy*, affirming our commitment to eliminate modern slavery and supporting awareness and training activities for supervisors and managers;
- implementation of our *Human Rights Policy*, affirming our commitment to respecting recognised human rights across our operations and supply chains; and
- prioritisation of the Australian Government right-to-work verification framework for new employees, to ensure appropriate validation of legal working rights in Australia.

Strengthened governance, policies and assurance activities through:

- ongoing review and implementation of policies and procedures relating to modern slavery, human rights, ethical conduct and workplace rights;
- periodic independent assessment of selected operations through SEDEX and SMETA audit programs;
- enhancement of governance arrangements supporting ethical business conduct, transparency and responsible business practices; and
- ongoing monitoring of labour standards, workplace health and safety, environmental practices and ethical business conduct at accredited sites.

Enhanced supplier engagement and procurement controls through:

- requesting modern slavery statements from suppliers subject to reporting obligations;
- requiring completion of Responsible Business Practices Questionnaires as part of supplier onboarding and approval processes;
- applying a risk-based approach to supplier due diligence and procurement activities;
- incorporating expectations relating to human rights, dignity, respect and ethical conduct within supplier terms and conditions;
- engaging suppliers and customers regarding responsible sourcing and sustainability expectations; and
- continuing the assessment of supplier practices and commitments relevant to human rights and modern slavery risk management.

Maintained external certification and responsible sourcing frameworks through:

- participation in the Supplier Ethical Data Exchange (SEDEX) program;
- undertaking SMETA assurance activities at accredited Manildra Group sites;
- maintaining certification requirements associated with the Roundtable on Sustainable Biomaterials (RSB); and
- participation in external sustainability assessment frameworks supporting continuous improvement in responsible business practices.

No actual or suspected incidents of modern slavery, forced labour, human trafficking or related human rights abuses were identified within Manildra Group's operations during the reporting period. No modern slavery-related complaints, whistleblower reports or remediation activities were identified or required during FY2025.



Aerial view of Shoalhaven Starches at sunset, the largest gluten and starch manufacturing site of its kind in the world
// PHOTO: DEAN HOLLAND

ETHICAL BUSINESS PRACTICES

During FY2025, Manildra Group maintained participation in the Supplier Ethical Data Exchange (SEDEX) and continued annual SMETA auditing activities. SMETA assessments of accredited sites reviewed labour standards, health and safety, environmental performance and ethical business practices.

During FY2025, accredited sites included Shoalhaven Starches, Manildra Flour Mill, Altona Mix Plant, Narrandera Flour Mill and Clyde Warehouse.



Harvest sunset in central west New South Wales // PHOTO: CHRIS WATSON

GOVERNANCE AND SUSTAINABILITY

During FY2025, Manildra Group continued strengthening governance arrangements supporting environmental, social and governance performance.

The ESG and Sustainability Committee, established in 2023, provides strategic oversight of sustainability initiatives, stakeholder engagement, external reporting and responsible sourcing activities. The Committee is chaired by the Chief Financial Officer and includes representatives from Sustainability and Environment, Energy, Corporate & Government Relations and Risk & Governance functions.

The Board of Directors maintains overall oversight of sustainability, ethical governance, corporate integrity and human rights matters.

RESPONSIBLE BUSINESS PRACTICES

As part of our long-standing commitment to sustainable and ethical business practices, Manildra Group has continued to catalogue the ongoing education of our employees and in particular, our myriad supply chain partners – from input suppliers to downstream customers – to reinforce our obligations to proactively ensure we are all aware of our shared responsibilities. This includes a zero-tolerance policy for any modern slavery practices, corruption, conflicts of interest, or unethical conduct.

Since 2022, we have implemented a number of training programs and external engagement initiatives for stakeholders across our sphere of operations. Manildra Group's training and outreach includes questionnaires and educational literature, as well as individual discussions with suppliers on topics such as:

- Land and human rights
- Modern slavery practices
- Whistleblower protection
- Anti-bribery and anti-corruption measures
- Harassment-free workplaces

Manildra Group has appointed dedicated executives to act as responsible managers for the conduct and enforcement of our policies. In addition, we have outsourced to independent companies the task of receiving calls from whistleblowers or any eligible member of the Manildra Group community who wishes to anonymously discuss issues of concern.

ROUNDTABLE ON SUSTAINABLE BIOMATERIALS

To maintain our international Roundtable for Sustainable Biomaterials (RSB) certification, Manildra operations must adhere to RSB Principle 4 – to not violate human or labour rights, and to promote decent work and for worker wellbeing; and RSB Principle 5 – to contribute to the social and economic development of local, rural and indigenous people and communities in regions of poverty and acute disadvantage.

RSB Principle 4 explicitly prohibits any slave labour and provides for:

- Workers' freedom of association to organise and collectively bargain;
- Workplaces free from any discrimination
- Remuneration in accordance with international conventions and local laws and regulations;
- Conditions of workplace health and safety to international standards; and
- Transparent mechanisms to ensure the same for international third-party contractors.

RSB principle 5 requires improvement to the socioeconomic status of local stakeholders impacted by operations – including special measures implemented to encourage participation by, and benefit to, women and youth, indigenous communities, and the vulnerable in regions of poverty and acute disadvantage.

SUPPLIER ETHICAL DATA EXCHANGE

Manildra Group abides by the Supplier Ethical Data Exchange (SEDEX) audit to assess social and business practices across our supply chain. SEDEX works with buyers and suppliers to deliver improvements in responsible and ethical business practices in global supply chain.

The audit process provides a framework to assess responsible supply chain activities regarding business ethics, labour standards, health and safety, and the environment. The SEDEX Members Ethical Trade Audit (SMETA) assesses our operations to ensure ethical trading and corporate social responsibility at selected sites owned and operated by Manildra Group.

During FY2025, Manildra Group continued to maintain its SEDEX membership and associated SMETA auditing activities as part of its approach to assessing labour standards, health and safety, ethical business conduct and environmental performance through the business.

Manildra Group also participated in external sustainability assessments and reporting frameworks, including EcoVadis assessments. EcoVadis has assessed Manildra Group's sustainability performance since 2018. During FY2025, Manildra Group continued to participate in the EcoVadis sustainability assessment framework and was awarded an EcoVadis Committed Badge. This recognition reflects Manildra Group's ongoing commitment to strengthening sustainability governance, documentation and management systems across areas including labour and human rights, environmental management, ethics and responsible procurement.

AUSTRALIAN INDUSTRY PARTICIPATION

Manildra Group actively supports Australian Industry Participation (AIP) as a core business policy by providing full, fair, and reasonable opportunity for local industry to supply goods and services, through the AIP Authority planning and procurement framework.

Next-generation rolling stock is strengthening Manildra Group's integrated supply chain with greater capacity and reliability // PHOTO: CHRIS WATSON

EMPLOYEES AND REPRESENTATION

Manildra Group's workplaces are equitable, safe and supportive. Manildra Group directly employs more than one thousand people across Australia and international operations, with the majority based in regional and rural New South Wales.

Our United States staff are directly employed by Manildra Milling USA. Additionally, our sales staff based in the United States, Korea, Taiwan, Philippines, Indonesia, China, and Malaysia handle all customer enquiries locally. Manildra Group complies with all relevant applicable international laws and labour regulations in the countries our employees are domiciled, to ensure adherence with employment practices, remuneration, compensation, non-discrimination, workplace health and safety, respect for the environment, labour and human rights.

Manildra Group employees are covered by modern awards and enterprise agreements. All employees have freedom of choice to be a member of a union.

Employee rights are protected at Manildra Group through a suite of policies and procedures, recently reviewed and re-drafted to ensure compliance with relevant legislation and practices. Clear policies with measurable outcomes are key to ensuring all Manildra Group employees and associates are apprised of their local and global responsibilities toward mitigating the risk of any modern slavery practices inadvertently entering our operations.

Current policies include:

- *Modern Slavery Policy* (June 2023)
- *Human Rights Policy* (November 2022)
- *Code of Conduct and Ethics* (March 2024)
- *Equal Employment Opportunity and Gender Equality Policy* (May 2025)
- *Harassment and Bullying Free Workplace Policy* (May 2025)
- *Land Rights Policy*
- *Whistleblower Policy*

Human rights are part and parcel of Manildra's Group's sustainable success, through our seminal commitment to ethical business conduct. The conduct of our employees, associates, and suppliers throughout Manildra Group's vast supply chain, is paramount to our efforts to eliminate the risks of modern slavery – in both our Australian and our international sphere of operations.

Manildra Group continued to maintain confidential whistleblower reporting arrangements available to employees and broader stakeholders, supporting supply chain transparency and reporting of potential breaches of policy, ethical misconduct or human rights concerns.

No modern slavery-related grievances, whistleblower reports, allegations, complaints or remediation activities were identified during the reporting period.

MODERN SLAVERY POLICY AND TRAINING

Our *Modern Slavery Policy* has been established to commit our contribution toward eliminating all forms of modern slavery. Being implemented across our business, this policy supports the intent of international conventions, treaties, and protocols to combat modern slavery – including Australia's *Modern Slavery Act* (Cth) 2018.

This policy demonstrates our dedication to ensure our operations and supply chain are free of modern slavery risks, and a process of continuous improvement through our annual reporting in this *Modern Slavery Statement*. Outlining our approach to reducing the risk of modern slavery practices within our supply chains and operations, this policy underpins our expectation for a culture of ethical standards not limited to compliance with applicable laws, regulations, contracts, and other corporate and social responsibility obligations.

Manildra Group implements its human rights commitments through an established governance and assurance framework comprising its *Modern Slavery Policy*, *Human Rights Policy*, *Code of Conduct & Ethics* and *Bullying and Harassment Policy*.

The framework incorporates annual awareness training, risk-based supplier and labour-hire due diligence, confidential reporting mechanisms, investigation and remediation processes, recordkeeping, and ongoing monitoring.

During FY2025, Manildra Group continued to strengthen employee awareness of human rights, ethical conduct and modern slavery risks through participation in training programs aligned with SEDEX requirements. Employees at Manildra Flour Mill, Manildra Bakeries and Shoalhaven Starches completed annual training modules covering the ETI Base Code, Human Rights, Modern Slavery, and Bribery and Corruption. During the reporting period, 775 employees completed the training from a total eligible workforce of 832 employees across these sites. The training is reissued annually to support ongoing awareness, reinforce expectations regarding responsible business conduct, and assist employees to identify and report potential human rights or modern slavery concerns.

Training completion rates and participation in annual awareness programs form part of Manildra Group's approach to assessing the effectiveness of its modern slavery risk management framework.

Independent assurance, including SEDEX SMETA four-pillar audits, informs WHS, Human Resources and Industrial Relations governance, risk management and continuous improvement. Audit results during the reporting period identified no adverse change in the Group's assessed modern slavery or broader human rights risk profile.

HUMAN RIGHTS POLICY AND TRAINING

The establishment of Manildra Group's *Human Rights Policy* affirms our fundamental commitment to respect for individual dignity. We expect high standards of human rights performance within our operations and across our supply chain. Manildra Group values acting with integrity and courage and fosters an ethical culture in which everyone embraces shared responsibilities for maintaining the highest standards of personal and professional conduct.

Respecting human rights across all our business activities reflects Manildra Group's core values and vision of creating long-term, sustainable value for society. Supporting stronger rural communities as a world-leading manufacturer of Australian grown-and-made food and industrial products through local employment and procurement.

Manildra Group remains committed to what matters on the ground when working closely with our stakeholders to identify, understand and mitigate our negative impacts and optimise positive outcomes. Our approach is inclusive of the internationally recognised human rights protocols.

Our Human Rights in the Workforce training outlines employee rights and responsibilities embedded into core business practices, to protect and promote respect for individual dignity and equal opportunity.



(*from left*) Shift Supervisor Ryan Mamo, Planning and Operations Coordinator Kylie Twomey, Packing Operator Chanice Banks, Shift Supervisor Sam Atkins, Packing Operator Keiran Brandon, Senior Supervisor Jordan Sharp, Packing and Logistics Manager Nathan Squires, Packing Superintendent Guy Moffatt, and Project Manager Dyllan Ware at the newly completed Northern Packing Hub

RIGHT TO WORK ASSURANCE

Manildra Group has prioritised the work rights check framework for new employees in Australia. When employing a new staff member, part of our responsibilities include understanding and following rules for every individual's working right in Australia. These include a range of visa restrictions, sponsorship types, and general rights to live and work, and conditions such as working hours per week, length of contracts and even location restrictions.

Manildra Group is obligated to validate a legal right to work in Australia for all staff (employees and contractors – not third-party services engaged externally). Upon recruitment, we ensure compliance by maintaining accurate records, performing right-to-work checks by sighting relevant documentation and – for non-citizens – a Visa Entitlement Verification Online (VEVO) check at reasonable intervals during employment.



THIRD-PARTY LABOUR HIRE

Manildra Group continued to assess Contract Labour Hire Providers (CLHP) including the conduct of labour hire provider audits at selected sites, against expectations regarding employment compliance, remuneration, record keeping and right-to-work verification processes.

EMPLOYEE CODE OF CONDUCT AND ETHICS

Manildra Group's *Code of Conduct and Ethics* is a comprehensive document to provide all our employees and associates with clear and unambiguous guidelines to follow. This Code forms part of pillar requirements under our SEDEX Members Ethical Trade Audit (SMETA) obligations – namely:

- Labour standards;
- Health and safety;
- Management systems;
- Environmental sustainability; and
- Ethical business practices.

The above pillars are anchored by a suite of complementary policies that encompass equal opportunity, discrimination, harassment, corruption, bribery, conflicts of interest, and professional and personal conduct.

The standards we hold for our employees are detailed in our *Code of Conduct and Ethics*, applicable to all individuals employed, appointed, or otherwise attached to the Manildra Group of Companies, whenever and wherever they represent Manildra Group. Employees of a firm or a company contracted to perform work on behalf of Manildra Group, are also subject to the Code.

The principles underpinning this Code are an ethical culture, equal opportunity, anti-discrimination or harassment, anti-corruption or bribery, conflicts of interest management, and personal and professional standards of behaviour.

Manildra Group has always made clear that our employees must adhere to the practices and principles set out in this Code. In turn, Manildra Group:

- Works to establish safe and healthy workplace environments;
- Values diversity and considers it integral to our operations;
- Complies with all the applicable workplace laws including equal employment opportunities, wages and benefits; and
- Respects freedom and human rights through appropriate non-discriminatory opportunities

Manildra Group has zero tolerance for child slave labour, as detailed in our *Recruitment Policy* and *Modern Slavery Policy*.

Inside one of the site's world-class flour mills with the Shoalhaven Starches flour milling team including (*from left*) Shoalhaven Starches Head Flour Miller Guillermo Riviere, Shoalhaven Starches Mill and Pellet Mill Supervisor Terry Cain, Shoalhaven Starches Technical Specialist (Milling) Gunther Klenke, and Shoalhaven Starches Flour Miller Dray Sermonia // PHOTO: PETER IZZARD

OUR COMMUNITIES

Manildra Foundation was established to support the communities in which we operate and beyond. Making a long-term positive difference is important to our family business, and we remain proud of our partnerships with trusted organisations who – like us – want the best for our shared communities by working together.

In collaboration between Manildra Foundation and the following not-for-profit organisations, we dedicate significant time and resources to strengthening these partnerships and our shared commitment to outcomes.

AUSTRALIAN RED CROSS

A mission to reduce and prevent human suffering, the Red Cross is the world's largest humanitarian movement, with 17 million volunteers globally in almost 200 countries.

THE SALVATION ARMY

Providing services as wide-ranging and diverse as the areas of need in our communities, from children to the aged, the internationally renowned organisation established in 1865 in London, arrived in Australia around 1880.

FOODBANK

Established in New South Wales in 1992, the pantry source for charities and community groups in every state and territory has distribution centres in all capital cities and a number of regional centres, to provide more than 60 million meals in 2022 as a conduit between food industry surplus and welfare sector need.

THE SMITH FAMILY

For more than a century, Australia's largest education-related charity has helped children participate fully as students for their best chance at breaking the cycle of disadvantage, with learning support and mentoring programs to fit in at school, keep up with peers, and build aspirations for a better future for themselves.

SYDNEY CHILDREN'S HOSPITAL FOUNDATION

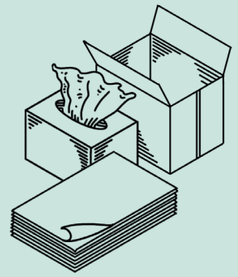
Contributing more than $500 million since 1986 to priority needs (including medical, nursing and allied health specialists, high-tech equipment, ground-breaking research, and ward refurbishments and new buildings), and funding for Child Life, Music Therapy, and Art Program activities and exhibitions to create a vibrant healing environment.

BREAST CANCER NETWORK AUSTRALIA

Working since 1998 to ensure impacted Australians receive the very best support, information, treatment, and care appropriate to individual needs.



Children play in the Montana Park fitness and play precinct built by Manildra Group in the township of Manildra, New South Wales / / PHOTO: PIP FARQUHARSON



PAPER AND PACKAGING
- Paper and pulp • Fine paper
- Paper packaging and sacks
- Corrugated cardboard
- Boxes



FOOD AND BAKERY
- Sweet and savoury baked goods
- Pastas • Soups
- Tortillas • Pizzas • Noodles
- Confectionery
- Ice-cream and dairy products
- Meat and dairy extender or substitute
- Plant-based products



PHARMACEUTICALS
- Sanitisers and sprays
- Medicines and tablets
- Hairspray and other personal care products



INDUSTRIAL
- Solvents • Detergents
- Coatings and lacquers
- Adhesives
- Printing inks • Fire suppression

MANILDRA GROUP INDUSTRIES WE SUPPLY



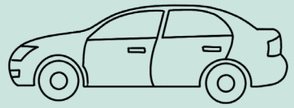
BEVERAGE
- Alcoholic spirits and ready-to-drink brands
- Protein shakes
- Performance drinks
- Carbonated drinks
- Brewing



ANIMAL FEED
- Livestock
- Equine
- Aquaculture
- Pets



MINING AND CONSTRUCTION
- Bricks
- Plasterboard
- Cement
- Water clarifying and settling agent



TRANSORT FUELS
- E10 and E85 petrol

OUR SUPPLY CHAIN

Since 1952, our 100 per cent family-owned Australian business has remained committed to Australia-grown-and-made products across the entire supply chain, working with a far-reaching and diverse value chain of stakeholders including suppliers at home and abroad. Products imported are minimal and immaterial in relation to Manildra Group's core business of sustainable value-adding to Australian agriculture and regional manufacturing industries.

The principal raw material used in our processes, wheat is purchased in Australia from more than 2000 farmers across New South Wales, Victoria and Queensland. Sugar is purchased from more than 500 farmers in northern New South Wales, and canola from more than 1000 farmers mostly in New South Wales. Other raw materials used by Manildra Group include dairy products and other oils and agricultural products.

In turn we supply farmers our nutritious feeds for livestock and aquaculture. We also produce and use substantive amounts of energy, paper and corrugated cardboard, plastic, metal packaging materials and operating supplies.

These inputs for our Australian operations are purchased largely from local suppliers and acquired locally by our North American operations. Downstream, our global customer base includes industrial manufacturers, independent bakeries, food service businesses, beverage manufacturers and brewers, mining and oil companies, pharmaceutical companies, retailers and brands and exporters.

The majority of Manildra Group's primary agricultural inputs continue to be sourced from Australian farming communities, reducing exposure to higher-risk international supply chains. We manufacture and distribute products directly from our world-class facilities to warehouses and customers throughout Australia and internationally. During FY2024, Manildra Group exported products to customers across a broad range of international markets through established global distribution networks.

Our commitment to Australian-made products remains central to our business. Where products or ingredients are not available in adequate domestic supply, Manildra Group assesses and manages any associated modern slavery risks through our supplier due diligence and responsible sourcing process.

MANAGING SUPPLY CHAIN RISKS

Manildra Group is committed to maintaining responsible and ethical business practices throughout its supply chain and expects suppliers to uphold standards consistent with our values and policies relating to human rights, ethical conduct and modern slavery.

To support the identification and management of modern slavery risks, Manildra Group continued during FY2025 to:

- request and review modern slavery statements from suppliers that are subject to reporting obligations;
- require new suppliers to complete a Responsible Business Practices Questionnaire as part of the supplier onboarding and approval process;
- apply a risk-based approach to supplier due diligence and procurement activities;
- maintain participation in the Supplier Ethical Data Exchange (SEDEX) program;
- undertake SMETA assurance activities at accredited Manildra Group sites;
- require suppliers to acknowledge supplier terms and conditions that include commitments relating to human rights, dignity, respect and ethical conduct; and
- engage with suppliers and customers on responsible sourcing and sustainability expectations.

Manildra Group's approach to responsible sourcing is further supported through a range of governance frameworks and policies, including its *Modern Slavery Policy*, *Human Rights Policy*, *Code of Conduct and Ethics Policy* and *Third-Party Due Diligence Procedure*. These frameworks establish expectations for ethical conduct and assist in identifying, assessing and addressing potential modern slavery risks within our operations and supply chain.

No material changes were identified in the overall modern slavery risk profile of Manildra Group's supply chain during the reporting period. No actual instances of modern slavery were identified within the Group's operations.

SOURCING OUR INGREDIENTS

Since the start of our family business in 1952, Manildra Group has remained committed to putting Australia first and sourcing ingredients that are Australian-grown-and-made. Most of our raw products are sourced directly from farmers in Australia, and materials we source externally are immaterial and minimal to our core manufacturing operations.

Where ingredients required are not in adequate supply in Australia, we implement a range of procedures and practices to ensure we mitigate recognised risks of some raw ingredients – particularly when imported – for a higher likelihood of modern slavery, with country of origin or historical production practices.



Aerial view of Manildra Group's Grong Grong grain storage site // PHOTO: RACHAEL LENEHAN

WHEAT

As Manildra Group's major input and biggest cost, our wheat is purchased locally from Australian farming families and grain traders. To produce our 100 per cent Australian-grown, owned and made premium products, Manildra Group proudly maintains personal partnerships with more than 2000 wheat farmers. Together, we ensure our premium products are sustainably produced to the best-practice standards, from the highest-quality wheat.

Blessed with rich natural assets, Australian farmers are renowned for ranking among the world's most-sustainable production practices and highest food safety standards. From the wheatbelt heartland of New South Wales, we work hand-in-glove with farmers to add value to Australian agriculture and share the finest from our nation with the world.

We know joint commitments to ethical conduct and integrity bind our longstanding and trusted business relationships with farmers. By engaging in thorough due diligence before doing business with farmers for the past seven decades – including regular site visits by Manildra Group's team of grain-buyers – we understand how Australian farmers provide safe and healthy working conditions and foster inclusive workplaces free of discrimination and harassment.

The longevity of our strong farming relationships – some for many decades – provides us valuable insight into potential risks within our agricultural supply chain. To support assurance throughout our downstream supply chain that our wheat source is produced in a sustainable way that meets community and customer expectations, the International Sustainability and Carbon Certification (ISCC) scheme has been adopted by Sustainable Grain Australia. While Manildra Group does not collect or maintain data regarding the extent of ISCC participation across its wheat supplier base, the scheme remains an important industry framework supporting sustainable production practices and consideration of environmental, social and governance factors.

Affirming industry's commitment to the environmentally, socially and economically sustainable production of grains, ISCC principle 4 requires compliance with human, labour, and land rights. Mandatory ISCC certification for the European Union as the world's biggest canola market – including Australian grain imported for more than a decade – encompasses the entire farm for mixed cropping (including wheat) in New South Wales. More than 5000 growers made ISCC declarations last year, usually conducted via their National Grower Registration card at point of delivery, to comply with the six ISCC pillars of sustainability:

- Protection of biodiversity and carbon-rich environments
- Adherence to good agricultural practices
- Assurance of safe working conditions
- Protection of human and labour rights
- Compliance with applicable laws and international treaties
- Good business management and continuous improvement



Manildra Group has maintained strong partnerships with local wheat farmers, providing a reliable source of wheat to our flagship Manildra Flour Mill in NSW



Australia's largest grain industry, wheat is grown across our 'golden crescent' of northern, southern and eastern NSW



Australian wheat farmers grow about 25 million tonnes annually, worth about 3% of overall output and 10% of exports globally

Aerial view of wheat harvest in central west New South Wales // PHOTO: CHRIS WATSON

SUGARCANE

Our Sunshine Sugar partnership between local farmers from the grower-owned New South Wales Sugar Milling Co-operative and family-owned Manildra Group, is the only 100 per cent Australian producer of raw and refined sugar products. We own and operate sugar mills in regional Harwood, Broadwater and Condong; and a refinery co-located at Harwood. For more than 150 years, sugar production has been a major industry in the northern rivers' Clarence, Richmond and Tweed valley region of New South Wales, where Harwood is home to Australia's longest-running sugar mill since 1874.

Sunshine Sugar is the retail name for the New South Wales sugar industry, and Manildra Group only purchases sugar through this partnership. This industry supports more than 500 farming families over a 34,000-hectare footprint, growing up to 2.4 million tonnes of cane to produce 275,000 tonnes of raw sugar annually.

Ensuring our sugar production is thriving, sustainable and responsible, Sunshine Sugar is proudly certified to international Bonsucro standards to promote sustainable sugarcane production, processing and trade for one of the world's most important crops. Bonsucro supports more than 250 members from 50 countries in all elements of the sugarcane supply chain – from farmers to millers, traders, buyers and support organisation.

Bonsucro is a member of the International Social and Environmental Accreditation and Labelling Alliance (ISEAL) in full compliance with the ISEAL *Code of Good Practice* framework for world-leading sustainability standards. Bonsucro's *Production Standard* and *Chain of Custody Standard* to achieve sustainability in sugarcane and derived products, emphasise respect for human rights and labour standards.

Manildra Group is further committed to complying with the Bonsucro *Code of Conduct*, in line with the United Nations *Guiding Principles on Business and Human Rights* and the *OECD Guidelines for Multinational Enterprises*. Bonsucro certification also draws on the *OECD-FAO Guidance for Responsible Agricultural Supply Chains* as globally agreed frameworks important to Bonsucro members working along the sugarcane supply chain.



To world-leading environmental standards and using the best soil and water resources in the NSW northern rivers region, 500 farmers grow 2.4 million tonnes a year of cane over 34,000 hectares



The world's first sugar manufacturer certified to global environmental and social sustainability standards, Manildra Group's partnership with the farmer-owned NSW Sugar Milling Co-operative at Harwood, is home to Australia's oldest continuously operating sugar mill



Manildra Harwood Sugars operates mills at Condong and Broadwater, and a state-of-the-art refinery with our Harwood mill, as the only 100% Australian producer of raw and refined Sunshine Sugar

Aerial view of lush sugarcane fields in northern New South Wales // PHOTO: CHRIS WATSON

CANOLA

We transform non-genetically modified canola seed purchased directly from more than 1000 Australian farmers, into our value-added oil, meal and stockfeed products at our fully integrated oilseed crushing, refining, packaging and stockfeed manufacturing operation in Manildra, New South Wales.

Operated in a joint venture under the International Sustainability and Carbon Certification (ISCC) scheme in Australia, the ISCC framework ensures the sustainable production of raw materials that meets or exceeds community expectations – as outlined in the wheat section of this Statement.



The family-owned Mac Smith and Manildra Group MSM Milling specialises in oilseed crushing refining and packaging of canola and high-oleic oils at our world-class manufacturing facility in central west NSW



Canola seeds sown by NSW growers in winter become spring fields of yellow flowers that from pods of black seeds at 43% oil, to be naturally expeller-pressed in our fully integrated, sustainable manufacturing process



With the lowest saturated fat of any vegetable oil and half that of olive oil, our premium 100 per cent Australian-owned, grown and made canola oil is also rich in Vitamin E, Omega-3 and fatty acids to help maintain heart health

Golden fields of canola in the heart of central west New South Wales // PHOTO: CHRIS WATSON

PALM OIL

Recognising that palm oil may have significant impacts on workers, communities, and the environment, Manildra Group was among Australian pioneers in sourcing sustainable palm oil, joining the Roundtable on Sustainable Palm Oil (RSPO) standards in 2011and obtaining RSPO certification in 2014. RSPO certification ensures any palm oil we use is produced in a manner that promotes environmental protection, wildlife conservation, human rights, and social benefits through the supply chain.

Certified Sustainable Palm Oil (CSPO) must comply with RSPO environmental and social criteria applied to minimise negative impacts of cultivation on environments and communities in palm oil-producing regions. To implement global standards for sustainable palm oil production, RSPO unites industry stakeholders across seven sectors – palm oil producers, processors and traders, consumer goods manufacturers, retailers, banks or other investors, and environmental or social non-government organisations.

All Manildra Group shortenings and margarine products made with palm and kernel oil are certified to international RSPO or Malaysian Sustainable Palm Oil Certification (MSPO) standards. Manildra Group is committed to sourcing certified sustainable palm and kernel products wherever available and continues to support recognised RSPO traceability models, including Segregated (SG) and Mass Balance (MB) certification. With full records supporting transparency throughout the supply chain, every batch of shortening and margarine sold by Manildra Group can be individually traced back through the supply chain to its source.

Importantly, the RSPO Human Rights Working Group, formed in 2014, oversees the successful implementation of RSPO *Principles and Criteria* in standards; and provides tools to support further implementation of the United Nations *Guiding Principles on Business and Human Rights– Protect, Respect and Remedy Framework*.

COCOA

Manildra Group is committed to protecting the rights of people, to raise awareness of any potential modern slavery issues, and improve the working conditions of international cocoa farmers. We import cocoa from a third party with UTZ certification (now part of the Rainforest Alliance) to show consumers that products have been sourced in a sustainable manner, from the farm and through production.

To become certified, suppliers must adhere to the Sustainable Agriculture Standard to drive more resilient and inclusive agricultural production and responsible supply chains, through an assess-and-address approach to risks of human rights violations such as child and forced labour, discrimination, and workplace violence and harassment.

An array of freshly baked treats made all the sweeter with a range of Manildra Group's value-adding, premium Australian ingredients // PHOTO: SUPPLIED

EFFICACY OF ACTIONS AND FORWARD VIEW

Manildra Group's commitment to respect for human rights, including the elimination of modern slavery globally, is underpinned by our strong policies and procedures – certified to international standards –to identify and manage risks of human rights violations and specific modern slavery risks within our supply chain. We recognise this as an ongoing process required for continuous improvement.

Manildra Group assesses the effectiveness of its approach to identifying and mitigating modern slavery risks through a range of activities, including:

- supplier due diligence and onboarding processes;
- Responsible Business Practices Questionnaires completed by suppliers;
- participation in SEDEX and SMETA assurance activities;
- employee training and awareness activities;
- periodic review of policies and procedures relating to human rights, ethical conduct and modern slavery;
- employee grievance and whistleblower reporting mechanisms;
- supplier engagement activities; and
- ongoing assessment of modern slavery risks within our operations and supply chains.

During the reporting period:

- no actual or suspected incidents of modern slavery were identified within Manildra Group's operations;
- no modern slavery-related complaints or grievances were received;
- no whistleblower reports relating to forced labour, human trafficking or worker exploitation were reported; and
- Manildra Group continued to deliver SEDEX training modules covering human rights, ethical trade, modern slavery, and bribery and corruption to employees at relevant operational sites.

The organisation's modern slavery risk assessment remained current during FY2025 and continued to identify a low overall modern slavery risk profile across Manildra Group's operations and supply chains. No new modern slavery risks, geographic risk changes, industry-specific risk changes or high-risk supplier categories were identified during the reporting period.

LOOKING FORWARD

While no material changes were identified in the overall modern slavery risk profile of the organisation during FY2025, Manildra Group remains committed to strengthening its approach to identifying, assessing and addressing modern slavery risks through ongoing review, stakeholder engagement and continuous improvement.

In the coming reporting period, Manildra Group intends to:

- continue supplier engagement regarding human rights and modern slavery risks;
- maintain the Responsible Business Practices Questionnaire and supplier due diligence processes;
- continue participation in SEDEX and SMETA assurance programs;
- continue employee awareness and training activities relating to ethical conduct, human rights and modern slavery;
- review and maintain governance frameworks and policies supporting responsible business conduct;
- monitor the effectiveness of grievance and whistleblower reporting mechanisms;
- continue annual assessment of modern slavery risks across operations and supply chains; and
- maintain transparent reporting of its approach to identifying, assessing and addressing modern slavery risks through future Modern Slavery Statements and sustainability reporting.

CONSULTATION AND APPROVAL

In preparing this Statement, relevant business functions were consulted to confirm the position during the FY2025 reporting period. This Statement was reviewed and approved by the Board of Directors of the GOTW Pty Ltd on behalf of Manildra Group pursuant to section 13 of the *Modern Slavery Act* 2018 (Cth).

This statement was approved
by the board of Manildra Group
on 8th September 2026

John Honan
Managing Director
MANILDRA GROUP

At Manildra Group's world-class Shoalhaven Starches site in Nowra, New South Wales, our zero-waste manufacturing processes extract value from 100 per cent of the wheat grain for a diverse range of premium Australian products // PHOTO: DEAN HOLLAND

MANILDRA GROUP
100% AUSTRALIAN OWNED

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