

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.

MESSAGE FROM THE MANAGING DIRECTOR

Dear Stakeholders,

The 2023 financial year has been very challenging as businesses and communities around the world continued to struggle with the effects of Covid-19. The team at ABFH and that of our suppliers based in Australia and overseas have had to carefully manage through labour shortages, freight disruptions, shortages in supplies, and the rapidly changing Government mandates on Covid-19 health and safety.

The past financial year has reminded us that people are the core of our business. They are our team members, suppliers, customers and the general workforce of our supply chains. The challenges we faced in the past year emphasized the need for us to work together with our suppliers and customers alike to create healthy and safe working environments that are free from prejudice, and to commit ourselves to uphold and respect every individual's universal human rights.

In ABFH, it is an integral part of our culture to respect the human rights of all our employees including that of all the workers employed in all aspects of our supply chains. In 2023, we consciously endeavoured to the best of our abilities to integrate human rights into the way we undertake our daily business affairs and in the decisions that we make.

As one Australia's leading national food manufacturers, ABFH is committed to excellence in all that we do - from the quality of food we manufacture and deliver to our relationships with our employees, suppliers, customers and shareholders. We achieved all these through the highest standards in the quality of our products and services, and the utmost respect of our people.

The Board and Management of ABFH are committed to ensure that initiatives for continuous improvements are in place to be able to develop an effective compliance framework to demonstrate our full support for the Modern Slavery Act of 2018.

This Modern Slavery Statement was approved by the Board of Directors of the Australian British Food Holdings Pty Ltd.



Mark Rintoul
Managing Director
Australian British Food Holdings



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 2022 to 30 June 2023. This statement has not been formally lodged.

Introduction

This is ABFH's 2nd Modern Slavery Statement which outlines the undertakings we have made to identify, manage and mitigate modern slavery risks within our business group and that of our supply chains.

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 2023, initiatives were put in place to assess potential risks within ABFH's operations and supply chains.

As locally based in Australia, ABFH's operations are highly regulated within auditable compliance environment (for example, in respect of prescribed pay rates, working conditions, and safe systems of work), the company's operations and finished goods supply chain represents a low level of modern slavery risk.

Similarly, where our operations are supplemented by contract labour and services, such arrangements are formed with established and highly reputable local suppliers with comparable risk profiles.



Majority of ABFH's supplies are sourced within Australia, the United Kingdom and Denmark, countries that have lower risk of experiencing modern slavery practices as per the Global Slavery Index (GSI). However, there may be a small number of supplies which our Australian agents are importing from countries in Asia that fall within a slightly elevated modern slavery risk category. While geography is only one factor used in assessing the overall risk profile of suppliers, this is an important starting point for ABFH to understand the level of risks and identify the appropriate mitigation strategies.

Actions to address Modern Slavery Risks

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="radio"/>	Ethical Employment Policy
<input type="radio"/>	Employee Code of Conduct
<input type="radio"/>	Equal Employment Opportunity, Harassment and Workplace Bullying Policy
<input type="radio"/>	Whistle Blower Policy
<input type="radio"/>	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 continues to use this platform and associated independent tools to help assess our supplier performance. The company’s goal is for all high-risk suppliers to be registered with the SEDEX platform. Where the company becomes aware of ethical issues within our supply chain, we seek to engage with our suppliers directly.

It is the company’s preference to work with suppliers to resolve or mitigate issues and where concerns are confirmed, we look for a clear roadmap for positive resolution including implementation of a corrective action plan within a defined period, and verification of completion. Where suppliers fail to adequately engage or take the necessary steps to remedy the issues identified, we will escalate the issue and take further actions including termination of the business relationship if required.

ABFH continues to subscribe to regular onsite external audits against the SMETA’s (SEDEX Members Ethical Trade Audit) 4-Pillars which encompasses labour standards, health and safety, business ethics and environmental assessment.

We take pride in our involvement in local communities throughout Australia, and we strive to support those most vulnerable and in need. We continue to regularly donate products to local and national organisations for the homeless. This includes providing for organisations such as Second Bite.



Assessing the Effectiveness of our Actions

During this reporting period, our focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains.

We are in the 2nd year of the implementation of the Modern Slavery Act of 2018, and we recognise that our review and assessment process have its limitations to identify and address our modern slavery risks within our operations and across our supply chains.

Appointment of Key Roles: To demonstrate our commitment to pursue continuous improvements in the review and assessment process, in 2023 we have undertaken a review of ABFH's organisational structure and implemented changes that would allow us to better manage and address modern slavery risks.

- We created a new role and appointed a Chief Operations Officer who will monitor and ensure the effectiveness of our actions to remove the risk of modern slavery from our operations.
- The company also appointed a General Manager of Procurement and Engineering who will monitor and ensure the effectiveness of our actions to remove the risk of modern slavery from our supply chains.

Awareness and capacity building: We integrated a Modern Slavery component into the National Conference, reinforcing the company's position on modern slavery and the action plan. This provides key employees with a foundation and understanding of the topic.

Supplier engagement: Commenced engagements with key suppliers to gather information regarding their modern slavery risks and their mitigation activities.

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 is committed to continuous improvement around modern slavery therefore several actions are being planned to be conducted over the next reporting period.

Our action plan includes the following:

- Awareness and capacity building for team members on modern slavery risks and issues. This includes integrating modern slavery information drive in the agenda of the company's Annual National Conference.
- Team members who deal with our suppliers will be required to complete a training program that will cover modern slavery and ethical sourcing.
- Continue to engage with key suppliers to gain greater transparency of modern slavery risks and their mitigation activities.
- Distributing ABFH's Supplier Code of Conduct & Ethical Standards to our suppliers and obtaining a signed declaration from suppliers acknowledging our standard.
- Ensuring that new agreements or contracts executed by ABFH include clauses on modern slavery.
- Assessing improvements to existing supplier assurance processes.

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 Holdings

