



MODERN SLAVERY REPORT



2022



Monde Nissin Australia

CONTENTS:

1. CEO Message
 2. Company Introduction
 3. Company Structure, Operations and Supply Chain
 4. Modern Slavery Risk Assessment
 5. Actions taken to Control Risks Identified
 6. Assessment of Effectiveness
 7. Consultation
 8. Future Planning
- Appendix - Compliance with the Act
-

CEO MESSAGE

Our purpose of being “Simply Good for People and Planet” is ingrained within our culture and we are committed to ensuring human rights and fair labour practices are upheld within our business and within our supply chain. In 2022 we launched our Sustainability Strategy (2022 - 2025) and Goodness Framework to deliver on our Purpose. This framework has three pillars; Good for People, Good for Plant, and Good for Partnerships. Our 'Fair' Human Rights and Modern Slavery program are aligns to the 'Good for People' pillar.

In 2021 we focused on the understanding our baseline data, analysis and developing clear initiatives that will be the basis for our modern slavery program into the future. This set us on a clear path in 2022 to establish a clear set of expectations for human rights, focusing initially on our internal policies and procedures, a cross functional working group, training for our people, and piloting due diligence tools with several key suppliers.

Moving forward, we will focus on embedding delivery against these policies and procedure internally, and prioritising supply chain due diligence work based on our procurement risk areas, and remediating negative impacts where these are identified.

We fully support the Modern Slavery Act and associated mandatory reporting and are proud to share our third Modern Slavery Statement, which reflects the work undertaken to manage and mitigate risks of modern slavery in our operations and supply chain.

The Monde Nissin Australia Board of Directors and Executive Leadership team approves this statement, our Modern Slavery 2022 report, and I sign on their behalf.



Hadrianus Setiawan
Chief Executive Officer
Monde Nissin Australia

Statement on the reporting entity Monde Nissin Australia (ABN: 25 169 518 325) is an Australian private company. The company is registered at Level 3 / 6 Nexus Crt, Mulgrave VIC, Australia. This Statement has been published in accordance with the Modern Slavery Act 2018 (Cth) (MSA or Act). It identifies the steps Monde Nissin Australia undertook during year ending 30 December 2022.

COMPANY INTRODUCTION

Monde Nissin Australia (MNA) sources, manufactures, stores and distributes some of Australia's most loved brands, including Nudie, Black Swan, Wattle Valley, Peckish and Quorn. We understand the importance of corporate social responsibility and human rights and work together to ensure our vision of:

'Simply Good for People and Planet'

Is reflected in activities we undertake as well as across our operations and supply chain.

Our company values reflect our belief in the rights of all individuals to have fair and just working conditions:

Care; Teamwork; Excellence; Fun



Care

We are passionate about the work we do, and act with integrity and honesty. We value and support each other with empathy and genuine respect, creating a workplace that is mentally and physically safe.



Teamwork

We respect and acknowledge all team members ideas and always have each others backs. We communicate openly, aligned to achieve our common goals, celebrating wins along the way.



Excellence

We plan for success through considered and balanced decision making. We operate with discipline, attention to detail and agility and have the courage to speak up to understand the WHY.



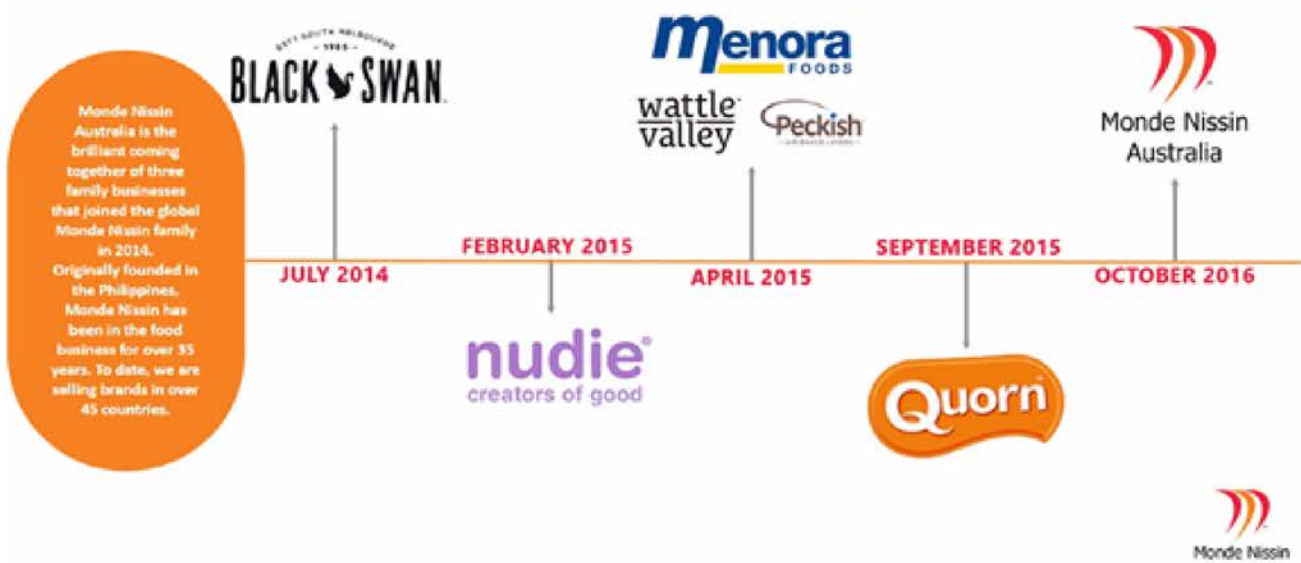
Fun

We recognise each others wins, big or small and celebrate with our colleagues. We have a laugh and don't take ourselves too seriously or worry about things we can't control.

Company STRUCTURE

Monde Nissin Australia Pty Ltd (ABN 25 169 518 325) is an Australian Private Company that has been operating since 2014. We currently employ 349 individuals across VIC, NSW, WA & QLD, with the majority of employees in VIC and NSW.

OUR BUSINESS HISTORY



The following business units make up Monde Nissin Australia:

- Black Swan
- Nudie Foods
- Menora
- Supply Chain and Logistics (Monde Nissin 3PL)
- Food Solutions and Strategic Projects

These business units are supported by a shared service departments that includes the functions of finance, people & culture and business excellence (safety, quality and sustainability).

In October 2022 we closed the Novus Manufacturing operational site and business unit.

COMPANY OPERATIONS AND SUPPLY CHAIN

OPERATIONS

Monde Nissin Australia core operations consist of procurement of both raw materials and retail food products, food processing and production, food storage and distribution. Currently our retail products are distributed domestically and into 15 international markets. Other core operations include the employment of 348 employees across the business.

Monde Nissin Australia Head Office:

- Mulgrave Victoria

Production Sites

- Clayton South, Victoria – Black Swan
- Cheltenham, Victoria – Novus Manufacturing (closed Oct 2022)
- Eastgardens, New South Wales – Nudie

Warehousing and Distribution Sites

- Noble Park, Victoria
- Smithfield, New South Wales
- Perth Airport, Western Australia

SUPPLY CHAIN

The Monde Nissin Supply Chain includes the procurement of raw materials, finished products and services.

We source a wide range of raw materials, the majority of which are procured from domestic suppliers. These include:

- Fruit Juices
- Fruit, nuts, vegetables and spices
- Dairy product, including Australian Cream Cheese and Milk Powders
- Primary and Secondary packaging materials

We also procure finished retail product from both domestic and international (East and South East Asia; UK and European Union) suppliers, including:

- Rice Crackers
- Meat Replacement Products
- Dairy products, including butter, cheese and dairy based deserts
- Condiments, including tea, mustards, sauces and jams

The services we procure are mainly domestic and include for example:

- Domestic and International logistics and transport services
- Laboratory testing services
- Cleaning services
- Professional service consultants, such as legal services and marketing specialists
- Trades and maintenance services

For all materials and services sourced, our procurement team, in consultation with subject matter experts within the business, ensure safe, quality and continuous supply from reputable companies.

Modern slavery risk assessment

During this reporting period we reviewed the risk assessment of modern slavery risk that was initially undertaken in 2021. We still acknowledge that the risks of modern slavery may be heightened in some of our procurement categories and supply chain operations as a result of the source of materials used in products supplied to us and the geographical location of some suppliers. Labour conditions was a key supply chain risk identified across many of the procurement categories as we have low visibility of local and overseas contracted and subcontracted business-related services and professional services, agricultural supply chains and packaging.

We deemed modern slavery risks as low for our direct employees. This means that we have direct visibility of employment terms and conditions, which are set out in either contracts of employment that are regulated by Australian employment laws and relevant industrial instruments. However we identified in our risk assessment review that we could not address the modern slavery supply chain risks without a strong internal governance framework, and training for our people in relation to human rights and modern slavery. This is where we focused our action during this reporting period.

KEY SUPPLY CHAIN RISKS



Labour rights and low visibility in local and overseas contracted and subcontracted business-related services and professional services, such as transport and logistics, packaging and advertising and marketing.



Labour conditions in the cultivation, harvesting and processing of food products



Labour conditions and child labour in the overseas supply chain of materials such as paper and plastic.

ACTIONS TAKEN TO CONTROL IDENTIFIED RISKS

DIRECT

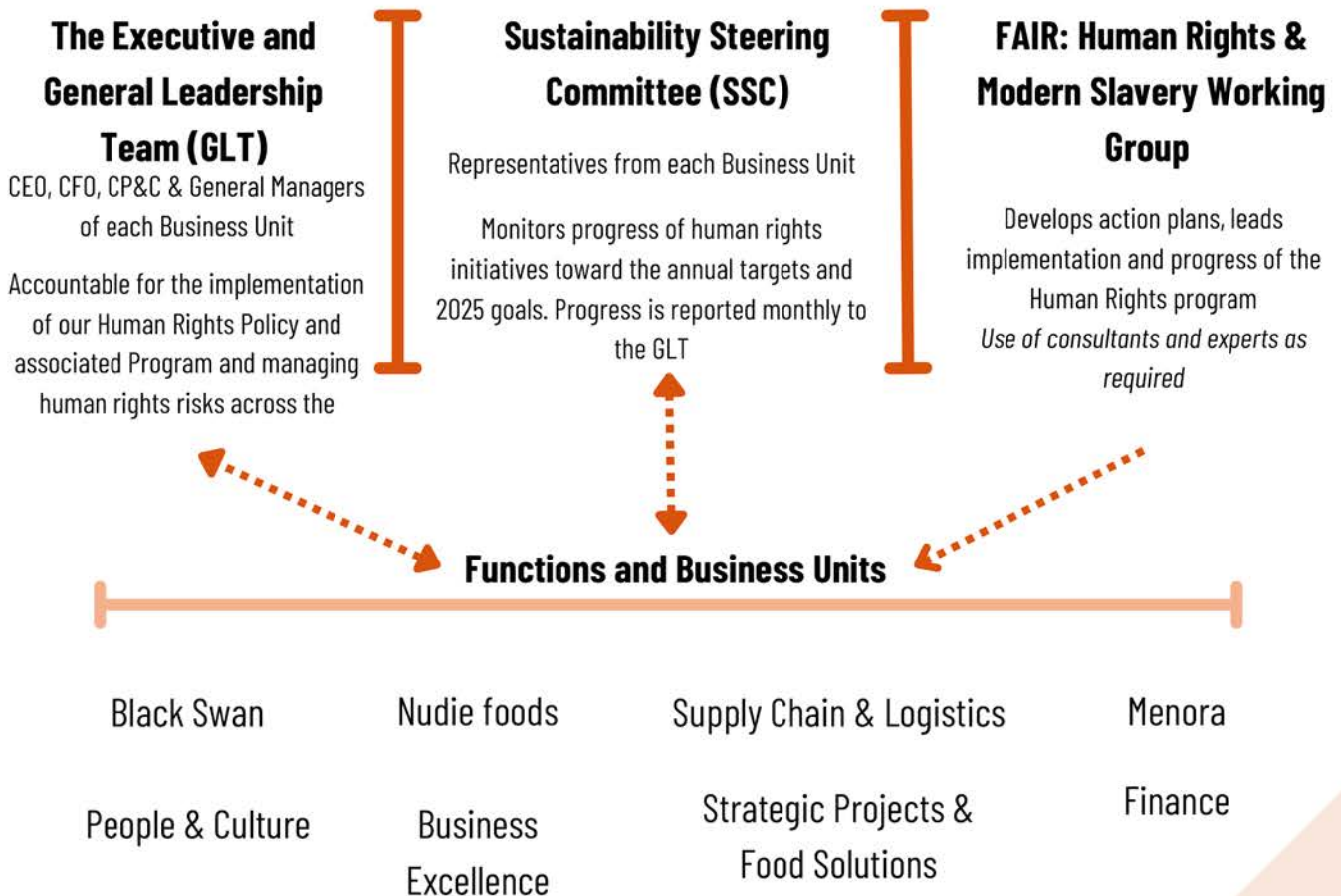
This reporting period is the first year launching of our Sustainability Strategy (2022–2025). The Human Rights and Anti-Modern Slavery program falls under the GOOD FOR US strategic pillar and FAIR initiative.

In order to commence lead action including the development of annual plans and monitoring of actions across the sustainability initiatives, the Sustainability Steering Committee was established in January 2022, supported by specialised cross functional working groups for key initiatives within the strategy. The Human Rights and Modern Slavery is the 'FAIR' initiative. The Modern Slavery Working Group was established to develop, lead and monitor the implementation of the modern slavery annual action plan under FAIR.

The broader sustainability strategy, where the FAIR: Human Rights and modern slavery program sits, is managed under the following reporting framework.

Monde Nissin Australia Board

Responsible for reviewing, appraising and approving the Sustainability Strategy (2022 -2025), which includes human rights and our annual Modern Slavery Statement and policy commitment



ACTIONS TAKEN TO CONTROL IDENTIFIED RISKS

DIRECT

The working group focused on the development of a year 1 action plan to get us towards our object that supply chain workers are visible and protected and Monde Nissin Australia is a force for good in the food system. The priority for the year was to clearly document our human rights expectations consistent with international and Australian principles and laws. This provides greater understanding within our business of human rights, and then to communicate this internally to our people. Using SEDEX self-assessment tool we also reviewed our internal governance framework and identified some improvement areas. Our second priority was to pilot our due diligence process with several strategic suppliers to commence controlling risk across our supplier base.

The actions taken by the working group, utilising a consultancy firm, within the period were:

- development of the Human Rights Policy,
- development of a Supplier Code of Conduct
- specific human rights and modern slavery clauses in new contracts
- a due diligence framework tool

The Human Rights Policy was approved by the Board in Q2. This policy is publicly available on our external website and internal intranet.

We will continue to review and build our governance frameworks overtime as well as greater emphasis in embedding and integrating these within our practices and to our supply chain.

Policy / Resource	Purpose
Human Rights Policy	Communicates our commitment to the fundamental human rights of people within our operations and supply chain. Aligns to the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
Work Health Safety Policy	Outlines our commitment to the physical, psychological safety and health of our team members, contractors, visitors and other that may be impacted by our business operations
Anti Discrimination, Harassment & Bullying Policy	Outlines our commitment to value and respect the unique contributions of people with diverse backgrounds, and a zero tolerance of bullying and harassment behaviours.
Code of Conduct	Communicates how we expect team members to behave towards each other, in business dealings and the broader community. References details of our Integrity Hotline Policy.
Supplier Code of Conduct	Articulates the expectations for our suppliers in relation to human rights, child labour and modern slavery, anti-bribery and corruption
Integrity Hotline Policy	Details the grievance mechanisms available to workers including an independent and anonymous reporting channel for team members (including contractors) to raise serious matters they don't feel comfortable raising through other channels, including breaches of the law and/or conduct that breaches our Code of Conduct, Policies or other forms of unacceptable behaviours

DIRECT

Communicating our human rights expectations

Online Modern Slavery Act training and Modern Slavery awareness training commenced implementation with our people in 2022 to support the roll out of the Human Rights Policy. The training in the Act provides legislative knowledge to our leadership team, while the general awareness training informs people on what modern slavery is and how to report concerns.

Our policies are available on our intranet for employees. In addition we use noticeboards to communicate our independent grievance hotline. A Human Rights and Modern Slavery intranet page was also launched to provide further education to our employees on the aspects like the statistics of modern slavery globally and within Australia using information from Anti-Slavery Australia.

Furthermore, the implementation of policy commitments is supported by our People & Culture team and Business Excellence team, dedicated teams that provide specialised advice to team members on human resources, and sustainability and safety matters, respectively.

SUPPLY CHAIN

Our second focus area in this reporting period was to pilot our supplier due diligence framework with two strategic suppliers that were both in the agriculture procurement risk category. Strategic suppliers are defined in our due diligence framework where we have high spend and they fall into a high risk procurement category for modern slavery risks.

The modern slavery self assessment questions were incorporated into a broader supplier management pre-qualification pilot project. The chosen suppliers were required to acknowledge requirements as stated through the provision of our Human Rights Policy and Supplier Code of Conduct. A self-assessment questionnaire was then completed by the supplier on forced labour indicators.

The pilot has provided us an opportunity to review and get feedback from two of our larger suppliers. This was important because if our larger suppliers had difficulty in understanding the request, reasons for it and responding, then as we aim to expand this into our broader supplier base we know many of our suppliers are small businesses and do not have resourcing or understanding of modern slavery risk management processes. As a result we are reviewing the questionnaire to ensure the questions are clear. The pilot also provided us with important understanding on our own resourcing limitations on how we can manage information accurately track visibility in the supply chain. We will be reviewing options to address this in 2023.

ASSESSMENT OF EFFECTIVENESS OF CONTROL MEASURES

As we prioritise building our internal governance and awareness in 2022, we modified our annual measures of effectiveness accordingly.

Area of Action	Measures of effectiveness FY 22
Policy and governance	<ul style="list-style-type: none">• 137 completed HR policy acknowledgement• 80% GLT completed Modern Slavery Act training• 63% of employee have completed the Modern Slavery Awareness training
Mitigation of modern slavery risk	<ul style="list-style-type: none">• 2 strategic suppliers completed due diligence• 8 suppliers connected via SEDEX• Modern slavery clauses placed in new contracts• Modern slavery clauses placed in contract templates for all future agreements
Remediate	<ul style="list-style-type: none">• We were able to contact 100% of workers that were identified in the payroll and award mapping reviewing in conducted 2021 and repay all amounts owing to them

The FAIR working group has reviewed and reflected on progress in FY22 and while we have improved our governance, we recognise roll out effectiveness is below our expectations. As a result we will be focusing on smaller progress steps in targeted priority areas especially with suppliers in FY 2023 and beyond. While we did focus on raising understanding of modern slavery starting with our executive teams and management roles utilising online training and policy acknowledgements, we need greater engagement with our frontline production and warehouse staff and will need to change our approach to achieve this. This will likely be through face to face training and integration of the training in the longer term into the annual compliance and induction training.

section 6

CONSULTATION

Monde Nissin Australia is a single corporate entity with various internal business units with a group leadership team. In the preparation of this Statement, a Modern Slavery working group of cross function roles from People & Culture, Procurement and Business Excellence departments was consulted with to inform and contribute to this statement. The working group meets quarterly to monitor the progress of our FAIR: Human Rights and Modern Slavery program, identify further areas for opportunity and progress against our risk control plans that inform this Statement.

Wider consultation through the General Leadership Team that head group wide functions occurred for final review prior to CEO and Board approval.

section 7

FUTURE PLANNING

Moving forward with our sustainability strategy 2022-2025, our FAIR working group will develop the year two annual action plan to progress our program. Key areas of focus will be:

- Expansion of awareness training to our frontline people at warehousing and manufacturing sites
 - Review of our supplier due diligence process based on feedback from our pilot in 2022
 - Targeted supplier due diligence based on category risk levels (labour hire and cleaning)
 - Reviewing internal recruitment processes to strengthen human rights integration clearly into our documentation
 - Commence review of internal source to pay process and integration of modern slavery processes into this, including data capture, maintenance of information currency and supplier network visibility, that provide us transparency while balancing the amount of resource needed to maintain this in the long term
 - Greater utilisation of the SEDEX platform for our internal sites, supplier risk assessment review and procurement risk categories for our highest risk category suppliers to share ethical sourcing information and corrective actions monitoring in a collaborate manner.
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APPENDIX

Compliance elements for the statement

This Modern Slavery Statement was prepared in accordance with the criteria set out in the Modern Slavery Act 2018 (Cth) (Australia). The table below outlines where information related to each mandatory reporting criteria can be located within the report.

MANDATORY REPORTING CRITERIA	LOCATION IN DOCUMENT
Criteria 1. Identify the reporting entity	Section 1: CEO message
Criteria 2. Describe the structure, operations and supply chains of the reporting entity	Section 2
Criteria 3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Section 3
Criteria 4. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 4
Criteria 5. Describe how the reporting entity assess the effectiveness of such actions	Section 5
Criteria 6. Describe the process of consultation with any entities that the reporting entity owns or controls	Section 6
Criteria 7. Additional information	Section 7