

MODERN SLAVERY STATEMENT 2023-2024

Introduction

This is Allied Pinnacle Pty Limited's (ABN 85 161 203 005) fifth Modern Slavery Statement provided under the Commonwealth *Modern Slavery Act 2018* ('Act').

The purpose of this statement is to outline Allied Pinnacle's approach to establishing and ensuring robust frameworks and processes are in place to minimise the risk of modern slavery in our business operations and supply chain. We also aim to report on progress with identified actions and any material changes to our operations that may impact the level of modern slavery risk

As Allied Pinnacle does not own or control any other entities, this statement has been developed and applies solely to its organisation and includes all information that Allied Pinnacle considers relevant

Allied Pinnacle recognises that modern slavery can occur in many forms, including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

We are fully committed to the highest ethical standards across our business and will not tolerate or support any form of modern slavery within our operations or supply chain.

About Allied Pinnacle

We bake the future from flour every day and have been doing so for over 100 years.

With a workforce of over a 1,000 employees and contractors, and customers ranging from the smallest of bakeries through to some of Australia's largest retailers and brands, we partner with farmers and growers across the country and are a leading manufacturer and supplier of Flour, Bakery Ingredients, and Frozen Baked Goods.

This will be achieved by providing market leading solutions from grain to table, with the best quality, lowest cost, and seamless service delivered by the most capable and engaged team in a sustainable way.

Organisational Structure, Operations and Supply Chain

During the period of this report, there have been no changes to our organisational structure, operations or supply chain that would materially impact the level of modern slavery risk.

Allied Pinnacle is wholly owned by Japan's Nisshin Seifun Group.

Within Australia, Allied Pinnacle consists of a single operational entity.

Allied Pinnacle operates across three main product categories: Flour, Bakery Ingredients (Pre-mixes, Wet and Traded ingredients) and Prepared Bakery (including breads, cakes, cookies, pastries, muffins, donuts, bagels); with a customer base that includes industrial manufacturers, independent bakeries, food service, retail and export.



Allied Pinnacle manufactures and distributes its products from mills, bakeries and distribution centres located in Australia, utilising wheat from our key growing regions and other raw materials sourced from both national and overseas suppliers.

In addition to its directly employed workforce, Allied Pinnacle's operations are supported by labour hire, short-term contractors, and 3PL/4PL providers as required.

Potential Risks of Modern Slavery

We recognise that key risk indicators are commonly associated with the food and beverage industry, including:

- prevalence of base-skilled workers, with high population of migrant backgrounds;
- common utilisation of third-party labour arrangements;
- high-risk product and service categories (eg raw material supply); and
- operations within high-risk geographies (eg areas where human rights and other regulatory frameworks are weak).

During the reporting period, Allied Pinnacle has assessed no material change to its own level of risk.

Allied Pinnacle continues to own and operate its own manufacturing and distribution facilities within Australia. As a locally based, highly regulated and auditable compliance environment (for example, in respect of prescribed pay rates, working conditions and safe systems of work), Allied Pinnacle's 'finished' product supply chain represents a very low level of modern slavery risk.

While the labour market continues to present challenges for supply, Allied Pinnacle's operations are supplemented by contract labour and services utilising a core group of established and reputable local suppliers. In addition, while some labour requirements are being met from recruitment of offshore candidates, this is subject to and compliant with Australia's strict immigration and visa requirements.

Within its external supply chain, Allied Pinnacle's highest modern slavery risk is in the area of raw materials. While Allied Pinnacle deals with reputable suppliers, the extended and often offshore nature of raw material supply may mean the originating source/supplier is not readily and directly known or visible to Allied Pinnacle.

Actions to address Modern Slavery Risks

Allied Pinnacle 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:

- Employee Code of Conduct;
- Equal Employment Opportunity & Workplace Behaviour Policy;
- Ethical Business Conduct Policy;
- Social Responsibility Policy; and
- Whistleblower Policy.

The Whistleblower Policy is further enabled by an independent 'hotline' that provides anonymous reporting of unethical or improper business conduct or practice.

Allied Pinnacle's approach is supported by an ethos of strong community citizenship, including its ESG Action Plan and expanded partnerships including:

- **Foodbank**, Australia's largest hunger relief organisation, helping to fight hunger and raise awareness of the issue of food insecurity in Australia;
- **Ronald McDonald House Charities**, supporting families with children who are ill or injured;
- **CareerTrackers/CareerSeekers**, creating internship opportunities for asylum seekers, refugees and indigenous university students.

Allied Pinnacle has an approved supplier list and only these suppliers may be used for any stage of production. Approved suppliers (and any new supplier) are required to act and conduct their business consistent with our ethical and social responsibility policies, including:

- No child or forced labour;
- Compliance with labour laws applicable to the jurisdiction;
- Employee rights of freedom of association and to bargain in accordance with applicable law; and
- Respect for human rights through appropriate non-discriminatory policies and practices.

Allied Pinnacle has zero tolerance for suppliers who breach these standards and will terminate arrangements with any supplier who fails to immediately and satisfactorily remedy issues of modern slavery.

Consistent with Allied Pinnacle's commitment to improvements in diversity and equity in employment, we have committed to a target of increasing female representation within the company's leadership group and continue to progress our partnership with the National Association of Women in Operations (NAWO) and APCHAMP Women's Network.

Assessing the effectiveness of our Actions

We 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. Allied Pinnacle is subject to SMETA (Sedex Members Ethical Trade Audit) auditing, which assesses our operations against Labour, Health & Safety, Environment and Business Ethics standards;
- Remediation and management reporting of breaches identified by internal/external audit programs or Whistleblower sources;
- Engagement with stakeholders on modern slavery issues or concerns, including procurement team members, suppliers, third-party auditors and customers; and
- Periodic corporate social responsibility risk assessment of our supplier base.

Progress on continuous improvement

During the latest reporting period:

- Allied Pinnacle has continued to successfully complete SMETA assessments across multiple sites;
- Following implementation of its new payroll and timekeeping system, conducted periodic internal audit of payments and entitlements to ensure compliance with workplace regulatory requirements;
- Reviewed and updated its Equal Employment Opportunity and Workplace Behaviour policy and conducted refresher training across the company on its internal and external grievance reporting processes;
- Expanded its community partnership and employee volunteering program;
- Continued to embed and anchor our corporate values within our workplaces, our 'ways of working' and related People & Culture processes and practices;
- Committed to and commenced reporting against its target of increased female representation within the company's leadership group.

Our Future Commitments

Over the next reporting period, our key focus areas for continuous improvement will be to:

- Complete a compliance audit of key labour-hire suppliers;
- Continue to progress our diversity, equity and inclusion agenda towards Allied Pinnacle's target of increased female representation within the company's leadership group and addressing pay equity issues via its annual pay review processes;
- Develop and execute an enhanced safety strategy consistent with Allied Pinnacle's commitment to regulatory compliance and employee welfare and well-being;
- Addressing any corrective actions from internal and external auditing.

This Modern Slavery Statement was approved by the Board of PFG Topco1 Pty Limited (ABN 35 604 317 875) at its meeting of 2nd September 2024, as the principal governing body of Allied Pinnacle Pty Limited.



David Pitt
Chief Executive Officer