

BURRA
FOODS AUSTRALIA

MODERN SLAVERY STATEMENT

2020

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INTRODUCTION

This statement outlines Australian Nature Investments (ABN 16 611 339 621 – trading as Burra Foods) actions to address modern slavery and human trafficking risks as defined by the Act, in our business and supply chain for the reporting period ending 31 December 2020.

Burra Foods condemns human trafficking, child labour and any form of slavery as defined by the Act. We also fully support the:

- Universal Declaration on Human Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- International Labour Organisation Declaration of Fundamental Principles and Rights at Work

As an Australian based business Burra Foods is committed to operating our business ethically and legally and in doing so only working with suppliers that are aligned to our values. At all times Burra Foods expects and requires its suppliers to adhere to Australia's modern slavery laws.

We adhere strongly with the Fair Work Act 2009 (Cth) and expect our supply partners within Australia to do the same. Burra Foods has a strong commitment to the South Gippsland community that is the home to our business and in doing so take our social and environmental responsibilities seriously. We are committed to providing a safe workplace to our staff and readily embrace staff inclusion and diversity. In addition to this, Burra's Employee Assistance Program is extended to our milk supply partners and their families

OUR STRUCTURE

OUR STRUCTURE

Burra Foods is majority owned by the Inner Mongolian Fuyuan International Industrial (Group) Co Ltd, while a minority shareholdings is held by Itochu Corporation. Notwithstanding the ownership structure Burra Foods operates as a stand-alone entity both in Australia and overseas.

During the reporting period Burra Foods employed approximately 200 people.

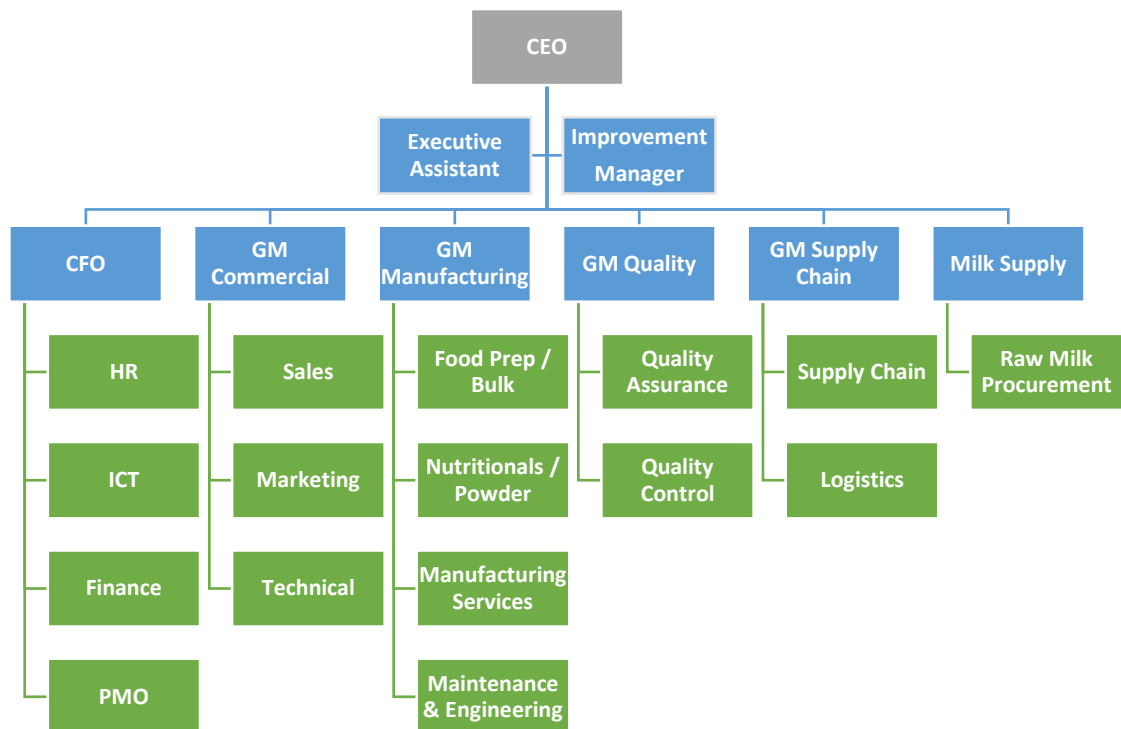


OPERATIONS & SUPPLY CHAIN

Burra Foods' core business is the procurement of raw cow's milk and the production, marketing, distribution and export of a wide range of high-quality dairy ingredients for domestic and international markets. Our product range includes (but is not limited to) bulk liquid milk, bulk frozen cream, frozen milk concentrate, frozen cream, whole milk and skim milk powders, bulk infant milk powder (bovine and goat) and extended shelf life milk.

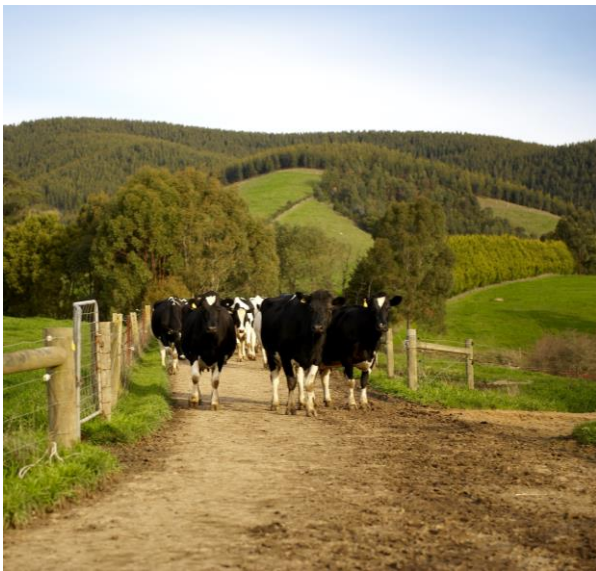
Burra Foods operates out of a single factory located in Korumburra in South Gippsland and sources dairy milk from farms throughout the Gippsland region. Due to the infancy of the industry we source our goat milk products from AVH Dairy in the Netherlands. We have a small corporate office in South Melbourne and sales offices in Japan and China. We have recently entered into an agreement with the Miraka Dairy in New Zealand for them to produce full milk concentrate on our behalf for export to Taiwan.

Our organisation structure is outlined below:



RISK ASSESSMENT

We have considered the potential for the Burra Foods to cause, contribute or be directly linked to, modern slavery through our operations and supply chains. Following assessment of our operations and supply chains, we believe the risks of modern slavery in our operations and supply chains is minimal.



RISK IDENTIFICATION, MITIGATION & REMEDIATION

Burra Foods has conducted a review of risks and controls / mitigations to enable an assessment of compliance with the act.

The following laws, practices and controls contribute to our minimal risk assessment:

- We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.
- We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity. We have a whistle-blower policy in accordance with the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth).
- Our Australian supply chain partners are required to adhere to the Fair Work Act 2009 (Cth) and in Victoria there is also the Victorian Charter of Human Rights and Responsibilities Act 2006
- Except for goat milk our supply chain consists of companies based in Australia who are all subject to Australian law and therefore there is minimal risk of modern slavery occurring. Our milk supply partners are predominantly family based farming businesses and are subject to the Australian Government's Dairy Industry Code of Conduct.
- Our supply chain partner in New Zealand, Miraka Dairy is subject to New Zealand's Employment Relations Act (2000) as well as the Human Rights Act (1993) both of which protect Miraka's workforce from any form of discrimination or abuse.
- We source our goat milk from AVH Dairy in the Netherlands. In 2019 the Netherlands legislature introduced "The Child Labor Due Diligence Bill" which requires companies to actively address human rights abuses that exist in their supply chains. As AVH Dairy are a Dutch company it is required to adhere to these laws.

RISK IDENTIFICATION, MITIGATION & REMEDIATION

- Our IT supply chain partners are, DXC and TMA Global and both have provided Burra Foods with their Corporate Social Responsibility statements which clearly set out their commitment to the promotion of human rights and the abolition of forced labour and human trafficking.
- Our other supply chain partners based in Australia are subsidiaries of global corporations all of which either have existing or proposed legislation before their parliaments condemning and outlawing modern slavery.

As part of our continuous improvement Burra Foods has joined the Supplier Ethical Data Exchange (SEDEX), a global not-for-profit membership organisation for businesses committed to the continuous improvement of ethical performance within their supply chains.

By being part of SEDEX help improve the effectiveness of buying companies' ethical trade strategies by offering a facility for supplier companies to share their audits with multiple customers.

Sedex is the largest collaborative platform for managing ethical supply chain data with over 30,000 customers and supplier sites worldwide. Through a secure online platform, SEDEX members can share and manage information related to Labour Standards, Health & Safety, the Environment and Business Ethics. Members also have access to a range of resources and reports, including industry specific questionnaires and market leading risk analysis tools, developed with global risk experts Maplecroft.

Burra Foods is therefore confident that its supply chain partners are free of modern slavery practices.

MONITORING EFFECTIVENESS, FUTURE ACTIONS & STATEMENT APPROVAL

MONITORING EFFECTIVENESS & FUTURE ACTIONS

Burra Foods' modern slavery risk review will continue each year. In the spirit of continuous improvement, Burra Foods seek to embed improved practices into our business as usual operations.

Furthermore, over the coming 12 months Burra Foods will encourage our supply chain partners to join SEDEX. We will use Sedex as a tool to manage and monitor modern slavery risks, as well as assessing the effectiveness of our actions in addressing risks and tracking remediation.

STATEMENT OF APPROVAL

This Statement has been reviewed and approved by the Board of Directors of Australian Nature Investments (as the principal governing body) on 28th October 2021, and has been signed by Stewart Carson, CEO and Director of ANI (as a responsible member of the reporting entity).



Stewart Carson

CEO and Director

Australian Nature Investments



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