

# Joint Modern Slavery Statement



This joint modern slavery statement is submitted by Kinrise Pty Ltd ACN 143 389 404 of Level 16, 644 Chapel Street, South Yarra, VIC 3141 on behalf of itself, Kin Group Pty Ltd, Green's General Foods Pty Ltd and Green's Foods Holdings Pty Ltd.



### **Contents**

A message from our CEO	2
Introduction	3
Our Structure, Operation and Supply Chains	4
Potential risks of modern slavery practices in our business	7
The actions we take to address these potential risks	9
Measuring the effectiveness of our actions	16
Process of consultation with our subsidiaries	16
Future focus	17





# A message from our CEO



As I reflect on the end of this reporting period, I am pleased to see the importance we place at Kinrise on the need to care for others enshrined in the progress we have made this year to assess and address modern slavery risks in our organisation. It is our purpose to proudly bring families together with delicious homegrown food we have made with care. How we achieve our results and living our five core values is of equal importance to us.

I am encouraged this reporting period by the increased potential we have for meaningful change and risk management provided by our investment in ETHIXBASE360, a software platform that gives us the transparency we need to identify risks in our supply chain. Also, it provides us with the data we need to build proportionate action plans in response which are guided by the risk categorisation built into the system by leading experts in this field.

I am proud of the efforts made by our team to develop and launch our first Kinrise Business Code of Conduct which was launched to all employees. This code governs the standards of behaviour we expect from everyone employed at Kinrise with very clear principles about the protection and respect for human rights which are detailed later in this report.

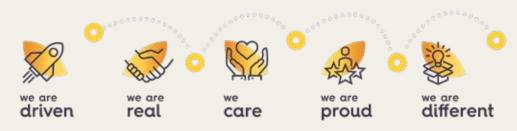
To signal our determination to foster a shared pride in the way we operate with our suppliers, we also launched our new Supplier Code of Conduct. This Code makes clear the mutual expectations we have of any supplier that we do business with including in respect of workplace practices, fair remuneration and the protection of human rights.

We have followed through on our promise to continuously improve and evolve our efforts to find ways to assess and mitigate potential risks in our supply chain which is reflected in the initiatives outlined in this report. I am encouraged by our ability to reduce risks in certain practices since the last reporting period.

I am confident, with the growing level of partnership and transparency from our suppliers and under the continued governance of our Modern Slavery Committee, that we will deliver on all our key initiatives designed to identify, prevent and mitigate modern slavery practices. We will not stop striving to invest in and implement best in class risk management practices as we continue to grow as a business.



Core Values





# Introduction

Kinrise Pty Ltd (ACN 143 389 404) (Kinrise) is an Australian food company with a diverse portfolio of Australian food businesses united by shared values, shared leadership, and a shared view of the future of food in Australia.

This is the fourth Modern Slavery Statement submitted by Kinrise pursuant to the Modern Slavery Act 2018 (Cth) (Act). It sets out the approach and actions taken by the following related entities of Kinrise (all of which are reporting entities for the purposes of the Act) to identify, assess and address modern slavery risks in the Group's operations and supply chain over the financial year ending 30 June 2023 (Statement):

- (i) Kin Group Pty Ltd (ACN 095 313 714) (ultimate holding company) (Kin Group);
- (ii) Kinrise Pty Ltd (ACN 143 389 404) (Kinrise);
- (iii) Greens General Foods Pty Ltd (ACN 001 553 564); and
- (iv) Green's Food Holdings Pty Ltd (ACN 160 202 200).

Unless expressly stated otherwise, each of the reporting entities listed above and their controlled entities as defined in the Act and listed on page 4, are referred to in this Statement as "the Group" or "our Group".

The Groups registered office is located at Level 16, 644 Chapel Street, South Yarra, Victoria 3141.





# Our structure, operations and supply chains

Kin Group and its controlled entities comprise an Australian privately owned investment business that own and operate large industrial, manufacturing, technology, and retail businesses worldwide.

Kin Group is the ultimate holding company of Kinrise. Kinrise is the parent company of the following broad portfolio of related entities:

- (i) Greens General Foods Pty Ltd (ACN 001 553 564);
- (ii) Green's Food Holdings Pty Ltd (ACN 160 202 200);
- (iii) Green's Intellectual Holdings Pty Ltd (ACN 165 758 298);
- (iv) Waterwheel Premium Foods Pty Ltd (ACN 162 115 611);
- (v) Green's Biscuits Pty Ltd (ACN 167 337 439);
- (vi) Ozpack Holdings Pty Ltd (ACN 115 009 151);
- (vii) Propax Pty Ltd (ACN 101 942 312);
- (viii) OLHS Pty Ltd (ACN 127 870 008); and
- (ix) Key Partnerships Australia Pty Ltd (ACN 109 800 937);
- (x) Burst Foods Pty Ltd (ACN 619 846 114);
- (xi) The Cake Syndicate Pty Ltd (ACN 150 924 726).



We operate across four different categories:



Snackfoods



Pantry foods



Baking & Bakery



**Biscuits** 

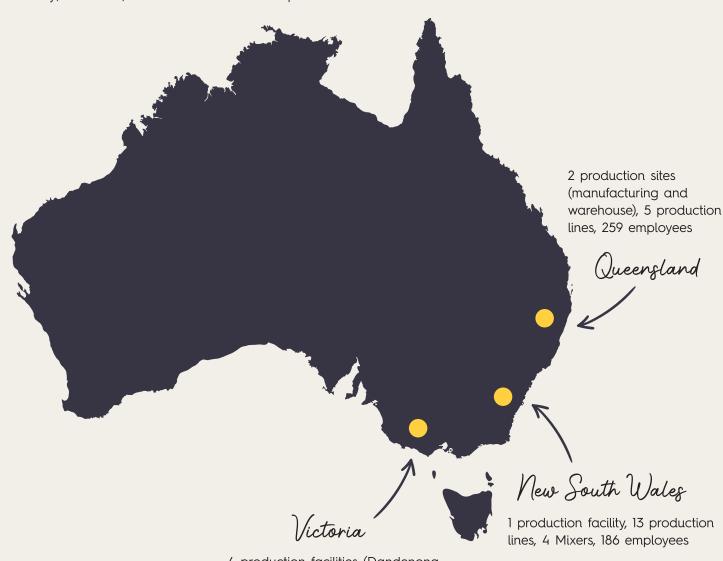






Kinrise employs 719 team members throughout the Group's operations. We strive to purchase all of our ingredients for the food we make from Australia where we can and are proud to report that now Kinrise Snackfoods business is making all of its products with 100% Australian ingredients.

Our products are manufactured for supply across Australia and for export to New Zealand, Fiji, Thailand, New Caledonia and Japan.



4 production facilities (Dandenong South, Hallam, Scoresby & Braeside), 23 production lines, 274 employees









# Kinrise manufactures food under the following brands:























### The supply chain of products and services that contribute to our Group operations include:

- (i) raw ingredients;
- (ii) packaging;
- (iii) warehousing, cold storage, freight, and distribution services;
- (iv) manufacturing equipment, and installation and commissioning services;
- (v) labour hire services;
- (vi) personal protective equipment;
- (vii) professional, legal, financial, marketing services; and
- (viii) utility services.



These 31 international suppliers make up 2.3% of our total Group spend. The 1043 other suppliers were all based in Australia.





# Potential risks of modern slavery practices in our business

We have identified several areas of potential risk in our operations and supply chain which we explore below.

#### 1. Labour Hire

We are proud of the efforts we have made since the last reporting period in respect of the potential for risk of modern slavery in the Group's operations through labour hire service providers we use that may engage foreign or temporary unskilled labour. The same risk has existed in our operations in relation to the labour practices of international suppliers that we may engage from time to time. Last reporting period we classified this risk as low to medium based on our risk mitigation processes in place at that time. However, given the progress we have made since, we would now classify this risk as very low and moving towards possible elimination. The update on how we have continued to reduce this risk lies heavily in the strength of our trust and partnerships with labour hire agencies used including compliance with the expectations we place on them in this regard. All of this is reported on and outlined further in page 15 of the statement below.

#### 2. Manufacturing equipment & packaging

The Group's largest category of spend with international suppliers during this reporting period was on manufacturing equipment and packaging, primarily sourced from the United States of America, Germany, Japan and New Zealand. According to the Global Slavery Index 2020<sup>1</sup>, these countries are not deemed high risk countries and we therefore believe the risk of modern slavery in connection with such supply arrangements to be relatively low.

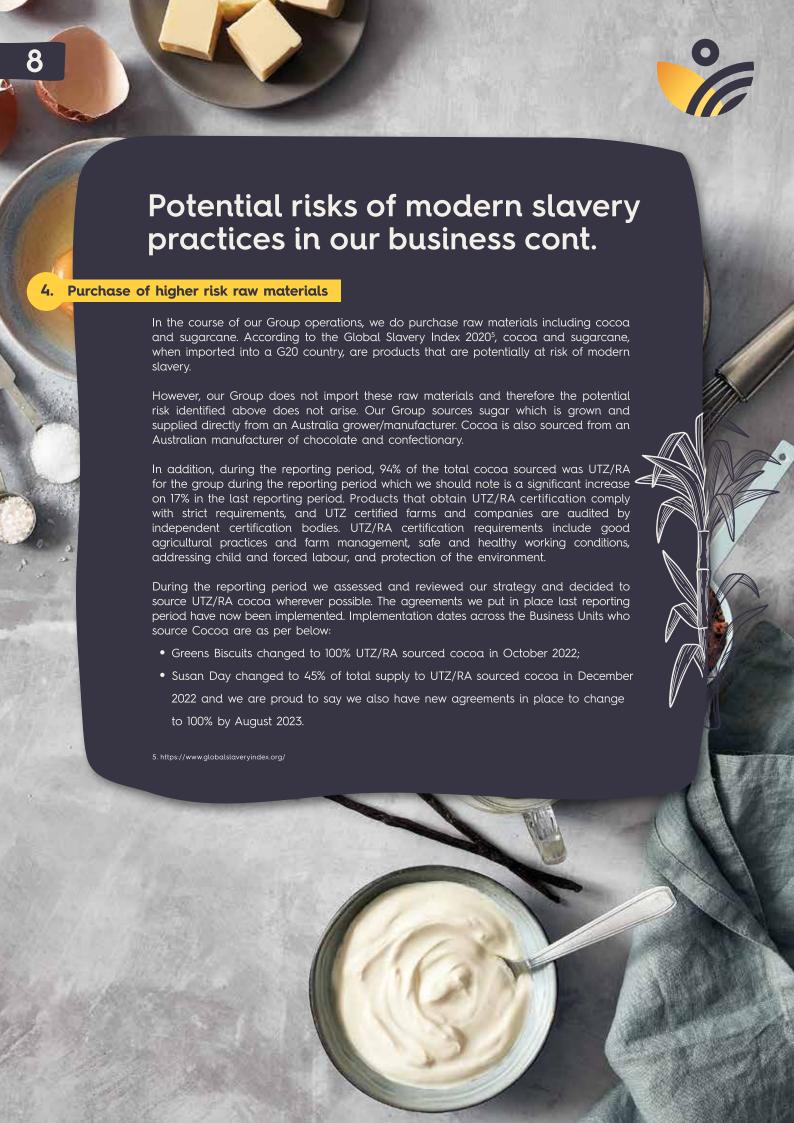
#### 3. Manufacturing processes

According to the Australia Red Cross Addressing Modern Slavery Guide for Australian Businesses², the manufacturing sector potentially contributes to the risk of modern slavery. The Group's operations include administrative, sales, marketing, and manufacturing functions. All the Group's operations, including the manufacturing function are only based in Australia which according to the Global Slavery Index 2020³ is inherently a low-risk jurisdiction. Further, the potential risk is reduced as our front line and operational roles across our sites are mostly employed under local enterprise agreements. Those agreements that have been renewed in the reporting period have been bargained in good faith and agreed terms of employment collectively and agreements are compliant with legislative requirements, with union or other bargaining person representation. These conditions are set out in relevant agreements including the Kinrise Snackfoods Enterprise Agreement 2023-2026 which was recently approved and commenced on 11 September 2023.

We are also very pleased to include in this report that we have introduced a new Business Code of Conduct for our employees internally (including its launch across our entire manufacturing workforce), which we believe contributes to a further reduction of any risk of modern slavery in our local manufacturing processes, the specific details of which are provided in page 12 of this Statement below.

- 1, 3. https://www.walkfree.org/global-slavery-index/
- 2. Australia Red Cross Addressing Modern Slavery Guide for Australian Businesses Feb 2020







## The actions we take to assess and address these potential risks

Our approach to managing modern slavery risks is addressed in various ways. We are dedicated to ensuring we are always looking for opportunities for continuous improvement in our approach to best and most effectively manage risks. We are proud to highlight all these evolutions in our approach in this report.

### 1. The Modern Slavery Committee

The foundation of our governance approach is now managed by our Modern Slavery Committee (the Committee). The Committee comprises of key leaders of the Group across multiple relevant functional areas of the business including People & Culture, Procurement, Legal, Finance and Food Safety and Quality.

During this reporting period the Committee met five times. The Committee currently meets once per quarter, however, in this earlier part of this reporting period the Committee met more frequently in order to gain good traction on its commitment to managing modern slavery risks in a meaningful way.

The Committee is chartered by a documented three-year road map (the "MS Roadmap") which ensures appropriate prioritisation of activities for Kinrise to deliver on in managing any potential risks in our supply chain and operations. This MS Road Map allowed the Committee to efficiently monitor progress and timing on all key deliverables. In this reporting period, the Committee was able to deliver on all planned initiatives during the reporting period. Some of the key highlights of actions taken by the Committee in its efforts to effectively identify and manage the potential risks are included in this section of the report.



One of our core
values is We Care
and that means always
striving to do better
for our people and
our communities.



### 2. Investment in technology

We entered into an agreement to engage with and implement the use of a world class third party software platform called Ethixbase360 (Ethixbase). This platform is a software solution that gives us full and detailed transparency into our third-party supplier network. It has the following key features that contribute to our efforts to identify, manage, mitigate and report on the risk of modern slavery in our supply chain:

- Risk Assessment: an innovative easy to complete modern slavery questionnaire (MSQ) allowing us to engage with our suppliers.
- Risk Based Due Diligence: Based on risk ratings from data collated in the MSQ.
- Reporting and Analytics: Critical data enabling us to strategically address risks.
- Ongoing Monitoring: Alerts when status changes occur allow for swift follow up action.

We commenced the onboarding of Ethixbase into our business in November 2022 and released our first MSQ to our supplier base in February 2023. During this reporting period, we undertook multiple workstreams to gather the database of suppliers, populate the finalised MSQ, perform software user testing, and develop our supplier communication plan.



Suppliers were requested to respond by the end of March 2023. In April 2023, we commenced our analysis of responses provided and overlayed the Ethixbase risk assessment criteria to determine the risk profile of our supplier base. This involved running several due diligence reports to delve into the market relationships and activities of our suppliers to identify potential risks.

The Procurement team provided regular updates to the Modern Slavery Committee and presented to the CEO on the progress at each of the milestones captured in our MS Roadmap.

In this reporting period, we received completed MSQ's from 33.4% of those suppliers we issued it to.

Below is a snapshot of the completion status of all MSQ's issued by the Group as at 30 June 2023:

Total	In Progress	Completed	Not Started	Alternate End State	
398	7	133	241	17	
	1.8%	33.4%	60.6%	4.3%	



Image 1: Supplier Business Operations Mapping as at 30 June 2023





### 3. The launch of a new Kinrise Supplier Code of Conduct

We are very proud to share a full copy of our new Kinrise Supplier Code of Conduct on page 13 of this report. This Code can also be found on our website www.kinrise.com.au.

The Supplier Code of Conduct Code sets out the standards and requirements which Kinrise requires all our suppliers to meet and will enable us to build greater clarity of our expectations in onboarding and via our contractual relationships with suppliers including as it relates to respecting human rights, provided safe workplaces and ensuring fair salary and working conditions.

We have set up a dedicated supplier email address for any enquiries about this Code with the inbox managed by Head of Procurement for all enquiries.

During this reporting period, we engaged in a full and comprehensive internal and external communication plan about our Supplier Code of Conduct ensuring that all staff were aware of and educated about its key principles. Our CEO also issued an email communication attaching the new Code to our entire supplier database with clear messaging about the criticality of compliance with the Code.

The communications made clear that our Kinrise values represent uncompromisingly high standards of quality, integrity and compliance with the law and a deep respect for human rights and implementing responsible workplace policies and practices and that these expectations were mutual.

#### 4. The launch of a new Kinrise Business Code of Conduct

We have launched a new Kinrise Business Code of Conduct to all our employees which was created to help ensure that the business that we do is always in line with Kinrise's purpose and values. This Code is our guiding light in every single business decision, transaction or conversation and describes not only how we should interact with each other internally but also with our customers, suppliers, key partners and stakeholders.

The Code naturally includes detailed principles and expectations relating to treating people respectfully and fairly but also doing business in obeyance of all laws and regulations that apply to our business and its operations. We have a dedicated section of the Code documenting our expectations of employees in protecting and respecting human rights.

The Code makes clear that at Kinrise we opposed exploitative, inhuman labour practices including the illegal use of child or forced labour and that we ensure all employment is freely chosen.

The Code provides a direct link to our Kinrise Supplier Code of Conduct and makes it clear, amongst other things that we do not condone the violation of any labour and employment laws in the countries we do business and that we have a zero tolerance approach to Modern Slavery of any kind in our operations.

We have future plans for the ongoing communication and education of our staff regarding the principles housed in our Code which is detailed further on page 17 of this report.



Creating moments of joy through food.

#### **Kinrise Supplier Code of Conduct**

#### **Our Values and Commitments**

At Kinrise, we are driven by our purpose and mission.

Our  ${\bf purpose}$  is to proudly bring families together with delicious homegrown food we've made with care.

Our **mission** is to create moments of joy through food.

We also believe that how we achieve our results is as important as the results we achieve so we are committed to championing and living our five core values:



As Kinrise continues to grow, so does our responsibility to each other, our communities and our consumers. We are committed to respecting human rights and implementing responsible workplace policies and practices. We expect all our supply chain partners to have those same commitments.

This Supplier Code of Conduct sets out the requirements and standards which Kinrise requires all our suppliers to meet. This Code will apply to all suppliers. Kinrise reserves the right to verify compliance with this Code and to terminate any contract, arrangement or understanding if the supplier does not comply with this Code.

#### Obey the Law

Comply with all local and national laws that apply to your business operations and your dealings with Kinrise.

#### **Act with Business Integrity**

Conduct your business with honesty, integrity and commitment to the highest standards of ethical conduct. Do not engage in, encourage, or permit unlawful or unfair trade practices or any method of obtaining undue or improper advantage, including bribery, corruption, extortion or embezzlement.

#### **Respect Human Rights**

Do not engage in any form of modern slavery as defined in the *Modern Slavery Act 2018* (Cth) and local laws. Adhere to international human rights laws and principles\*.

#### **Protect the Environment**

Conduct your business to protect and preserve the environment.

#### **Provide a Safe and Healthy Workplace**

Provide a secure, safe and healthy workplace. Minimise the risk of accidents, injury and hazards inherent in the working environment.

#### **Salary and Working Conditions**

Pay your employees fairly, relative to industry and local standards and at least in accordance with all relevant laws and agreements. Make sure your employees' working hours are not excessive such that their health or safety are negatively impacted and comply with all laws in relation to work hours and overtime.

#### Respect Employees' Rights to Freely Associate and Collectively Bargain

Recognise and respect your employees right to freely associate, organise, and bargain collectively. Do not discriminate or retaliate against employees who exercise these rights.

#### **Maintain Grievance Procedures**

Provide employees with a grievance process. Respect grievances without reprisal and ensure concerns are addressed in a timely manner.

#### **Do Not Discriminate**

Do not engage in any form of discrimination including discrimination on the basis of age, race, colour, language, nationality, disability, ethnicity, religious belief, political views, gender, sexual orientation or marital status.

#### **Do Not Tolerate Harassment or Bullying**

Ensure the work environment is free from actual or threatened harassment, abuse, bullying, and intimidation, whether physical, psychological, verbal, sexual, or otherwise.

#### **Implement Appropriate Management Systems**

Develop and implement systems to ensure compliance with the law, this Code and respect for all human rights.

Use of the term "Kinrise" in this Code refers to Kinrise Pty Ltd ACN 143 389 404 and its related entities, Burst Foods Pty Ltd t/a Cobs Fine Foods ABN 67 619 846 114, The Cake Syndicate Pty Ltd t/a Susan Day Cakes ABN 19 150 924 726 , Propax Pty Ltd t/a Ozpack ABN 16 101 942 312, Green's General Foods Pty Ltd ABN 56 001 553 564 , and Green's Biscuits Pty Ltd ABN 26 167 337 439.

\* This includes the United Nation Global Compact, the United Nation Universal Declaration of Human Rights, the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, and the ETI Base Code.

If you have any queries about this Code, please contact Kinrise on suppliercode@kinrise.com.au.













### 5. Training

All new starters who are salaried employees are issued within their first few weeks of employment with online compliance training modules in respect of Workplace Behaviours which must be completed within 30 days. This module sets the expectations from Kinrise for our employees in respect of ethical and illegal conduct including how to manage any associated incidents.

#### 6. Company Policies

The Group also has the following existing policies all of which were all reviewed and updated during this reporting period for compliance with relevant legislation and requirements and to enhance the details relating to modern slavery occurrences:

- Equality and Diversity Policy
- Whistleblower Policy
- Work Health and Safety Framework
- Grievance Handling Policy & Procedure

We are pleased to report that we have developed, issued and launched two new Group wide policies in this reporting period including both of which provide an excellent process and standard of governance regarding of how we select suppliers and the level of contractual coverage (particularly in relation to compliance with our Codes of Conduct) to better manage modern slavery and forced labour risks in our supply chain:

- The Procurement Policy
- The Contracts Policy

This kind of critical analysis and decision making about our supply arrangements continues to be effectively managed by our centralised procurement function who tightly manages how we onboard, get to know and manage our supplier base with more of a dedicated and proactive oversight and in strict accordance with these new policies.

The Kinrise Whistleblower Policy states that any illegal and/or unethical conduct will be investigated and includes a hotline operated by an independent service provider that employees can contact at any time.

The Group's Diversity & EEO Policy states that all employees are entitled to be treated with dignity, courtesy and respect, work free from discrimination, bullying and harassment, and have the right to raise issues or make an enquiry or complaint without being victimised.

The Kinrise Work Health and Safety Framework sets out a thorough and compliant structure for the management of Health, Safety and Environment within the business.

The Group's Grievance Handling Policy states that all team members have the right to make a complaint to their direct team leader or another team leader and be treated with respect and impartiality throughout the process.

We have developed supplementary compliance tools accessible for all employees that summarise these policies in a one-page Quick Guide to make comprehension and key principles clear for everyone and to ensure that awareness and understanding remains high for better compliance.



### 7. Third Party Contract Terms

Our Kinrise master goods and services procurement agreement template includes contractual controls that:

- allow Kinrise to request a written report addressing the supplier's measures to identify the risks of modern slavery practices;
- require the supplier to represent and warrant to Kinrise that the supplier, to the best of its knowledge and belief and as at the date of entering into the agreement with Kinrise or a member of the Group, does not, and will not, use any form of modern slavery in performing its obligations under the agreement;
- require the supplier to notify Kinrise if it becomes aware of any risks that modern slavery will be used by the supplier; and
- in certain circumstances, require the supplier to develop and implement a Modern Slavery policy and due diligence processes in its operations.

Kinrise does engage labour hire service providers across all our manufacturing sites in NSW, Victoria and Queensland. Our labour hire service procurement agreement template includes provisions that require the labour hire service provider to ensure that any personnel employed by them to perform services on their behalf to the Group are properly characterised, engaged and provided with clear terms of employment that comply with all applicable laws, and are paid and provided all employment related entitlements and rights in accordance with all applicable laws.

In addition to the above measures, when sourcing the supply of products and services that contribute to our Group's operations, the Group continues to aim to take into consideration whether the product or item can be sourced domestically in order to reduce the risk of modern slavery in the Group's supply chain. During this reporting period, we continued to make conscious choices to source certain ingredients domestically including sourcing of ingredients such as corn and oil which were historically produced offshore but which we continue to source from local suppliers/growers.



# Measuring the effectiveness

During this reporting period, the Group's manufacturing facilities participated in SEDEX members Ethical Trade Audit (SMETA) audits. A SMETA audit is a social audit used by businesses to assess and understand if they are meeting responsible business practices and social compliance, such as, the working conditions at the business, health and safety of workers, human rights including labour force and child labour. Once an audit is complete, the business can then work to

During this reporting period, we are pleased to report that no significant modern slavery risks were identified. There was a finding in the last reporting period that on one of our manufacturing sites there was a need for a more focused effort in relation to human right impacts on our stakeholders including communication of the company's position on human rights to suppliers. We have now remedied this through the launch of our Supplier Code of Conduct and other associated corrective action plans associated with the launch of this Code outlined on pages 12 and 13 of this report. At Kinrise we follow the SMETA audit guidelines across all of our sites to ask the labour hire agency for proof of right to work documents for all workers on our premises and confirm the rates we paid them for fairness and to audit the process. During this reporting period, the SMETA audits conducted have not revealed any instances where this process was

# Process of consultation with

In the course of preparing this Statement Kinrise has consulted with each member of the Group specified on page 3, the Legal team, and the Kinrise Procurement team that has day-to-day accountability for sourcing the products and services in it supply chain that contribute to the Group's operations.



### **Future Focus**

FY2023 was a year of continued focus on Kinrise's future growth. As we continue to mature as a business, we keep the spirit of continuous improvement enshrined in the Act firmly imprinted on our minds and in our plans and across all of our business units. We have heavily invested this reporting period in the resources, technology, systems and processes needed to measure, identify and assess any potential or real modern slavery risks that exist in our business. This investment is enabling us to fulfil our mission for more meaningful and impactful management of those risks in our supply chain.

The Kinrise Modern Slavery Committee remains committed to ongoing quarterly meetings and delivery of all key initiatives in its MS Road Map for the next reporting period.

We plan to deliver a dedicated and focused communication and education plan for our staff to drive awareness, understanding and compliance with our new Kinrise Business Code of Conduct and its principles including in relation to the respect of human rights. This plan will include online and face to face training for both our salaried and our manufacturing workforces.

We will continue maximising the use of Ethixbase capability to dive deeper into understanding our direct and indirect supplier base including a more determined effort to find ways to increase response rates. Specifically, we will share actions taken in the next reporting period to put in place risk remediation action plans for the two high risk suppliers identified in this reporting period. We will apply rigour in seeking to understand better their risk profile and if we are unable to remediate the risks, we will consider exiting our supplier arrangements. Our focus will continue to be on our supplier engagement strategy and ensuring our approach is commensurate to their risk level.

This statement has been approved by the Board of Kin on behalf of the Group.

Raphael Geminder Director of Kin

Raphael Geminder

Director of Kin



