



# Modern Slavery Statement

Year Ending 1 August 2021



# Reporting Entity

This Statement describes the actions taken by The Arnott's Group to address modern slavery risks in our business and supply chains in the year ending 1 August 2021 pursuant to the requirements of the Modern Slavery Act 2018 (Cth). In this Statement, The Arnott's Group refers to Snacking Investments Holdco Pty Ltd (ACN 634 908 482) and its related bodies corporate, as defined in Section 50 of the Corporations Act 2001 (Cth). This Statement is given by Snacking Investments Holdco on behalf of itself, as a reporting entity, and the other reporting entities in The Arnott's Group.<sup>1</sup>

<sup>1</sup>This Statement is made for the following reporting entities within The Arnott's Group: Snacking Investments Holdco Pty Ltd (ACN 634 908 482), Snacking Investments MezzCo Pty Ltd (ACN 634 908 795), Snacking Investments MidCo Pty Ltd (ACN 634 908 893), Snacking Investments Bidco Pty Ltd (ABN 18 634 909 032), Arnott's Group Holdco Pty Ltd (ABN 17 635 109 081), Arnott's Bidco Pty Ltd (ABN 50 635 108 851), Campbell Australasia Pty Ltd (ABN 28 004 456 937), Arnott's Holdco Pty Ltd (ABN 80 007 245 105), Arnotts Pty Ltd (ABN 41 000 003 001), Arnott's Biscuits Limited (ABN 44 008 435 729), Good Food Partners Holdco Pty Ltd (ABN 47 646 575 662) and Good Food Partners Pty Ltd (ABN 38 104 048 400). This Statement predominantly describes the operations of Arnott's Biscuits Limited, Campbell Australasia Pty Ltd and Good Food Partners Pty Ltd, being the only reporting entities that operate The Arnott's Group's business in Australia.

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# Statement by the CEO

The Arnott's Group is the custodian of some of Australia's most iconic food brands, many holding a special place in the hearts and pantries of Australians for over a century and a half.

As a company with a significant footprint, including manufacturing facilities and corporate offices, we recognise the need to do our part in creating an ethical and sustainable supply chain in which we uphold the highest standards for all people.

In June 2021, The Arnott's Group released its first Sustainability Statement, which was our formal contribution to the ongoing dialogue around a sustainable food system. The Statement outlined how we as a business intend to do our bit in preserving the planet and its people and promoting connectivity and community.

The main areas that we identified as focus areas are:

- ✓ **Sourcing** our ingredients in a way that protects the earth and strengthens regional communities.
- ✓ **Making** our products in a way that is ultimately climate neutral and promotes a circular economy.
- ✓ **Connecting** with our consumers, retailers, employees and the broader community to promote a more sustainable way of life.

We view our commitment to the elimination of modern slavery as a cornerstone of our sustainability strategy, and one that has been widely adopted across our business. Our commitment is outlined in our 2021 Modern Slavery Statement, which reflects our business activities as a whole, across Australia, Asia and New Zealand.

I'm proud of the work that our team has undertaken in this past year, in particular the adoption of new processes, implementation of employee training programs as well as the strengthening of ethical expectations for new and existing suppliers.

We acknowledge that there is still more to do - in fact, we are more determined than ever to address and eliminate the risks of modern slavery within our supply chain, and where possible, beyond.

George Zoghbi



Chief Executive Officer  
Director, Snacking Investments Holdco Pty Ltd



# 1. Structure, Operations and Supply Chains

## **IN BRIEF**

The Arnott's Group portfolio of brands continues the 155-year legacy of the Arnott family, providing quality, great-tasting food to create delicious moments for consumers across the world. Employing approximately 4,000 people in markets across Asia Pacific, The Arnott's Group is headquartered in Sydney, Australia with operations in Auckland, New Zealand and bakeries in Western Sydney, Brisbane, Adelaide and Indonesia. In addition, our portfolio includes Campbell's products in Australia, Malaysia, Hong Kong and Japan, with manufacturing operations for these products in Shepparton, Australia and Malaysia. During the reporting period, The Arnott's Group became the majority owner of a new cereals and snacking business known as Good Food Partners, and also acquired the New Zealand based 180 degrees biscuit business. Collectively, The Arnott's Group, sources direct inputs to our products, and other goods and services for our operations, from suppliers all over the world.



## Structure

Snacking Investments Holdco Pty Ltd (ACN 634 908 482) is an Australian private company which owns the key reporting entities within The Arnott's Group:

- ✓ Arnott's Biscuits Limited (ABN 44 008 435 729), which operates the biscuits and snacks portfolio; and
- ✓ Campbell Australasia Pty Ltd (ABN 28 004 456 937), which operates the juice, soup and stock portfolio

These two companies essentially operate as a single business using the same policies and processes and under the management of the same leadership team.

As a result of acquisitions during the reporting period,

Snacking Investments Holdco now also owns a **75% interest in Good Food Partners** Holdco Pty Ltd (ABN 47 646 575 662),

which is the holding entity for Good Food Partners Pty Ltd (ABN 38 104 048 400). Good Food Partners Pty Ltd operates a cereals and snacks portfolio as a standalone business unit within The Arnott's Group (referred to in this statement as "Good Food Partners"). This statement includes activities of Good Food Partners Pty Ltd as the operating reporting entity for the Good Food Partners business.

The registered office for all reporting entities in The Arnott's Group is in North Strathfield, New South Wales.

Outside of Australia, Snacking Investments Holdco owns The Arnott's Group operating entities in Hong Kong, Indonesia, Japan, Malaysia and New Zealand. Snacking Investments Holdco does not itself carry out The Arnott's Group's business activities.



## Brands

The Arnott's Group's portfolio of brands includes household names like **TimTam, Shapes, Iced VoVo, SAO, Vita-Weat, Salada and Tiny Teddy**. In addition to biscuit brands, the portfolio includes Country Ladle and Real Stock products, as well as the Campbell's and V8 brands for soup, stock and juice products under licence by Campbell Soup Company.

With Good Food Partners being a business unit of The Arnott's Group, our portfolio now also includes cereals and snack brands such as Messy Monkeys, Heritage Mill, Arnold's Farm, Freedom Foods and Sam's Pantry.

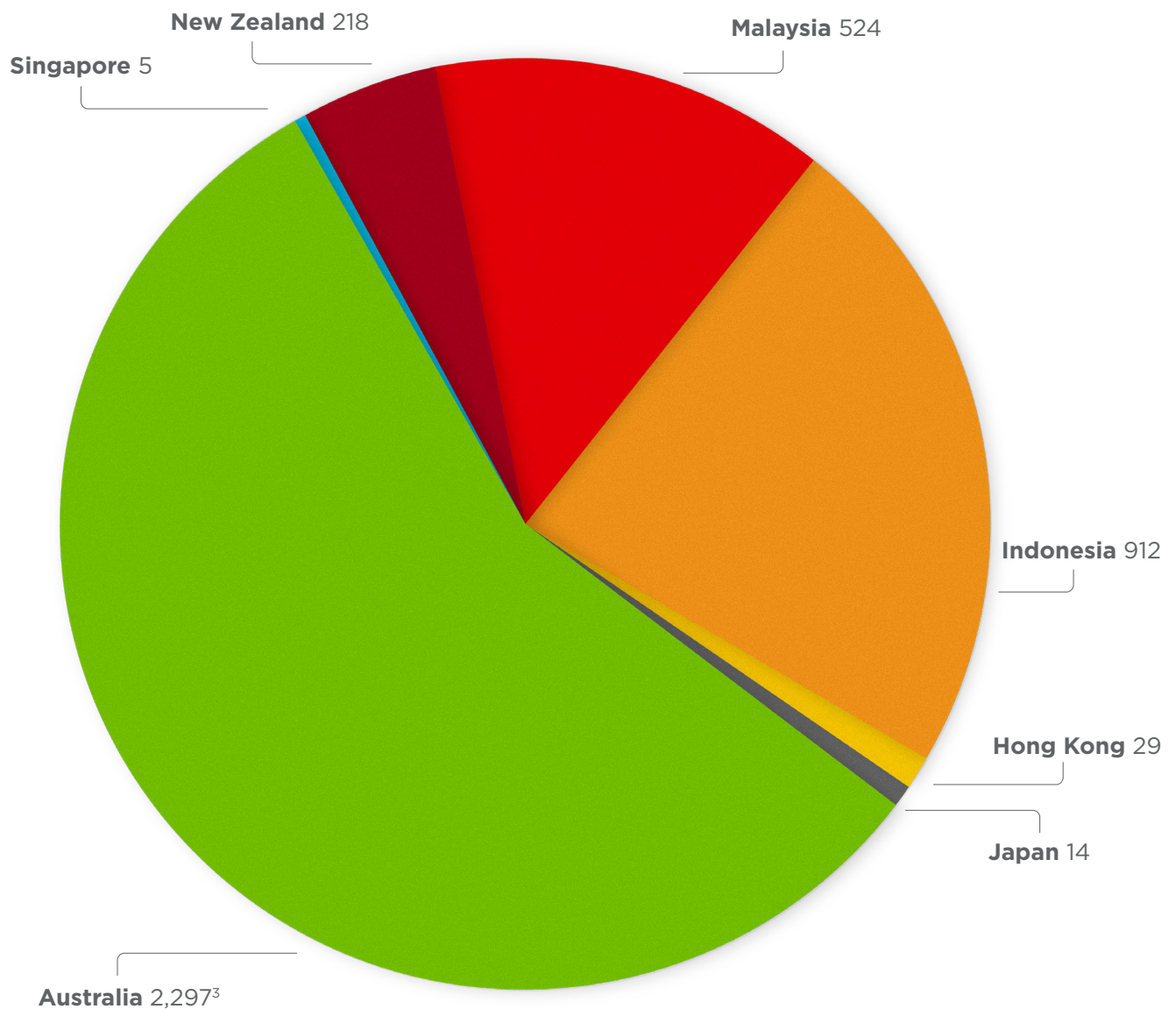
The Arnott's Group also now owns the full range of 180 degrees crackers and biscuits as a result of acquiring the New Zealand company, 180 Degrees Ltd, during the reporting period.

# Operations

The Arnott's Group undertakes a range of activities in pursuit of our business objectives and standards. **These include:**

- ✓ Direct and indirect employment in manufacturing, field sales and corporate activity
- ✓ Production of biscuits, crackers, snacks, cereals, meals, soup, stock and juices
- ✓ Development of new food products
- ✓ Merchandising services at customer retail premises
- ✓ Product distribution, purchasing, marketing, sales and exports
- ✓ Operation of The Arnott's Foundation, a charitable arm supporting community initiatives

The Arnott's Group's geographic staff profile is shown below<sup>2</sup>:



<sup>2</sup> Approximate employee numbers (excluding casual employees) as at 1 August 2021.

<sup>3</sup> Of this number, 1,825 were employed by Arnott's Biscuits Limited, 161 were employed by Campbell Australasia Pty Ltd, 311 were employed by subsidiaries of Good Food Partners Holdco Pty Ltd.



# Supply Chains

## **The Arnott's Group, excluding Good Food Partners**

During the reporting period, The Arnott's Group's Australian operations (excluding Good Food Partners) sourced inputs for our products directly from approximately 139 suppliers<sup>4</sup>. These included ingredients such as flour, dairy, salt, flavours, colours, juice concentrates, vegetables, spices, fruits, yeast, diced tomato and tomato paste, sugar and other sweeteners, cereals, malt, cocoa, nuts, eggs, chocolate, and oils, as well as packaging such as paper, plastic and adhesives. We procured other goods and services from approximately 1,670 other suppliers, including maintenance and operations, marketing, logistics, capital, human resources, corporate, IT and telecommunications, and utilities services.

The Arnott's Group's supply chain arrangements largely remained the same as in the previous reporting period.

We continued our commitment to local manufacturing, with more than **99%** of products sold in Australia made in Australia.

In addition to sourcing key ingredients like flour and grains, dairy products and sugar within Australia, The Arnott's Group continued our arrangements for the procurement of goods and services from Belgium, Brazil, Canada, Chile, China, Costa Rica, Denmark, Egypt, France, Germany, Greece, India, Indonesia, Italy, Malaysia, Mexico, New Zealand, Norway, Philippines, Singapore, Spain, South Korea, Switzerland, Taiwan, Thailand, The Netherlands, Turkey, UK, USA and Vietnam.

Most of our long-term arrangements with key ingredient suppliers remained in place during the reporting period. We continued to utilise short-term arrangements as necessary.

We also worked with two Australian co-manufacturers during the reporting period, including one engaged to manufacture our new gluten-free product lines.

## **Good Food Partners**

Good Food Partners sourced direct inputs for products from approximately 200 suppliers during the reporting period. These included raw materials such as oats, dried fruits, seeds, syrups and nuts, packaging and consumables. Most of these direct suppliers are based in Australia. Good Food Partners also sources from suppliers in Europe, USA, South America and Asia through arrangements with local suppliers.

<sup>4</sup> As at the end of the reporting period, we had approximately 230 suppliers of direct inputs to production. This included 139 whom we engaged directly, with the remainder engaged through a distributor.



## 2. Assessment and Mitigation of Modern Slavery Risks

### IN BRIEF

The Arnott's Group took actions to strengthen our stance against modern slavery during the reporting period, building on our previous efforts. As part of our ongoing commitment to human rights:

- We have continued to work with suppliers to secure their commitment to responsible sourcing, including in relation to modern slavery.
- We have continued to leverage the Sedex platform to gain greater visibility of the risks associated with existing and potential suppliers, and now require key suppliers to be Sedex members as a minimum condition of engagement.
- We educated our own employees on modern slavery issues through a new online training program.
- We established internal policies to ensure that actions taken by the business align with our commitment to minimise modern slavery risks in our operations and supply chains.

# Our Actions

The Arnott's Group has built on the foundational work that was done in our first reporting period in relation to modern slavery.

Our modern slavery working group defined an action plan for the reporting period with clear goals aimed at minimising modern slavery risks in our operations and supply chains.

The working group met regularly throughout the reporting period to ensure **we were taking necessary steps** to achieve each of these **goals**.

We are pleased to report on the progress made in relation to modern slavery in this reporting period. **Some of the actions we took are outlined below.**

## Modern Slavery Guidelines and Checklist

- ✓ We developed Modern Slavery Guidelines which capture The Arnott's Group's approach to addressing and eliminating modern slavery risks within our operations and supply chains. The Guidelines include the process for assessing modern slavery risk in relation to prospective suppliers, our minimum conditions of engagement (see further below), and a process for reporting and dealing with modern slavery concerns that arise.
- ✓ To ensure compliance with our Modern Slavery Guidelines, we also developed a Modern Slavery Checklist for employees to use when engaging any new supplier.
- ✓ With underpayment of workers being a key risk in some industries, our checklist includes a requirement for suppliers in those industries to complete a questionnaire in relation to their payment rates and practices, providing us with the relevant data points to assess underpayment risk.

## Training for employees

- ✓ We implemented a new online compliance training program for our employees, with modern slavery being the first substantive topic rolled out. The course educated employees on modern slavery in a clear and comprehensive way, raising internal awareness of this important issue as well as The Arnott's Group's reporting obligations.
- ✓ Training was provided to employees across all functional groups, going beyond our goal from the last reporting period to provide this training only to employees involved in procurement.
- ✓ The training referenced and linked to our key modern slavery policy documents (including our Human Rights Policy and the Modern Slavery Guidelines and Checklist). It was designed to educate employees on The Arnott's Group's stance on modern slavery and the measures we have put in place, including processes that employees are required to follow, to address modern slavery risks.

## Sustainability

We published The Arnott's Group's first Sustainability Statement during the reporting period and have already taken a number of, key actions to bring our sustainability commitments to life.

### Expanding and strengthening our responsible sourcing expectations of suppliers

- ✓ Our Modern Slavery Guidelines establish some key requirements as minimum conditions of engagement of suppliers. These include a commitment to uphold the principles and commitments in our Human Rights Policy and Sustainability Statement, supplier membership with Sedex and a Sedex relationship with The Arnott's Group, compliance with our Responsible Sourcing Supplier Code (RSSC) and Supply Base Requirements and Expectations Manual (where applicable), and annual certification of compliance with these requirements if requested. These minimum commitments are also required under our supplier contracts and purchase terms.
- ✓ These key requirements are in addition to the contractual commitments that we require of our suppliers in relation to modern slavery, including warranties that they do not engage in any modern slavery practices in their business.
- ✓ Our policy documents and supplier expectations apply for all of The Arnott's Group. We have produced local language versions of the policy documents for our businesses in Asia to ensure these are implemented consistently across the group.

### Utilising Sedex to help identify modern slavery risks in relation to our suppliers

- ✓ We continued the program we commenced in the last reporting period to establish Sedex relationships with our suppliers. We took the further step of starting to actively request that our suppliers complete a Sedex self-assessment questionnaire (SAQ) to enable a more comprehensive insight into modern slavery risks associated with their business. We prioritised the suppliers of our key materials (flour, dairy, oils, sugar and cocoa, which comprise approximately 60% of the materials we procure) for this exercise, in line with the commitments in our Sustainability Statement.
- ✓ Through an increased number of Sedex relationships with our suppliers, we have been able to more accurately assess modern slavery risks through access to completed SAQs and ethical audit reports in relation to a greater proportion of our suppliers. This has allowed us to make more informed decisions about their ongoing engagement.
- ✓ We also set targets for Sedex relationships and SAQ completion across our supplier base for the next three reporting periods, setting up a pathway for increased visibility of supplier risks year on year.



### Enhancing avenues for reporting modern slavery concerns

- ✓ We expanded the coverage of our whistleblowing platform to enable suppliers and other third parties to report any modern slavery concerns in relation to our business confidentially and anonymously. We updated our RSSC to ensure that our suppliers are aware of this avenue for reporting.
- ✓ In addition, we continued our internal communications campaign, including reminders from our CEO and bespoke Code of Conduct compliance training, to promote the whistleblowing platform to our employees as a safe way to report concerns, including in relation to modern slavery.

### Ethical audits

- ✓ We completed a SMETA audit of our Shepparton site during the reporting period. The audit identified two minor non-conformances which have since been addressed. The results of our audit satisfied the ethical sourcing requirements of one of our major Australian customers, validating our confidence in the operations of and business practices engaged in by the site.
- ✓ In the spirit of holding ourselves to the standards we expect of our suppliers, we committed to complete SAQs for the remainder of The Arnott's Group sites across Australia in the next reporting period.
- ✓ We also committed to conduct ethical audits of selected key and/or high-risk suppliers in the next reporting period, with funding allocated for this exercise.
- ✓ Good Food Partners continued its existing audit program involving completion of Sedex SAQs every six months, as well as ethical audits every 24 months, for each of its sites.

# Key Risks Identified

## Previously identified risk areas

In the previous reporting period, we undertook a comprehensive review of modern slavery risks in our operations and supply arrangements. We reported on a number of modern slavery risk areas identified through that process, and the actions we have taken to address and mitigate the relevant risks. We did not identify any changes to these risks during this reporting period that necessitated any change to our existing measures.

As described in the previous section,

we have also strengthened our **responsible sourcing expectations of suppliers in this reporting period,**

further reducing any ongoing modern slavery risks associated with existing suppliers in the risk areas identified our previous statement. The introduction of these requirements, backed by new internal processes developed during the reporting period, also minimises modern slavery risks with new suppliers in these areas.

## TO RECAP ON THE KEY RISK AREAS IDENTIFIED IN OUR LAST STATEMENT:

### Our labour force in Asia

We continued to honour our commitments to human rights in the employment of labour at our sites in Asia.

In Malaysia, we directly employ some Nepalese foreigner workers at our manufacturing facility as part of our resourcing strategy. We sponsor work permits for these workers and pay them in accordance with their employment terms as endorsed by the Nepalese and Malaysian governments. We also pay for their welfare (e.g. medical, uniforms), hostel accommodation and transportation services. We adhere to applicable labour regulations and ensure that hostel accommodation provided to the employees is suitable and complies with applicable safety requirements.

In Indonesia, the workforce at our manufacturing facility is comprised of Indonesian nationals. We continue to be assured of the standard of our labour practices through the outcomes of SMETA audits carried out at the request of our key customers.

### High-risk ingredients

The measures we take in relation to two key ingredients used in our products, which are known to be associated with modern slavery risks, are described below:

- ✓ **Palm oil.** We only purchase palm oil that is certified sustainable by the Roundtable on Sustainable Palm Oil (RSPO), with the aim to ensure no deforestation, no peat destruction and no exploitation of local communities and workers. The RSPO has the support of leading conservation organisation World Wildlife Fund (WWF), which advocates for sustainable sourcing of palm oil and argues boycotting or replacing palm oil will potentially harm local communities.
- ✓ **Cocoa.** All of the cocoa liquor we source from the high risk area of West Africa is certified through UTZ-Rainforest Alliance

to ensure that our purchases can be used to make positive changes for cocoa-growing communities and families. We also source cocoa products from less risky areas such as Indonesia; although these are not currently certified. The Arnott's Group already works closely with suppliers from these areas and is committed to certifying this supply line in coming years to the same standards with Rainforest Alliance.

### Shipping arrangements

In this reporting period, we specifically reviewed our shipping arrangements, recognising that the shipping sector is known to be particularly susceptible to modern slavery risks. As part of this process, we initiated and established a Sedex relationship with our long-term freight forwarder. We also required them to complete a Sedex SAQ, based on which they were determined to be a low-risk supplier. With the Sedex relationship established, we have the ability to monitor modern slavery risks associated with their operations on an ongoing basis.

### Identified high risk suppliers

This year we identified a small number of suppliers as "high risk" based on their completed SAQs. Our Procurement team has prioritised the review of these suppliers to identify the basis for this risk rating, including by making enquiries with the supplier to better understand the specific areas of risk,

**ensuring that corrective actions are implemented for identified non-conformances,**

and requiring that a SMETA audit be undertaken where warranted. If after completing this review, the relevant risks are not or cannot be satisfactorily addressed, these supply arrangements will be terminated in line with our Modern Slavery Guidelines.



## COVID-19 impacts

The COVID-19 pandemic presented some major challenges for The Arnott's Group, including supply shortages and global shipping delays which put pressure on our business. Notwithstanding the difficulties faced,

The Arnott's Group did not waiver in our **commitment to responsible sourcing.**

We are therefore pleased to report that the actions we took to address challenges presented by the pandemic did not pose or result in any increased or additional modern slavery risks in our operations or supply chains. **Two examples of the challenges we faced and how we managed them are:**

### 1. Supplier factory closure.

We respected the difficulties faced by our supplier of coconut in the Philippines who was forced to close its factory due to labour shortages. We supported our supplier in their decision to ensure they kept their workers safe, and we chose to source from an alternative supplier notwithstanding the increased cost of doing so to our business.

### 2. Trans-Tasman freight delays.

We faced significant delays in our Trans-Tasman freight from Australia to New Zealand. These resulted from reduced vessel availability due to global COVID shipping demands in the northern hemisphere. We worked collaboratively with our Trans-Tasman shipping logistics partner to ensure our freight requirements could be more effectively planned to avoid adding to the existing pressures and delays, including by committing to fixed sailing schedules.

Another impact of the pandemic was that we were not able to proceed with our plans to require SMETA audits of any high risk suppliers during this reporting period given the additional pressures on our own resources and limitations on site access. We did, however, allocate funds and resources for this to be done in our next reporting period.





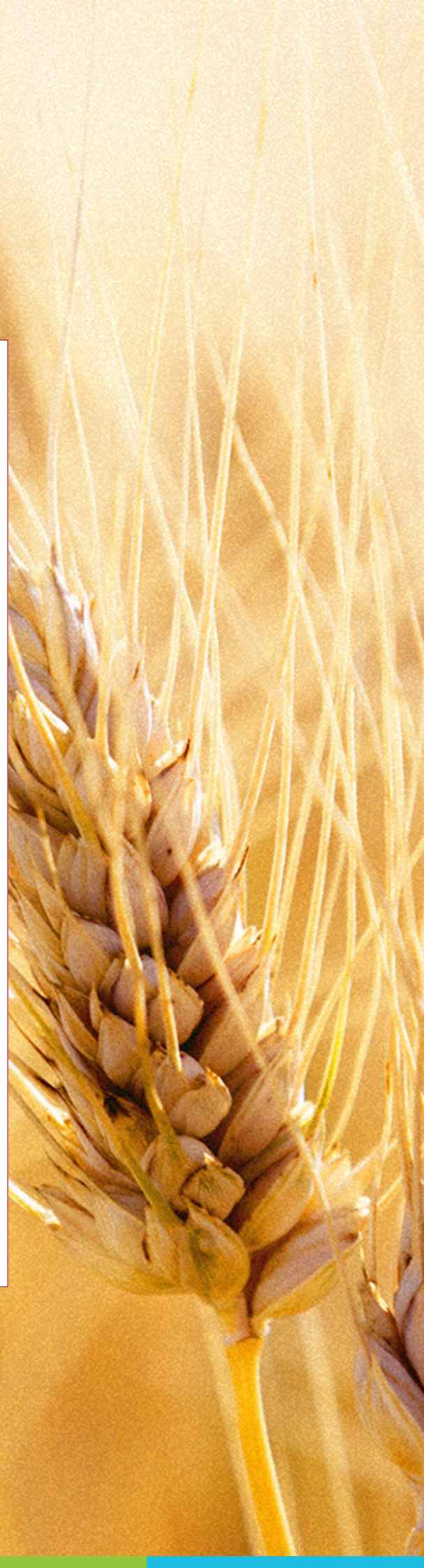
## **SUPPLIER CASE STUDY - ALLIED PINNACLE**

The Arnott's Group is committed to advancing the human rights of our own employees and those of our partners at every junction of the supply chain.

The Arnott's Group spends more on flour each year than any other ingredient, and is the single largest buyer of soft wheat in Australia, a critical input to the baking of our biscuits. The Arnott's Group has proudly sourced its flour locally through Allied Pinnacle for over 100 years. Allied Pinnacle sources wheat from key growing regions across Australia, and provides flour to manufacturers, large and small.

Allied Pinnacle is a member of Sedex, and The Arnott's Group has established a relationship with them on the platform. Through the Sedex platform, we have undertaken an analysis of modern slavery risks at all of Allied Pinnacle's flour mills, and have been able to determine the risk of modern slavery practices at those sites to be low. More specifically, the Sedex platform has allowed us to confirm the absence of any forced labour and child labour violations across the Allied Pinnacle manufacturing sites.

We continue to have a strong partnership with the team at Allied Pinnacle, and are proud to share with them a commitment to operating as an ethical and responsible business.





### 3. Consultation and Approval

# Our modern slavery working group

The Arnott's Group's modern slavery working group has continued to lead our modern slavery elimination efforts. The group is comprised of representatives based at our headquarters in Australia, a representative for our Asia businesses based in Indonesia, and a representative from the Good Food Partners business. Having representatives from all parts of our business in the working group has ensured that we have a comprehensive view of the modern slavery risks across all of The Arnott's Group. It has also facilitated a consistent approach to our risk mitigation efforts within the business – including the implementation of our policy documents, minimum supplier expectations, supplier contract terms and training programs.

# Non-Operating Reporting Entities

Our consultation process did not involve the non-operating entities owned or controlled by the reporting entities. Many of the non-operating reporting entities exist only as holding companies.

# Reporting to the Board

All reporting entities in The Arnott's Group ultimately report to Board of Snacking Investments Holdco. The Board's Audit, Risk and Compliance Committee continues to meet at least four times a year, providing a forum for the reporting of key risks affecting the business. The transparent reporting of these risks empowers the Committee to provide direction on our modern slavery risk management strategy as needed.



## 4. Measuring Our Effectiveness

The Arnott's Group remains committed to uncovering and eliminating all forms of modern slavery in our supply chains. As noted in our previous Modern Slavery Statement, this complex task requires us to meaningfully assess the effectiveness of our actions on reducing modern slavery practices over time.

# The Arnott's Group, excluding Good Food Partners

During the reporting period, we adopted the same key measures of effectiveness as we did for the previous reporting period, being:

## **The number of our suppliers who confirmed their agreement to comply with our RSSC or their equivalent code.**

Of active suppliers of direct product inputs in this reporting period, **98%** had either confirmed agreement to our RSSC or undertaken to comply with their own comparable responsible sourcing code. This is a significant increase from the **82%** in the last reporting period. We are targeting **100%** for the next reporting period and beyond, in line with the minimum supplier commitments mentioned earlier in this statement.

Our businesses in Asia made similarly good progress. Specifically, our RSSC was agreed by:

- ✓ **81%** of packaging suppliers and **87%** of raw material suppliers to our **Indonesia** business (representing 105 of 123 direct material suppliers to the business)
- ✓ **83%** of packaging suppliers and **29%** of ingredient suppliers (representing 57 of 126 direct suppliers) and **100%** of co-manufacturers to our **Malaysian** business, with a goal set to achieve at least **70%** acceptance by ingredient suppliers in the next reporting period

In addition, all new suppliers to our businesses in Asia were required to confirm agreement to our RSSC as a minimum condition of engagement, in line with our Modern Slavery Guidelines.

## **The number of our suppliers who are on the Sedex platform and with whom we have a Sedex relationship.**

As at the end of the reporting period, 94 of the 139 suppliers of direct inputs were Sedex members. Of those, 68 suppliers had accepted our relationship request on the Sedex platform.

As we recognised in our previous Modern Slavery statement, commitments on paper and desktop risk ratings do not always reflect actual risks of modern slavery practices. The audit of our Shepparton site during the reporting period validated the effectiveness of our risk mitigation practices at that site. The completion of SAQs for our other sites in the next reporting period will similarly enable a more accurate assessment of the modern slavery risk mitigation practices of those sites. We will also have greater visibility of any modern slavery risks in our supply chains through the audits of our key suppliers in the next reporting period.

# Good Food Partners

The Good Food Partners business has implemented some of the broader modern slavery actions of The Arnott's Group described in this statement, but also undertook its own comprehensive efforts prior to becoming part of The Arnott's Group. We are proud to note that Good Food Partners completed a Sedex SAQ twice during the reporting period for each of its sites, with no non-compliances identified.



## 5. The Road Ahead

The Arnott's Group is pleased to have followed through on many of the aspirations we set for this reporting period to address modern slavery risks in our operations and supply chains. We remain unwavering in our commitment to continually improve our operations and supply chain processes and practices. In that spirit, we intend to set and achieve further meaningful goals for the next reporting period.

# Some further actions we anticipate include:

- ✓ Reinforcing our internal Modern Slavery Guidelines and Checklist and strengthening processes to ensure they are consistently followed by our people.
- ✓ Completing SAQs for our Australian sites to enable customers to carry out their own modern slavery risk assessment of our business, and continuing Good Food Partners' existing ethical audit program.
- ✓ Continuing to seek express acceptance of our RSSC from, and establish Sedex relationships with, our suppliers, in line with the targets we have set. This includes suppliers to our businesses in Asia.
- ✓ Formalising processes that facilitate the most effective and meaningful use of the Sedex platform, including a process for reviewing supplier SAQs and audit reports to readily identify, and then assess and address specific modern slavery risks.
- ✓ Building a program to require our suppliers to provide annual certification of compliance with our minimum supplier expectations.
- ✓ Requiring our key suppliers to conduct audits of their business to validate their compliance with our responsible sourcing requirements and standards, and to highlight any areas of concern.
- ✓ Engaging with a greater number of suppliers of indirect inputs to our business regarding our responsible sourcing requirements, building on the engagement we have undertaken with suppliers of direct inputs (which to date have been our primary focus). This includes suppliers to our businesses in Asia.
- ✓ Actively promote our whistleblowing platform to The Arnott's Group suppliers as a confidential, anonymous way to report modern slavery concerns in relation to our business.

For more information about The Arnott's Group corporate social responsibility commitments, please visit: <https://www.arnotts.com/our-commitments>.

## APPROVAL

This Statement was approved by the Board of Snacking Investments Holdco Pty Ltd (ACN 634 908 482).





