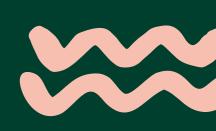






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# Respecting human rights and ensuring ethical practices across our operations and supply chain is a responsibility we take seriously.



We believe that business can be one of the most powerful forces for good in the world. That extends to how we make our products, how we treat our people, and how we conduct business. Beyond adhering to applicable legal, ethical and industry standards, and all relevant laws and regulations, we strive to raise the bar with every decision we make.

Respecting human rights and ensuring ethical practices across our operations and supply chain is a responsibility we take seriously. In 2024, we launched our Responsible Sourcing Program, laying the foundation for a new longterm strategy to identify and manage modern slavery risks in our business. This first year focused on building internal capability, rolling out our new compliance program, and embedding responsible sourcing into how we work through a new governance structure. We established a Responsible Sourcing Working Group, created a Modern Slavery Risk Register, and added formal checkpoints in new vendor and tender processes. We also completed an internal gap assessment to identify improvement opportunities in our operations and expanded our external supplier audit program.

We know there's more to do. We're committed to continuously improving, updating our policies, monitoring suppliers, and engaging more deeply with partners to help protect every worker who supports our business. This statement outlines the progress we made in 2024.

#### 2024 Highlights

- · Finalised and embedded the new Responsible Sourcing Program
- Recruited our first dedicated full-time resource to drive our Program
- Created a governance framework including the Responsible Sourcing Working Group
- Achieved SEDEX compliance for all high-risk Direct suppliers of ingredients and packaging

### **Scott Hadley**

Managing Director Australia/New Zealand Chobani Pty Ltd

## **About Chobani**

Chobani is a subsidiary of Chobani Global Holdings, LLC, a limited liability company formed in Delaware in the USA, with its headquarters in New Berlin, New York. Chobani Global Holdings, LLC has its own products and ingredients which are separately formulated, sourced, and manufactured. Its products are manufactured in the USA and are currently distributed in North, South and Latin American markets.

Founded by Hamdi Ulukaya, Chobani (a privately held company) made its mark in Australia in 2011 with the acquisition of Victorian dairy company Bead Foods. In November 2011 the first pot of Chobani yogurt, which was flown in from the USA, was sold in Australia. Subsequently, local production kicked off in our Dandenong South (Victoria) factory in August 2012. Chobani operations in Australia are therefore largely standalone from our US parent and the products we produce are made using materials we source within our own supply chain.

You can find our Chobani and Gippsland Dairy products on the shelves of major retailers across Australia, including Woolworths and Coles, as well as in independent retailers and foodservice establishments. Additionally, our reach extends beyond Australian borders, with exports throughout Asia-Pacific markets, including New Zealand, China, Singapore, Hong Kong, Thailand, Malaysia, Indonesia, Vietnam, the Philippines, Taiwan, New Caledonia, and the Maldives.

While this Statement outlines our efforts to do good in our operations and supply chain, we're also in the business of making a difference. We believe that good food is a right, not a privilege, and we're committed to using our partnerships, influence, and resources to make nutritious food more accessible. Here's what we did in 2024.



## **Responsible Sourcing at Chobani**

Our sustainability strategy guides us in improving how we operate, source goods, and design our packaging, to reduce our environmental footprint and support the protection of human rights in our operations and supply chain. We acknowledge that true sustainability progress takes time, collaboration, and continuous improvement, and we are committed to this journey. We partner with suppliers, customers, and stakeholders to develop and deliver solutions for people and planet. Our sustainability program revolves around four fundamental pillars: sustainable packaging, responsible operations, energy and emissions, and responsible sourcing. It is within our responsible sourcing pillar that our business focuses its efforts to identify and manage risks of modern slavery, as further detailed throughout this Statement.

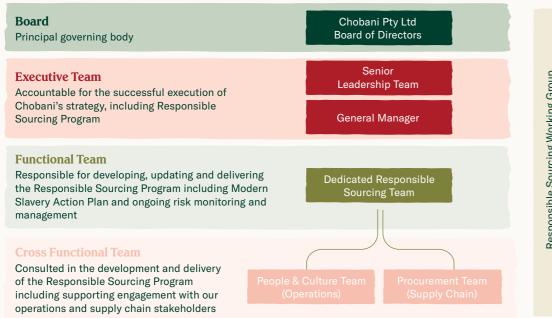
#### Governance Framework

While everyone has a part to play in responsible sourcing, overall day-to-day responsibility sits with our Environment, Social and Governance team ("ESG"), who:

- oversee the implementation of the Responsible Sourcing Program (the "Program"); and
- · report progress through to the relevant General Manager, and in turn, to the Executive Team and Board.

Our ESG team, specifically our dedicated responsible sourcing employees, work with the broader business to embed the program into practices and systems, and to elevate our enterprise capability to understand risks and improve outcomes in both our operations and supply chain.

#### Figure 1: Responsible Sourcing Governance



# Sourcing Working Group internal staff levels to support implementation Responsible progress and

Working

Group

A broad

team of

at different

of the

Sourcing

Program,

monitoring

keeping us

on-track.

## **Embedding Responsible Sourcing as BAU**

The wider Chobani team plays a significant role in delivering our Program and they are supported with appropriate training and guidance, and are equipped with the knowledge and tools they need to recognise risks of modern slavery. To support this, for the first time, our Procurement team's 2024 Key Performance Indicators included measurable responsible sourcing targets.

## **Human Rights & Modern Slavery**

Human rights describe a broad set of inherent freedoms and universal rights afforded to all individuals, regardless of their race, location, or circumstance. Serious violations of these rights, where individuals are deprived of their fundamental freedoms and are subjected to exploitation, are examples of modern slavery.

'Modern slavery' is an umbrella term used to describe a range of practices that seriously exploit individuals for the purpose of personal or commercial gain. While there is no globally agreed definition of 'modern slavery', the Modern Slavery Act 2018 (Cth) has defined modern slavery in reference to domestic criminal law legislation and international instruments as including the following types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services; and worst forms of child labour, where children are subjected to slavery or similar practices, or engaged in hazardous work.

### Salient Human Rights Risks

Prior to the reporting period, we conducted a risk assessment to evaluate our suppliers for modern slavery risks by analysing various factors such as geography, industry, sector, and supply chain tier. During the reporting period, we utilised the results from this risk assessment to prioritise our efforts where they can have the greatest impact. Further details of our risks are provided in the 'Risks: Our Operations' and 'Risks: Our Supply Chain' sections of this Statement.

Our salient human rights risks are those with the most severe actual and potential impacts on human rights associated with our activities and business relationships. As a dairy business, these risks relate to the operation of production facilities supported by both permanent and temporary workers, and the sourcing of goods and services from complex local and global supply chains.

These risks are identified based on their severity, likelihood of occurrence, and the potential harm to people and communities. Understanding and addressing these risks is central to our strategy for preventing modern slavery and promoting ethical practices throughout our operations and supply chain. We detail these risks, including our approach to managing them and the effectiveness of these controls, throughout this Statement.

#### Our most salient human rights risks



**Forced** Labour



**Child** Labour



**Migrant Worker Exploitation** 



Health & **Safety Risks** 



**Land Rights Impacts** 





## **Structure: Operations Overview**

Our core business is producing and distributing yogurt under the Chobani and Gippsland Dairy brands. Our mission has always been about making better food for more people, and we do this by making delicious, nutritious, natural products, and ensuring they are widely accessible to different consumers, in different markets, and through different channels. The thriving manufacturing hub of Dandenong South has been our home since day one, and all our operations, including production, distribution, commercial, and administration are centralised at this site.

#### **Our Team**

Our dedicated team bring together expertise spanning manufacturing, logistics, operations, project management, research and development, quality and food safety, ESG, sales and marketing, as well as corporate support functions of legal, strategy, finance, IT, people & culture, and communications. Operating within the framework of all relevant laws, integrity is paramount in everything we do. Our team is engaged with clear and comprehensive contracts in line with National Employment Standards under the *Fair Work Act 2009 (Cth)* and/or applicable industry awards and requirements.

As of 31 December 2024, Chobani had 291 total employees, all of whom were employed in Australia. Of these employees:

- 276 are permanent full-time employees
- 15 are permanent part time employees
- 57 are union members

To manage fluctuations in demand and resourcing gaps, at times we engage contract workers through reputable third-party labour providers.



## **Risks: Our Operations**

We recognise modern slavery is a serious issue that can impact various sectors and geographies, including our operations in Australia. As part of our ongoing risk management process, we identified key areas where the potential for modern slavery may exist. This involved evaluating factors such as:

- The nature of the work
- Worker types (directly hired by Chobani, or through labour agencies)
- Employment arrangements
- Geographic and sector-specific risks

According to Walk Free's 2023 Global Slavery Index, which assesses countries based on prevalence of modern slavey, vulnerability to modern slavery, and government response, Australia is considered low risk. The Index notes that Australia has the lowest vulnerability to modern slavery in the Asia-Pacific region, so our operations risks are comparatively low compared to those in our supply chain.

While the overall risk is low, potential areas of vulnerability in our operations include workers engaged through labour hire, outsourced services (such as cleaning), and freight providers. While the direct risk of modern slavery in our own operations is considered low, we recognise that visibility over third-party employment practices may be limited, especially where subcontracting is involved, and this is one area we have focused our efforts in 2024.

Risks and controls relating to labour hire are considered in 'Our Operations' while those relating to other services and freight providers are considered in 'Our Supply Chain'.

#### **Labour Hire**

We engage a proportion of workers through ongoing labour providers to meet our short terms needs. In our operations, this labour carries an inherently higher risk of modern slavery. This workforce is often characterised by a higher proportion of migrant and lower skilled workers who may be less aware of their workplace rights. The labour hire industry also engages in higher-risk business practices such as subcontracting which can obscure visibility over employment conditions.

Labour hire arrangements introduce additional risk where:

- Workers are migrants or on temporary visas
- Language barriers and visa conditions reduce awareness of rights
- Workers are underpaid or subject to illegal deductions
- There is low visibility over contracts or living conditions

This makes labour hire workers easy targets for exploitation, including forced labour or underpayment. Workers may be paid less than the legal minimum wage or denied their entitlements such as overtime pay, holiday pay, or superannuation. Some workers might also face illegal deductions from their wages for accommodation or transport, which are often not clearly disclosed in worker contracts. These practices can lead to financial hardship and can be considered a form of exploitation.



## **Actions: Our Human Rights Approach**

Chobani has a thorough set of workplace policies, accessible via our intranet platform and displayed throughout our operations, to ensure transparency, worker wellbeing, and clear grievance pathways. Regular team training, responsible labour provider management processes, and risk management and mitigation tools such as the Sedex Ethical Data Exchange (SEDEX) platform support our ongoing risk assessment and ethical practices. Additionally, third-party reviews and external audits, including Roundtable on Sustainable Palm Oil (RSPO), SEDEX Member Ethical Audit (SMETA), and fire safety assessments, reinforce Chobani's commitment to continuous improvement, regulatory compliance, and modern slavery risk mitigation.



## **Our Policies**

We maintain a comprehensive suite of policies that are accessible to all internal team members via our intranet and are prominently displayed across operational areas for visibility to labour hire workers and on-site contractors. These policies communicate our expectations around human rights, workplace conduct, and safety, and are designed to empower all workers, regardless of employment type, to raise concerns or grievances safely and confidentially.

Our policies play a critical role in mitigating modern slavery risks by promoting safe, respectful, and inclusive working environments, and ensuring that workers have accessible channels to report issues without fear of retaliation. These protections help to prevent exploitation and support early detection of potential human rights breaches.

The key policies that support this framework include:

- **Grievance Policy** Outlining clear processes for reporting workplace concerns
- **Whistleblower Policy** Ensuring workers and the broader community can confidentially report unethical or unlawful conduct
- **Bullying, Harassment & Discrimination Policy** Setting standards for respectful behaviour and zero tolerance of abuse or intimidation
- **Domestic & Family Violence Leave Policy** Supporting workers experiencing family or domestic violence

These policies not only strengthen protections within our own operations but also reflect the standards we expect our suppliers and other business partners to uphold.

- · Mental Health Policy Promoting a psychologically safe and supportive workplace
- Safety & Wellbeing Policy Ensuring physical health and safety is prioritised

Reinforcing our commitment to a safe and respectful work environment



Internal training is a key area of our Program that helps to build capability of our staff to address modern slavery risks and support improved management controls. In 2024, we engaged a local consulting firm, Fair Supply, to develop two training sessions focused on modern slavery in the current domestic and global landscape, Chobani's risk exposure, responsible purchasing practices, and risks in our priority ingredients. This training was developed in 2024 and delivered after the reporting period, in February 2025, to our Executive Team and other applicable staff within the business.



## Labour Provider Management

Our Labour Provider Management process includes verification and annual reviews of labour providers license numbers, certifications, grievance mechanism & remediation processes, working hours management, supplier due diligence processes, and working rights verification processes. This process, new in 2024, was developed in response to address the elevated risks identified in our temporary labour workforce.



# Annual Self-Assessment Questionnaire (SAQ)

We leverage the SEDEX platform to demonstrate transparency with our customers and to enhance our understanding of our own operational risks and opportunities, including those related to modern slavery. As part of this, we annually update our Self-Assessment Questionnaire (SAQ), a key tool that helps us monitor and assess potential human rights and labour rights risks within our operations. The SAQ evaluates our practices across a range of categories, including labour standards, health and safety, business ethics, and environmental management. By regularly reviewing and updating this information, we are better able to identify gaps, track our progress, and implement improvements that reduce the risk of modern slavery.





## **External Audits**

To ensure we are operating in compliance with relevant standards, regulations, and stakeholder expectations, we undertook a series of external audits in 2024. These audits not only tested the strength of our systems but also identified areas for improvement in our approach to ethical business conduct and modern slavery risk management. Each of these audits supports our broader commitment to ethical business practices and safe working conditions, and plays a key role in identifying risks, and driving continuous improvement.

#### Table 1. 2024 Internal Audits

Audit	Summary	Salient human rights risk assessed
SMETA Gap Analysis	We undertook a multi-day SMETA Gap Analysis conducted by a British Standards Institution (BSI) auditor. Our performance was evaluated across four pillars: labour standards, health and safety, environmental impact, and business ethics. The insights gained helped us to identify risks and begin implementing new controls to strengthen protection for workers and improve ethical compliance.	Forced Labour Child Labour Migrant Worker Exploitation Health & Safety Risks
RSPO Audit	We underwent a RSPO Supply Chain Certification audit conducted by conducted by a BSI auditor. This audit assessed our compliance with the 'mass balance' RSPO standard, which includes criteria around traceability, transparency, and ethical sourcing. By meeting RSPO's requirements, we help ensure our palm oil supply does not contribute to deforestation, environmental degradation, or labour exploitation; issues closely linked to modern slavery risks. It also reinforces our due diligence practices for high-risk commodities and suppliers.	Forced Labour Child Labour Migrant Worker Exploitation Land Rights Impacts
Fire Safety Audit	Fire Rescue Victoria assessed our site for fire safety preparedness, identify potential hazards, evaluate the effectiveness of safety systems, and ensure compliance with relevant fire regulations. Following the audit, we invested in a new Emergency Warning and Intercommunication System (EWIS) throughout the manufacturing areas of our site. This system enhances site-wide communication and supports safe and orderly evacuations, important for safeguarding all workers, including those in potentially vulnerable labour arrangements.	Health & Safety Risks
Health, Safety, Environment Audit	Delivered by local consultants Enviro Essentials, this audit assessed our safety and environmental performance and compliance with relevant local, State and Commonwealth laws. A safer and more accountable work environment directly contributes to the prevention of exploitation, particularly for vulnerable workers. Following this audit, we commenced development of a formal Environmental	Health & Safety Risks

Management System aligned with ISO 14001, to be implemented

in 2025.



## Payroll and Bank Account Name Verification

Domestic financial abuse is a form of financial control and manipulation that occurs within an intimate or family relationship, where one person uses money and financial resources to exert power, control, or coercion over another. In some cases, this form of control can be an indicator of modern slavery, particularly where individuals are being forced to work while others retain control over their earnings. Financial abuse may also signal broader vulnerabilities, including coercion, dependency, or restriction of freedom, conditions that increase the risk of exploitation.

To help identify and prevent this type of abuse within our workforce, we introduced a bank account name verification process in 2024. This exercise involves members of our Finance and People & Culture teams checking that the bank account name provided by each employee matches their own name, confirming that individuals are receiving their wages directly and are in control of their income. This crosscheck is a simple but important safeguard that helps us detect signs of financial control or coercion and supports our broader commitment to respecting human rights and preventing modern slavery. The verification process will be conducted at least once annually, and findings will inform any necessary follow-up or support for affected individuals.



Chobani Modern Slavery Statement 2024

#### **Grievance Mechanism**

We support an environment where everyone feels safe and empowered to speak up about any actual or suspected misconduct without fear of retaliation. Whether the concern relates to unethical or unlawful conduct, or simply behaviour that does not align with our policies, values, or expectations, we want to hear about it so we can take appropriate action.

Our Grievance Mechanism plays an essential role in our modern slavery risk management framework. It provides a clear, accessible process for raising and resolving workplace concerns, including those that may indicate risks of modern slavery, such as excessive working hours, underpayment, unsafe working conditions, coercion, or restrictions on freedom of movement. The policy applies to all workers including employees, contractors, and casual staff, and is introduced during onboarding, prominently displayed on noticeboards across our site, and accessible via our intranet. We also reinforce awareness of the grievance process during regular training sessions, One-Point Lessons, and Toolbox Talks to ensure that workers understand how to use the mechanism and feel supported in doing so. By maintaining a trusted and well-communicated grievance process, we aim to ensure that any early indicators of exploitation or harm can be surfaced and addressed promptly, strengthening our ability to respond to modern slavery risks.

### **Whistleblower Policy**

The Chobani Whistleblower Policy is a formal mechanism that allows employees, contractors, their families, and the community to report unethical, illegal, or harmful behaviour or practices within our organisation, without fear of retaliation.

When a concern has been raised with us, we take it seriously. Here's how it worked in 2024:

**Figure 2: Our Whistleblower Process** 

### **Whistleblower Process**

#### **Initial Review**

Whistleblower Committee will take a first look at what you have told us.



#### Investigation

If your report needs more investigation, an Investigations Officer will be assigned to the case.



## **Staying in touch**If you have told us

who you are, you
will be assigned
a Whistleblower
Protection Officer.
This person will get
in touch to walk you
through what happens
next. They will talk about
how we will investigate
and who we might need
to speak to.



there to look out for you. They will make sure you are treated fairly and keep things confidential if that's what you want. If you feel like you are being badly treated because you spoke up, they are the ones who will help.

Your protection

This person is also

Reports of suspected wrongdoing may be brought to our attention via our fully outsourced independent Whistleblower service that operates 24 hours a day, 7 days per week.



To report a concern, call NAVEX toll-free within Australia on **1800 319 524** or use the Ethics Point online portal at **chobani.ethicspoint.com**.



## **Assessment: Effectiveness of our Efforts**

To ensure our approach is effective, we use a range of assessment and review mechanisms. In 2024, these included ongoing monitoring of labour practices within any outsourced services, evaluating whether policies are being followed in practice, whether staff understand and act on modern slavery protocols, and whether any identified risks have been appropriately addressed or remediated. This allows us to monitor and strengthen our approach and support continuous improvement.

Table 2: How we Assessed the Effectiveness of our Efforts

Focus Area	What we aim towards	2024 Outcomes
Policies	Periodically review policies and respond to changing local and global contexts in modern slavery and responsible sourcing.	The following policies were updated  - Whistleblower Policy  - Sexual Harassment Policy  - Bullying, Harassment and Discrimination Policy  - Domestic & Family Violence Leave Policy  - Supplier Code of Conduct (published early 2025)  - Ethical Sourcing Policy
Payroll	Annual audit to verify all bank accounts receiving Chobani wages match the name of the team member, with any discrepancies investigated to ensure no team members is at risk of domestic financial abuse.	2 incidences identified of employee bank account names not matching the employee's name. After an investigation by the People & Culture team, it was confirmed there was no incidents of domestic financial abuse.
Training	Provide capability building trainings to boost staff preparedness to identify and manage modern slavery risks and indicators in our operations and supply chain.	<ul> <li>189 employees attended respect at work training</li> <li>17 employees attended RSPO training</li> <li>10 employees attended Responsible Sourcing Working Group Sessions</li> </ul>
Whistleblower	Provide a mechanism for internal and external stakeholders to anonymously raise concerns regarding misconduct at Chobani.	O instances reported.
SEDEX SAQ	Update our SEDEX self-assessment questionnaire every 12-months.	Updated to include new policies and processes.
Third-party review	Engage a third party to review our operational performance in human rights to an industry standard.	SMETA gap analysis identified several potential non-conformances to the standard, which informed our corrective action plan, resulting in improved outcomes.

Choban

# **Our Supply Chain**



Structure



Risks



Actions



Assessment



## **Structure: Supply Chain Overview**

We source goods and services directly from a range of businesses. These businesses, in turn, rely on their own suppliers further down the supply chain - companies we typically do not have a direct relationship with. We refer to our suppliers as follows:

- **Direct (Tier 1) suppliers** are those we engaged with directly during the reporting period. This includes both ongoing suppliers and those involved in one-off transactions. In 2024, we worked with 38 suppliers of goods for resale, like food and packaging, and 534 suppliers of services and goods not for resale, like freight and cleaning.
- 2+ Indirect (Tier 2+) suppliers are those who supply goods to our Tier 1 suppliers. While we don't contract with them directly, their products may ultimately become part of what we offer. For example, fruit might be harvested, processed, and then supplied to one of our Tier 1 partners, who turn it into a raw ingredient we use in our yogurts.

Through our Program, in 2024 we have gained greater visibility into the origins of priority materials deeper within our supply chain - beyond our Tier 1 suppliers. This enhanced transparency allows us to better understand potential human rights risks in specific regions, helping to focus and strengthen our due diligence efforts.

Figure 3 shows the locations of our Tier 1 (Direct) suppliers engaged in 2024. It also highlights indicative regions where priority materials may originate from deeper within our supply chain (Tier 2+), based on insights gained through our supply chain mapping efforts.

Figure 3: Map of our Direct and priority Indirect suppliers



Note: the inclusion of a Tier 2+ country on this map does not guarantee sourcing activity occurred there in 2024, or that no priority materials have been sourced from other countries not listed (Tier 2+) in the reporting period. Year-to-year procurement can vary due to factors such as seasonality, agricultural yield, and broader supply chain constraints. The map is intended to provide specific information on where Chobani's Direct purchases were made in the reporting period, and general guidance on where priority ingredients may originate from, beyond Tier 1, over the course of the year, based on the best available information.

## **Risks: Our Supply Chain**

Modern slavery risks in the food manufacturing sector can arise at various points in the supply chain, particularly in regions with weak labour protections, limited enforcement, or where complex and opaque supply chains create conditions for worker exploitation.

In 2023, prior to the current reporting period, we developed a supplier risk matrix (Table 3). This was informed by a third-party assessment of our supply chains, which considered a range of factors including geographic risks related to where we source ingredients, inherent risks across supply chain stages such as farming and manufacturing, and specific risks linked to businesses operating within our supply chain. Further details on our earlier risk assessment process are provided in our 2023 Modern Slavery Statement.

#### Table 3: Our Supplier Risk Matrix

#### **High-risk Industries**

- · food & agriculture
- renewable energy
- textiles, clothing, and footwear
- · labour hire

#### Medium-risk Industries

- cleaning
- packaging
- transport
- chemicals
- electronics
- repairs / maintenance
- · construction
- manufacturing
- machinery
- waste & recycling services
- cultures and enzymes
- third-party logistics services with off-shore workers

#### Low-risk Industries

- food products oats
- professional and research services
- government services
- education providers
- post and telco services
- building leases (Australia)
- · utilities services

In 2024, we continued to refine our understanding of risk through a multi-step approach that included:

- Product-level analysis based on procurement volumes, country of origin, and known risk factors associated with highrisk areas - such as the prevalence of child labour or forced labour in specific sectors.
- Supply chain mapping for priority ingredients, including targeted visibility meetings with Direct suppliers. These meetings were structured to request deeper disclosure on ingredient origins including the specific locations of farming, harvesting, or processing activities. We also sought to understand whether subcontracting or sourcing from high-risk geographies was occurring. During the reporting period, we engaged in multiple disclosure requests related to these priority ingredients. This work is ongoing and will continue to evolve in 2025, as we further explore our extended supply chains to enhance visibility, identify potential risks, and strengthen our modern slavery risk management efforts.
- · Analysis of third-party risk data, including:
  - SEDEX Self-Assessment Questionnaires (SAQs) and corresponding risk ratings;
  - Global Slavery Index (GSI) country risk ratings to assess geographic exposure;
  - Independent third-party audit reports (e.g. SMETA, RSPO); and
  - Media alerts that flag potential supply chain issues or supplier practices.

We also assessed sector-specific risks, such as labour exploitation during harvest in horticulture, as well as supplier-specific factors, including governance practices, transparency, and audit histories.

Our 2024 risk assessments strengthened our understanding of risks across products, ingredients, and services, enabling more targeted monitoring and risk management efforts.





## **High-risk Ingredients**

In 2024, we developed a prioritised list of food ingredients requiring enhanced monitoring and management. These included:



Palm oil









We source these ingredients from high-risk regions including parts of Asia and Africa - specifically, Vietnam, Malaysia, Thailand, Cote d'Ivoire, Indonesia, Madagascar, and China. According to the Global Slavery Index, these areas have a medium to high prevalence of modern slavery and worker vulnerability to exploitation.

## **High-risk Services**

During the reporting period, we also identified elevated modern slavery risks linked to certain service providers that support our operations - particularly in cleaning and freight services. These service categories are inherently higher risk due to a greater reliance on migrant and lower-skilled workers who may have limited awareness of their rights, as well as business practices such as subcontracting, which can reduce oversight and increase exposure to exploitation.



## **High-risk Areas**

#### **Dairy**

Dairy represents our largest ingredient spend and is sourced through a broker from multiple regions across Australia, primarily in Victoria. In 2024, we initiated focused engagement with both our broker and our primary dairy supplier, including in-person meetings at our offices and site visits to farms, to better understand potential modern slavery risks within Victorian dairy supply chains. These discussions identified the use of migrant and visa workers as a key area of concern, particularly in relation to risks of underpayment, excessive working hours, and limited oversight of labour hire arrangements. These factors contribute to dairy being considered a high-risk category. We acknowledge that deeper visibility and ongoing due diligence are needed to fully understand and address these risks and strengthening our engagement on labour practices in dairy will be a key focus for 2025.



#### **Palm Oil**

The palm oil industry presents significant modern slavery risks due to the prevalence of migrant labour, land grabs, exploitative recruitment practices, poor working and living conditions, and complex and opaque supply chains.



#### Cocoa

The cocoa industry is highly vulnerable to modern slavery due to the prevalence of child labour, forced labour, land grabs, exploitative working conditions, and weak enforcement of labour laws. The industry's reliance on migrant and impoverished workers, combined with low wages and poor living conditions, makes it a significant risk for human rights abuses.



#### Stevia

The stevia industry is susceptible to modern slavery risks, primarily due to the reliance on low-wage labour, including child labour and migrant workers, as well as the prevalence of debt bondage and poor working conditions. Workers in the industry face significant challenges, including low wages, unsafe working conditions, and lack of access to support.



#### Vanilla

The vanilla industry is a high risk of modern slavery due to exploitation of vulnerable workers, debt bondage, as well as the labour-intensive cultivation and processing of the vanilla.



#### **Textiles**

Workers in the textiles industry are vulnerable to forced labour, wage theft, hazardous conditions, and illegal overtime, as well as garment supply chains often operating in high-risk locations.



#### **Cleaning Services**

The cleaning industry in Australia is considered high-risk for labour exploitation, with modern slavery practices often involving complicated subcontracting, withholding wages, immigration-related threats, excessive working hours, deceptive recruitment, debt bondage, and unsafe working conditions.



#### **Freight Services**

The freight sector's complex, multi-tiered supply chains and widespread use of subcontracting create a high risk of modern slavery, particularly for migrant and subcontracted workers. Limited oversight can lead to poor working conditions and exploitation. The freight industry also exhibits health and safety risks requiring sufficient policies and processes such as driver fatigue management.



Our risk identification processes are iterative, and we continue to monitor emerging issues through ongoing supplier engagement, audit outcomes, and global risk alerts. This allows us to tailor our modern slavery approach to monitor and manage the highest areas of risk.

Chobani Modern Slavery Statement 2024

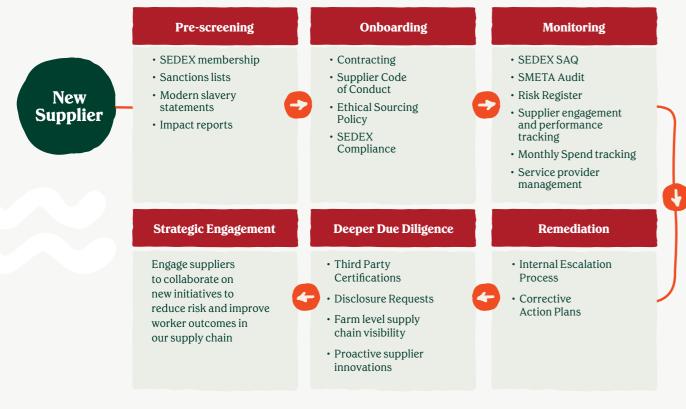
## **Actions: Our Human Rights Approach**

Our Responsible Sourcing Program was designed to ensure our supply chain operates ethically, sustainably, and in compliance with human rights, environmental, and regulatory requirements. It aims to integrate responsible sourcing practices into the procurement process and beyond, ensuring this thinking is considered from the onset of supplier sourcing and onboarding.

Based on our initial risk assessments, the Program follows a multi-tiered approach in our supply chain that begins before we engage with a supplier and continues through ongoing risk monitoring and compliance management. It also includes deeper due diligence in our priority areas and the development of strategic initiatives. This approach enables our business to identify and understand risks in our supply chain, implement appropriate controls, and design initiatives that not only reduce harm but, as the Program evolves, also have the potential to create meaningful, positive impact for the workers and communities within our supply chain.

The results of our approach are detailed in Table 4.

Figure 4: Our Supplier Responsible Sourcing Program Framework



### **Pre-screening**

Each new supplier is reviewed for risk based on their geographic location, sector, and product or service provided. The supplier's ethical sourcing practices are reviewed including their policies, grievance mechanisms, supply chain due diligence, certifications, and industry memberships. If available, the supplier's modern slavey statements and sustainability reports are reviewed for further details on how they manage their ESG risks including their modern slavery risks in their operations and supply chain. All new suppliers must be reviewed and endorsed by our internal Responsible Sourcing Team.

When a category of goods or services are procured by way of tender, bidding suppliers are required to complete an ESG questionnaire ensuring responsible sourcing and modern slavery considerations are meaningfully integrated into the vendor selection process. The questions range from a supplier's environmental performance through to their use of migrant and visa workers, and our ESG assessment directly (amongst other considerations) informs the ultimate selection of the vendor(s) to whom tenders are awarded. In 2024 this process was implemented through several major tenders, including waste management, freight/logistics, and packaging.



## **Onboarding**

Once new suppliers are approved, we have a range of tools to onboard them into our Responsible Sourcing Program.

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

In collaboration with our US parent, we have a global Supplier Code of Conduct (the "**Code**"). The Code specifically applies to suppliers of Chobani Pty Ltd who are required to comply with relevant laws, human rights and labour standards, business ethics and environmental practices, including having ethical and responsible sourcing programs.

The Code was updated in 2024 and published in early 2025 to reflect evolving local and global contexts.



In line with the International Labour Organization's Employer Pays Principle, a key addition to our updated Code was the Migrant Worker clause. This clause specifies compliance with the Employer Pays Principle, where no worker should be required to pay recruitment costs to secure or retain their employment.



During onboarding, new suppliers are now contractually required to sign and agree to our Supplier Code of Conduct and Ethical Sourcing Policy. A key step in these documents and this process is SEDEX compliance. Suppliers are required to register with SEDEX, a globally recognised supplier ethical data exchange platform, and complete a Self-Assessment Questionnaire (SAQ), which they must then update every 12 months. Importantly, this allows us to monitor specific risks associated with linked supplier sites, so we can act if required (see: "Monitoring" below).



**100% of all High-risk Direct suppliers** were SEDEX compliant at December 31, 2024.



### Contracting

Our new supplier contracts include clauses dedicated to compliance with our Supplier Code of Conduct, Ethical Sourcing Policy, *The Modern Slavery Act 2018 (Cth)* and other common modern slavery standards. Where specific risks are identified during pre-screening, our legal team may work with suppliers to develop specific contractual clauses to better control those risks. For example, through our freight tender process, we identified a risk relating to the high use of subcontracting in the freight industry and national chain of responsibility requirements. To help better manage these risks, clauses were included in the final freight contracts detailing our requirements for visibility and compliance in these areas.

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### **Monitoring**

Once onboarded, we have several tools to help monitor compliance with our Program.



#### **SEDEX SAQ Review**

A key component of our supplier monitoring is reviewing responses to the SEDEX Self-Assessment Questionnaire (SAQ), which covers key areas including labour standards, health and safety, business ethics, and environmental management. In 2024, we reviewed SAQs from 41 suppliers. While no immediate modern slavery indicators were identified, the process significantly improved our visibility into workforce characteristics across our supply chain - such as the number of workers, gender breakdown, and the use of migrant labour, including workers' home countries. Where migrant workers were disclosed, we followed up with suppliers to confirm that no recruitment fees had been charged. These insights help us better understand potential areas of risk and identify opportunities for further engagement or improvement over time.



#### Third-party auditing

We utilise third-party SMETA audit reports available through the SEDEX platform to monitor and assess suppliers' ethical performance. These audits provide insights into our suppliers' labour practices, health and safety, and other indicators of modern slavery risk. We regularly review available reports as part of our due diligence process to help identify potential issues and track improvements over time. The primary goal is to ensure that our suppliers meet Chobani's standards and comply with both local and international regulations related to ethical business practices, as well as to our Supplier Code of Conduct. Through the Ethical Sourcing Policy, Chobani reserves the right to audits its suppliers, for example if elevated risks are identified through the SEDEX SAQ.



#### **Risk Register**

Our new Modern Slavery Risk Register is regularly updated and enables the business to monitor emerging risks by country, industry, commodity, the impact likelihood, and the effectiveness of current mitigation controls. In 2024, a potential forced labour risk was identified in the supply chains of plastic protective gloves manufactured in Malaysia. Our team investigated the issue and confirmed that Chobani's gloves were sourced from Thailand and were not related to the identified issue. The risk assessment and key learnings were documented and shared with the Responsible Sourcing Working Group.



## Supplier Performance and Engagement Tracking

We monitor supplier performance using SEDEX risk scores, audit outcomes, certifications, and self-reported initiatives, consolidated in our Supplier Performance Tracker. This helps us prioritise engagement and identify areas for improvement.

In 2024, we also met with key suppliers across our milk, fruit, packaging, and raw materials categories. Site visits provided insight into recruitment practices, working conditions, and subcontracting - particularly beyond Tier 1, where visibility drops. For example, a meeting with a Tier 2 vanilla supplier revealed strong human rights practices, allowing us to deprioritise vanilla for further due diligence.

Combining performance monitoring with direct engagement strengthens our risk management approach and supports capability building in our supply chain.



### **Monthly Spend Monitoring**

To ensure the effectiveness of our vendor onboarding process and maintain oversight of procurement activity, our Finance team provides a monthly company spend report to the Responsible Sourcing team. This allows us to cross-check that all new or active suppliers have undergone the required due diligence, including human rights and modern slavery risk screening. This step is critical for modern slavery risk management as it helps identify any suppliers that may have been engaged outside of formal onboarding processes, which could result in gaps in risk assessment, contractual commitments,

or supplier accountability. By monitoring spend data regularly, we can promptly detect and investigate any unvetted supplier relationships, ensuring all vendors meet our ethical sourcing standards from the outset and that no part of our supply chain falls outside our risk management framework. During the reporting period, we identified several instances where suppliers were approved without completing the new pre-screening process. This finding supported follow-up training to reinforce understanding and compliance with the updated procedures.



O Chobani Modern Slavery Statement 2024

#### Chobani Modern Slavery Statement 2024

#### Remediation

Our remediation framework, developed in 2024 and rolling out in 2025, outlines the steps we take to respond to indicators or instances of modern slavery in our supply chain. This includes addressing non-conformances flagged in third-party audits related to labour standards or human rights.

The framework ensures a structured and proportionate response - starting with investigation, followed by corrective action in collaboration with the supplier, and ongoing monitoring to ensure remediation. It reinforces our Supplier Code of Conduct by holding suppliers accountable for maintaining safe, fair, and lawful working conditions. By linking remediation to both our monitoring systems and contractual expectations, we strengthen supply chain accountability and support continuous improvement.

Beyond remediating individual cases, the process is designed to build supplier capability and promote long-term improvements in labour practices across our supply chain.

#### **Internal Escalation Process**

Our internal escalation process sets out how we respond when indicators of modern slavery are detected - whether through Chobani team members, audits, SEDEX SAQs, supplier disclosures, media, social media, community concerns, or grievance mechanisms. The process supports a timely, transparent, and consistent response and includes:

- Detection and investigation
- Initial remediation response
- · Corrective action planning (if required)
- Business review and decision (if required)

#### **Corrective Action Plan**

Where remediation is required, a Corrective Action Plan (CAP) will be developed in consultation with the supplier. Each plan should be tailored to the specific issue and context, considering factors such as the severity of harm, local operating conditions, and appropriate remediation timeframes. The goal is to address the root cause, prevent recurrence, and support affected workers in a meaningful and sustainable way.

## **Deeper Due Diligence**

For priority ingredients and high-risk services, the Program commits us to undertake deeper due diligence activities, directing our efforts where they can have the most meaningful impact. These activities include exploring relevant third-party certifications, issuing targeted disclosure requests, conducting comprehensive supply chain mapping, and inviting suppliers to propose proactive solutions that advance human rights and broader sustainability outcomes.

#### **Third-Party Certification**

Our due diligence includes third-party certification of high-risk ingredients and services, where appropriate and available. Chobani currently has third-party certifications for palm oil, wood fibre, and labour hire in place. We plan to continue exploring new or elevated third-party certifications for priority ingredients in 2025.



#### **CASE STUDY Labour Hire**

Chobani's labour hire provider is StaffSure certified - an independent accreditation developed by the Recruitment, Consulting & Staffing Association (RCSA). StaffSure promotes integrity and compliance in the workforce services industry across Australia and New Zealand, ensuring that labour hire providers operate legally, ethically, and transparently.

#### **Targeted Disclosure Requests**

Targeted disclosure requests are a key tool in how we assess and manage modern slavery risks in our supply chain. When elevated risks are identified, such as sourcing from high-risk geographies or complex supply chain structures, we may request specific information from suppliers relating to labour practices, material origin, recruitment processes, or subcontracting arrangements. These requests enable us to gather clear, detailed insights into supplier operations, assess alignment with our Responsible Sourcing Program, and determine whether further actions such as audits, remediation, or capacity building are necessary.

In 2024, we initiated targeted disclosure requests from a supplier of stevia, an ingredient commonly sourced from high-risk regions including Xinjiang, China. Our engagement focused on improving traceability down to the farm level to determine any links to forced labour. This work is ongoing and forms part of a broader supply chain mapping initiative which will continue in 2025.

#### **Supply Chain Mapping**

In 2024, we began a multi-year supply chain mapping process to better understand human rights risks beyond our Tier 1 suppliers. Mapping to farm level is crucial, as this is often where the highest risks of modern slavery or exploitation occur due to informal employment and weak oversight. Understanding these deeper layers helps us prioritise risks and support suppliers in protecting vulnerable workers.

This work will continue through 2025, enhancing our ability to detect risks and collaborate with suppliers for meaningful impact upstream.



### **CASE STUDY Dairy**



In 2024, we completed farm-level mapping for one of our major dairy suppliers as part of our broader supply chain transparency work. This involved site visits, supplier interviews, and reviews of addresses to better understand sourcing practices and potential labour risks within the Victorian dairy sector.

Through this engagement, we confirmed that most of our raw milk during the reporting period was sourced from small, family-run farms in the Gippsland region. While most of the labour appeared to be locally based, some farms rely on seasonal or visa workers to support operations during peak periods. These labour arrangements may involve third-party labour hire providers, which can carry elevated risks of underpayment, excessive hours, or inadequate oversight.

The dairy supply chain is inherently complex, with milk collected through aggregated transport systems and farm-level sources subject to change from season to season. This fluidity makes it challenging to maintain consistent visibility over individual farms and highlights the need for ongoing engagement and monitoring.

As dairy represents our largest ingredient spend, we see this work as critical to our modern slavery risk management approach. In 2025, we plan to continue working closely with our dairy suppliers and relevant industry partners to improve traceability, build understanding of risk factors, and explore opportunities to strengthen labour practices across this essential supply chain.

## **Strategic Engagement**

The final stage of our Responsible Sourcing Program focuses on strategic engagement - a more collaborative and forward-looking approach to improving outcomes for workers and communities in our supply chain. It builds on our foundational due diligence work and aims to move beyond risk identification toward more targeted action and shared responsibility with supply chain partners.

Rather than prescribing a single approach, strategic engagement allows us to explore a range of activities with selected suppliers linked to higher-risk supply chains where deeper visibility, dialogue, and collaboration may support improved outcomes. These may include joint initiatives to enhance worker wellbeing, strengthen supplier practices, or better understand the lived experience of workers and local communities.

In 2024, we finalised our three-year action plan, which identified strategic engagement as a key area of future focus. As part of this, in 2025 we plan to scope the feasibility of conducting worker interviews within the supply chain of a high-volume priority ingredient. The aim is to better understand on-the-ground challenges and identify potential opportunities for deeper engagement. This work will help shape our strategic approach in a way that is informed, practical, and responsive to the realities of each supply chain context.

## **Assessment: Effectiveness of Our Efforts**

Given the complexity and reach of our supply chain, we adopt a structured approach to assess the effectiveness of our actions to mitigate modern slavery risks. We measure the effectiveness of our approach at each stage of our Responsible Sourcing Program. These insights help us refine our approach and ensure that our actions are delivering tangible improvements in working conditions and risk mitigation throughout our supply chain.



#### Table 4: How we Assessed the Effectiveness of our Efforts

Focus Area	What we aim towards	2024 Outcomes
Supplier Pre-screening	100% of Direct suppliers are screened.	In July 2024 our new vendor submission form was updated to include a responsible sourcing approval requirement.  This additional level of due diligence ensures every new supplier is screened for modern slavery risk, and 55 new suppliers were pre-screened in the reporting period.
Supplier Monitoring	100% of high-risk Direct suppliers are SEDEX compliant.	100% of high-risk Direct suppliers were SEDEX compliant at December 31, 2024.
	100% of high-risk Direct suppliers completed a third-party audit within the past 2 years.	76% of high-risk Direct suppliers undertook a SMETA third-party audit within the past 2 years.
	Increased SEDEX compliance of Indirect supplier sites.	19 Tier 2 supplier sites were SEDEX compliant.
Remediation	Remediation of major, critical, or business critical non-conformances detected in third-party SMETA audits.	127 non-conformances were detected, and 104 were closed by the end of the reporting period. We continue to monitor the closing of all major, critical, and business critical non-conformances within the period allocated by the auditor.
Deeper Due Diligence	All palm oil products are purchased from RSPO certified sources.	100% of our palm oil was sourced from RSPO mass balance certified suppliers.
	Any identified Chobani non-conformances to RSPO standard are remediated within time allocated by a third-party auditor.	4 non-conformances were identified and remediated within the assigned timeframe.
	Targeted disclosure requests to improve visibility of high-risk supply chains.	Requested targeted disclosures relating to stevia, palm oil, and cacao.
Supplier Engagement	Develop new collaborative engagements to improve worker wellbeing or community development in our supply chain.	No progress made during the reporting period. This initiative will roll out as a pilot in 2025 with a key supplier of high-risk ingredients.



## **Looking Back**

Since publishing our first Modern Slavery Statement in 2020, we have continued to build and refine our approach to managing modern slavery and human rights risks. In 2024, we significantly strengthened our efforts by expanding our approach with a new Program and investing in a dedicated resource to support its implementation. We continued to track progress against the commitments outlined in our 2023 Modern Slavery Statement, reviewed the effectiveness of our processes, and identified areas for improvement. This included building capability across our teams, refining our due diligence tools, and responding to identified risks with appropriate action. We also elevated our engagement with suppliers, industry partners, and external stakeholders to share insights, seek feedback, and support alignment with recognised good practices. As part of our new Program, we will continue to assess the effectiveness of our actions in reducing modern slavery risks and improving conditions in our operations and supply chain.

### **Looking Ahead**

We understand that meaningful progress on modern slavery requires persistence, accountability, and ongoing engagement. Our focus is on strengthening our internal systems, improving supplier engagement, and adapting our policies and procedures based on what we learn through implementation. Looking ahead, we remain focused on embedding and evolving this work to reduce risk and improve outcomes for the people and communities connected to our business.

Here are a few of the key initiatives we plan to deliver in 2025:



## Key Suppliers' Modern Slavery Response Annual Check-up

Prepare a comparative snapshot of the 'past' and 'present' coverage for each key supplier in the areas of governance, supply chain transparency, and ongoing due diligence initiatives.



## **Deeper Supply Chain Due Diligence**

Improve supply chain visibility through targeted disclosure requests focused on confirming the origin of more priority ingredients and explore new or elevated third-party certifications.



#### **Responsible Sourcing Training**

Launch a new series of Chobani team training to improve awareness of modern slavery risks and opportunities, including training on the new Chobani Supplier Code of Conduct for our procurement team.



## **Supplier Collaboration Initiatives**

Informed by our progress and learnings to date, scope new collaborative opportunities with Direct suppliers of priority ingredients focused on creating positive impact in the supply chain through improved social outcomes.



#### **Policies and Processes**

Review our current suite of policies and processes, including finalising a Remediation and Escalation Framework, developing a Human Rights Policy, and drafting a Responsible Procurement Policy.

## Consultation

During the reporting period, Chobani Pty Ltd did not own or control any other entities, as such no consultation with other entities was required nor took place.

In 2025 we will engage closely with our recently established New Zealand entity to ensure the right systems and processes are in place in that territory.

## **Approval of Statement**

This Statement was approved by Chobani Pty Ltd.'s board of directors (as the principal governing body of that entity) on 30 June 2025.



#### **Scott Hadley**

Managing Director Australia/New Zealand

Chobani Pty Ltd

27 June 2025

## Reporting criteria

Mandatory criteria	Reference in this Statement
Identify the reporting entity	Page 2
2. Describe the reporting entity's structure, operations, and supply chain	Page 6, 10, 20
<ol> <li>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls</li> </ol>	Page 7, 11, 22
<ol> <li>Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes</li> </ol>	Page 12, 26
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Page 17, 32
6. Describe the process of consultation with any entities the reporting entity owns or controls	Page 37

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