



Modern Slavery Statement

Birch & Waite Holdings Pty Ltd

Birch & Waite Foods Pty Ltd

Australian Food Investments Pty Ltd

EP Foods Pty Ltd

31 December 2024





Reporting Entities

This Modern Slavery Statement (“Statement”) is made on behalf of Birch and Waite Holdings Pty Ltd (ACN 624 063 314) and its wholly owned subsidiaries:

- Birch and Waite Foods Pty Ltd (ACN 003 232 844), and
- Australian Food Investments Pty Ltd (ACN 168 585 313), which wholly owns the subsidiary EP Food Company Pty Ltd (ACN 099 418 747),

(collectively referred to as “Birch and Waite”), for the financial year ending 30 June 2024.

This Statement, prepared pursuant to section 14 of the *Modern Slavery Act 2018* (Cth), represents Birch and Waite’s first submission under the Act.

Our Statement

For over 30 years, Birch & Waite has celebrated Australian produce through our authentic, chef quality recipes loved by professional kitchens and home cooks. In 1986, Willi Schultheiss and Peter Flick began Birch & Waite’s story when they saw the opportunity to celebrate the abundance of superior quality fresh produce in Australia. Continuing with Peter and Willi’s legacy, Birch & Waite has grown to include a committed team which brings pride and passion from their diverse backgrounds evolving our vision and food philosophy such that it meets the changing needs of the Australian foodservice industry and Retail Grocery consumers.

The Birch & Waite Sustainability Recipe is our plan to keep our commitment to creating fresh, chef quality products while we look after the planet and its people. Our founders, Willi Schultheiss and Peter Flick understood the connection between land, produce, and taste. They were determined to use only the finest fresh Australian ingredients to create superior quality foods with outstanding flavour. Today, the Birch & Waite Sustainability Recipe takes our founders’ commitment even further, while staying true to our values and our purpose: to transform good meals into great meals.

Our ambition is to look after our shared environment while we improve the lives of our team, customers, the Australian community and the global environment. In alignment with our values and dedication to ethical practices, Birch & Waite is committed to upholding the principles outlined in the *Modern Slavery Act 2018*. We recognise our responsibility to ensure that modern slavery and human trafficking have no place in our operations or supply chains. By fostering transparent relationships with our suppliers and partners, we actively promote fair labour practices and human rights.



Our commitment extends to continuous monitoring and improvement of our policies and procedures to prevent any form of exploitation. Through these efforts, we aim to contribute positively to the lives of our team members, customers, the Australian community, and the global environment.

Through **our values** that underpin everything we do; we strive to our ideals as we proactively seek to improve.



TOGETHER

We act as **one team**.
We **respect** and **value** one another.
We utilise our **diversity** as a strength.
We **celebrate wins** together.



COMMITTED

We **do what we say** we will do.
We **take pride** in our work.
We set and maintain **high standards**.
We win with **accountability** and **determination**.



AUTHENTIC

We accept, give and act on **feedback**.
We foster **trusted relationships**.
We **own** and **learn** from mistakes.
We stay **humble** and **open** to change.



CREATIVE

We take **strategic, balanced risks**.
We create **new possibilities**.
We encourage **enterprising, aspiring** problem solvers.
We **disrupt** our industry to **shape the future**.



Birch & Waite is steadfast in its commitment to eradicating modern slavery practices and proactively addressing risks of such practices within our operations and supply chains. We fully support the *Modern Slavery Act 2018* (Cth) and align with governmental efforts to combat human rights violations globally.

This Statement provides an overview of Birch & Waite’s operations, supply chains, and potential modern slavery risks. It highlights the actions we have taken to address these risks, assesses the effectiveness of those actions, and outlines our approach during this first reporting period. Additionally, it identifies opportunities for remediation and improvement to strengthen our practices moving forward.

Underpinning this Statement is Birch & Waite’s unwavering commitment to continuous improvement. We remain dedicated to acknowledging and addressing the risks within our operations and supply chains and taking meaningful steps to minimise and mitigate those risks effectively.



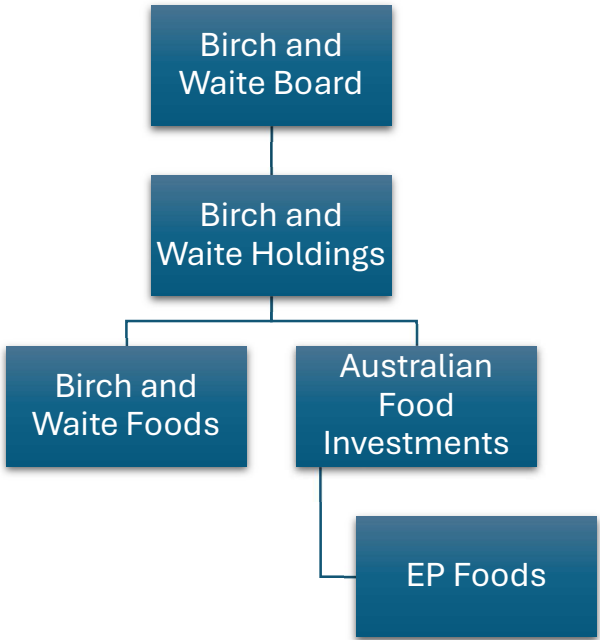
Organisational Structure, Operations and Supply Chain

Organisational Structure

Birch & Waite operates under a centralised management structure from our head office in Marrickville, NSW, with all entities governed by the same board. While Birch & Waite Foods and EP Foods share key corporate functions (including procurement, sales and marketing, finance, information technology, and human resources) and collaborate with many of the same vendors, they are managed as distinct business units.

EP Foods operates with a degree of independence under its own General Manager, while still reporting to the same CEO as Birch & Waite Foods. This arrangement allows EP Foods to function as a separate business unit while benefiting from shared resources and strategic alignment.

Accordingly, this Statement is made on behalf of all Birch & Waite entities, reflecting the shared commitment to ethical practices and addressing modern slavery risks across our collective operations and supply chains.





Operations

Birch and Waite operate across three manufacturing sites in Australia, two in Sydney NSW and one in Yandina QLD, with remote sales staff working remotely across the other Australian states. Birch and Waite employ approximately 218 permanent staff and between 20 and 50 casual workers depending on seasonal production requirements.

At Birch & Waite, we take immense pride in delivering products that reflect exceptional quality, authenticity, and craftsmanship. For over 30 years, we have collaborated with Australia’s leading chefs to create culinary excellence—designed by chefs, for chefs. Our products are freshly chilled to preserve superior flavour and quality, without relying on artificial flavours, colours or preservatives. Crafted locally in small batches, we ensure consistent, chef-quality results that are as close as possible to scratch-made. By using the finest locally sourced Australian ingredients, we celebrate the abundance of seasonal produce, reinforcing our commitment to delivering outstanding products that meet the highest standards for both foodservice and retail markets.



Chef quality

For over 30 years we have partnered with Australia’s leading chefs to develop products of culinary perfection, made by chefs for chefs



Fresh chilled

Our products are made using chef quality, authentic recipes, fresh chilled, without the need for artificial flavours, colours and preservatives



Batch crafted

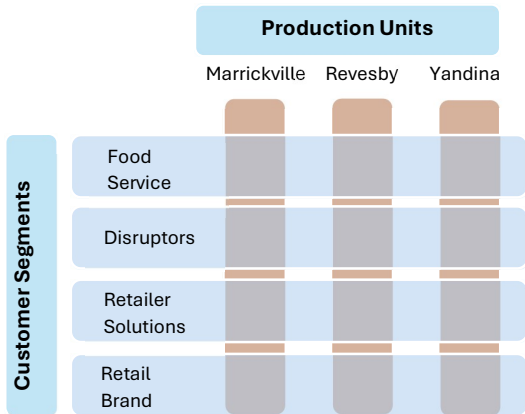
We make our products locally, in batches to consistently deliver a superior chef quality taste, the closest to scratch made



Australian ingredients

Australia is blessed with an abundance of fresh seasonal produce, that’s why our superior quality products start with the finest locally sourced Australian ingredients

Birch and Waite serve a variety of clients across four distinct customer segments delivering batch crafted mayonnaise, dressings, dips, emulsions, sauces, and desserts. Customers include the major supermarket retailers, restaurants, clubs, hotels, food distributors, independent retailers and some export customers.





Suppliers

In preparing our first Modern Slavery Statement, Birch & Waite has prioritised assessing the modern slavery risks associated with our **High-Value Tier 1 suppliers**. We define High-Value Tier 1 suppliers as those with whom we maintain an annual trading relationship exceeding \$1 million. These **suppliers represent 65%** of Birch & Waite’s total procurement spend.

As we continue to mature and enhance our supplier compliance program, we will establish clear definitions for lower-tier suppliers and progressively incorporate them into our modern slavery risk assessment process.

Currently, 100% of Birch & Waite’s High-Value Tier 1 suppliers are based domestically within Australia and operate under Australian laws. These suppliers are categorised as follows:



Ingredients

- Canola Oil
- Eggs
- Sugar
- Cream
- Milk
- Mustard



Packaging

- Bottles & Caps
- Pails
- Sachet Film
- Cartons



Risks

Background

Australia has a comprehensive legislative framework to combat human trafficking, slavery, and slavery-like practices, including servitude, forced labour, and deceptive recruitment. These laws apply to both exploitative labour practices in the public sphere and instances of exploitation within the private sphere.

Australia's commitment to eradicating slavery-like practices is reinforced through protections for victims and strict legal provisions. For instance, the Crimes Act 1914 (Cth) and the Criminal Code Act 1995 (Cth) offer measures such as the Vulnerable Witness Protection Program to safeguard victims of modern slavery. Additionally, the Migration Act 1958 (Cth) criminalizes allowing individuals to work in breach of visa conditions and provides mechanisms for victims without valid visas to lawfully remain in Australia.

The Modern Slavery Act 2018 (Cth) further strengthens this framework by introducing a risk-based approach to identify and address modern slavery practices within supply chains, holding organisations accountable for their role in mitigating such risks.

Notably, Australia's slavery-related laws have extraterritorial reach. This means offenders can be prosecuted regardless of whether the conduct occurred within or outside Australia, and irrespective of the nationality of the victims or perpetrators.

This robust legal structure underscores Australia's commitment to preventing modern slavery and protecting the rights of vulnerable individuals both domestically and globally.

Initial Assessment of Birch and Waite's Supply Chain

In conducting our initial assessment of modern slavery risks within Birch & Waite's supply chain, we focused on **geographical risk** as a primary lens for evaluation. All Birch & Waite's High-Value Tier 1 suppliers operate domestically within Australia. Given Australia's robust legislative framework—including the Modern Slavery Act 2018 (Cth), Fair Work Act 2009 (Cth), and Proceeds of Crime Act 2002 (Cth)—alongside complementary State and Territory laws, we assess the risk of modern slavery within this tier of our supply chain to be **low**.

To further strengthen our approach, Birch & Waite has implemented an **Ethical Sourcing Policy** and an **onboarding Ethical Sourcing Form** that all suppliers are required to complete as part of the trading process. This ensures that our suppliers align with our ethical sourcing standards and commitments. Additionally, we rigorously review **Product Information Forms (PIFs)** to verify countries of origin for raw materials, ensuring that no materials are sourced from internationally sanctioned countries as identified by the Australian Government or the United Nations.



We also acknowledge that modern slavery risks may increase further upstream within the broader supply chain network of our High-Value Tier 1 suppliers. To address this, Birch & Waite has joined the **SEDEX (Supplier Ethical Data Exchange)** program, which enables greater visibility into supply chain practices, facilitates risk identification, and supports responsible sourcing initiatives. More details about our participation in SEDEX are outlined in the following section.

This Statement marks Birch & Waite's first public articulation of the steps we have taken toward developing a comprehensive modern slavery risk assessment. We recognise the importance of extending our focus beyond Tier 1 suppliers to include lower-tier suppliers, and we are committed to refining our risk assessment process to provide greater detail and accountability in future statements.

Our Actions and Approach

Approach and Actions

While no instances of modern slavery practices were identified within Birch & Waite's operations or supply chain during this reporting period, we remain committed to proactively working with and assessing our suppliers to prevent such practices from emerging in the future. Birch and Waite completed the development of an Ethical Sourcing Policy applicable to Birch and Waite, its controlled and related entities, and its suppliers. Birch & Waite will continue to provide education and guidance to our staff, ensuring they are equipped to identify and address modern slavery risks. Additionally, we will maintain rigorous vendor qualification processes to uphold our ethical sourcing standards and safeguard the integrity of our supply chains.

Birch & Waite is committed to enhancing transparency and accountability within our operations and supply chains to effectively address modern slavery risks. As part of this commitment, we have registered with SEDEX (Supplier Ethical Data Exchange), a globally recognised platform for managing ethical and responsible business practices. SEDEX provides tools and resources that enable businesses to identify, assess, and mitigate risks related to human rights, labour standards, and modern slavery within their supply chains.

To further strengthen our efforts, Birch & Waite has scheduled our first **SMETA (SEDEX Members Ethical Trade Audit)** for January 2025. SMETA is one of the world's most widely used audit methodologies and focuses on assessing compliance across key areas, including labour standards, health and safety, environmental practices, and business ethics.



The key benefits of our participation in SEDEX and the SMETA audit process include:

- **Increased Visibility:** SEDEX provides greater insight into the ethical practices of our suppliers and business partners, helping to identify potential modern slavery risks at all levels of the supply chain.
- **Enhanced Accountability:** SMETA audits validate our commitment to ethical practices and provide actionable insights to drive continuous improvement.
- **Risk Mitigation:** By assessing suppliers against global ethical standards, we can proactively address labour and modern slavery risks, ensuring compliance with both legal requirements and our own Ethical Sourcing Policy.
- **Collaboration and Best Practices:** SEDEX facilitates collaboration with other businesses, enabling us to adopt industry best practices and implement effective measures to combat modern slavery.

The SEDEX registration and upcoming SMETA audit represent significant milestones in Birch & Waite's journey towards achieving optimal modern slavery outcomes. These steps reflect our ongoing commitment to ethical business practices, transparency, and the protection of human rights across our operations and supply chains.

By leveraging SEDEX and SMETA, Birch & Waite aims to ensure that our processes remain robust, our risks are minimised, and our standards align with global expectations for ethical and responsible business conduct.

Continuous Improvement and Commitment

At Birch & Waite, we recognise that the fight against modern slavery requires ongoing vigilance and a commitment to continuous improvement. To ensure this program is effectively managed, we have established an internal Steering Committee tasked with overseeing and implementing our efforts to eliminate and reduce the risks of modern slavery across our operations and supply chains.

The Steering Committee's responsibilities include:

- **Oversight and Investigation:** Monitoring, investigating, and addressing any potential modern slavery practices associated with Birch & Waite or its suppliers.
- **Effectiveness Review:** Assessing the impact and effectiveness of actions taken to date in mitigating modern slavery risks.
- **Training and Awareness:** Reviewing and enhancing organisational training programs and tools to ensure staff understand modern slavery risks and their role in upholding Birch & Waite's ethical policies and controls.



Moving forward, the Steering Committee will drive several key initiatives to further strengthen our modern slavery program:

Extending Risk Assessments	Encouraging SEDEX Participation	Continuous Supplier Engagement	Regular Program Evaluation
While the initial focus has been on High-Value Tier 1 suppliers, we will expand our risk assessment processes to include lower-tier suppliers, where modern slavery risks may exist.	Birch & Waite will encourage all suppliers, particularly those in higher-risk categories or regions, to join the SEDEX platform. Increased supplier participation will enhance transparency, improve data sharing, and facilitate collaborative efforts to identify and mitigate risks throughout the supply chain.	We will engage more closely with our suppliers to promote adherence to ethical sourcing practices, ensure compliance with our Ethical Sourcing Policy, and maintain open communication regarding modern slavery risks.	The Steering Committee will conduct periodic reviews of our processes, policies, and tools to identify areas for improvement, ensuring our program evolves to meet emerging risks and global standards.

Through these initiatives, Birch & Waite remains committed to fostering a supply chain that is transparent, accountable, and free from modern slavery practices. Continuous improvement is integral to our approach, as we strive to set higher standards for ethical business conduct and ensure the long-term integrity of our operations and supplier partnerships.



Consultation and Approval

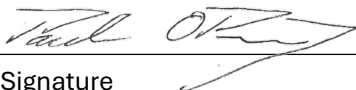
Consultation Process

This Statement was prepared by the ESG Steering Committee, with consultation being undertaken with senior leadership and board members of Birch and Waite.

Approval

This Statement was approved by the CEO and the Board of Directors of Birch and Waite Holdings Pty Ltd, Birch & Waite Foods Pty Ltd, Australian Food Investments Pty Ltd and EP Foods Pty Ltd.

EXECUTED by Birch and Waite Holdings Pty Ltd, Birch & Waite Foods Pty Ltd, Australian Food Investments Pty Ltd and EP Foods Pty Ltd:



Signature

Paul O'Brien
CEO

Director

20 December 2024

Date