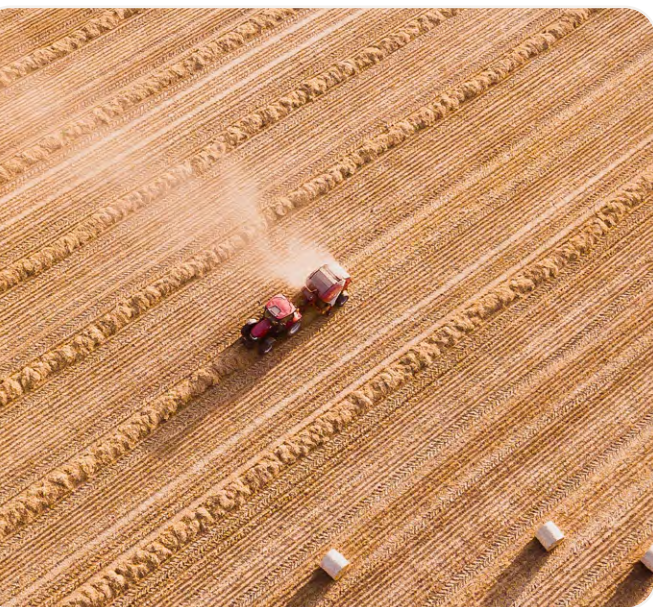


Modern Slavery Report

FINANCIAL YEAR ENDING 28 JULY 2024



[arnotts.com](https://www.arnotts.com)



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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 28 July 2024 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.¹

Modern supply chains are intricate networks, often times spanning countries and industries.

It is this very complexity that obscures labour practices happening down the line and lulls businesses into thinking that the concerns and risks of modern slavery exist beyond their sphere of control.

However, whether you have visibility over it or not, the reality is that millions of people worldwide find themselves trapped in slavery, being exploited by others for commercial or personal gain – and this is something we all, as global citizens, have a duty to address.

At The Arnott's Group, we remain committed to tackling the risks of modern slavery across our value chain – not only because it is required of us, but because it is the right thing to do.

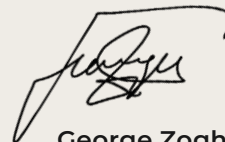
We know our success as a business is interlaced with the wellbeing of our employees, suppliers, partners and the communities in which we source from and operate in.

In the past year we have undertaken a number of important actions aimed at assessing and eliminating modern slavery risks within our operations. These include the:

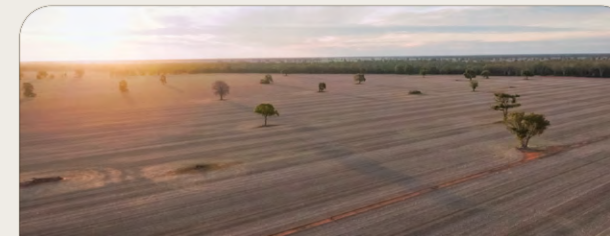
- Continued roll out of our Supplier Management Hub and supplier scorecards, enhancing our ability to monitor modern slavery requirements across our direct and indirect supplier base;
- Reinforcing of our *Modern Slavery Guidelines and Checklist* for prospective suppliers;
- Implementation of a third-party screening policy to assist with identifying adverse media associated with modern slavery risks;
- Commencement of work with our Asia business to integrate the company's modern slavery policies and processes; and

- Continued education of our employees about our modern slavery risks through mandatory modules and policy communications.

While the global nature of supply chains makes rooting out unethical practices in a different part of the world difficult, we all need to rise to the challenge – ensuring standards are upheld across the entire supply chain. By using the power of our brands and our business reputation, we are able to take a proactive stance against modern slavery that reverberates through our value chain and contributes to the creation of a safer, more equitable world.



George Zoghbi
CEO, The Arnott's Group
Director, Snacking Investments
Holdco Pty Ltd



01

Structure, Operations & Supply Chains

The Arnott's Group portfolio of brands continues the 159-year legacy of the Arnott family. We employ over 3,700² people in markets across the Asia Pacific region to provide high quality, great-tasting food to create delicious moments for consumers across the world.

Our business is headquartered in Sydney and we operate bakeries in Australia near Sydney, Brisbane and Adelaide. We also operate bakeries in New Zealand and Indonesia. In addition to the Arnott's brand, our portfolio also includes Campbell's products which are sold into countries including Australia, New Zealand, Malaysia, Hong Kong, Indonesia and Japan, with manufacturing operations for these products in Shepparton, Australia and Petaling Jaya, Malaysia.

The Arnott's Group is also the majority owner of cereals and snacking business Good Food Partners, which has a site in Victoria. 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.



3,700+

people are employed
in markets across Asia Pacific

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:

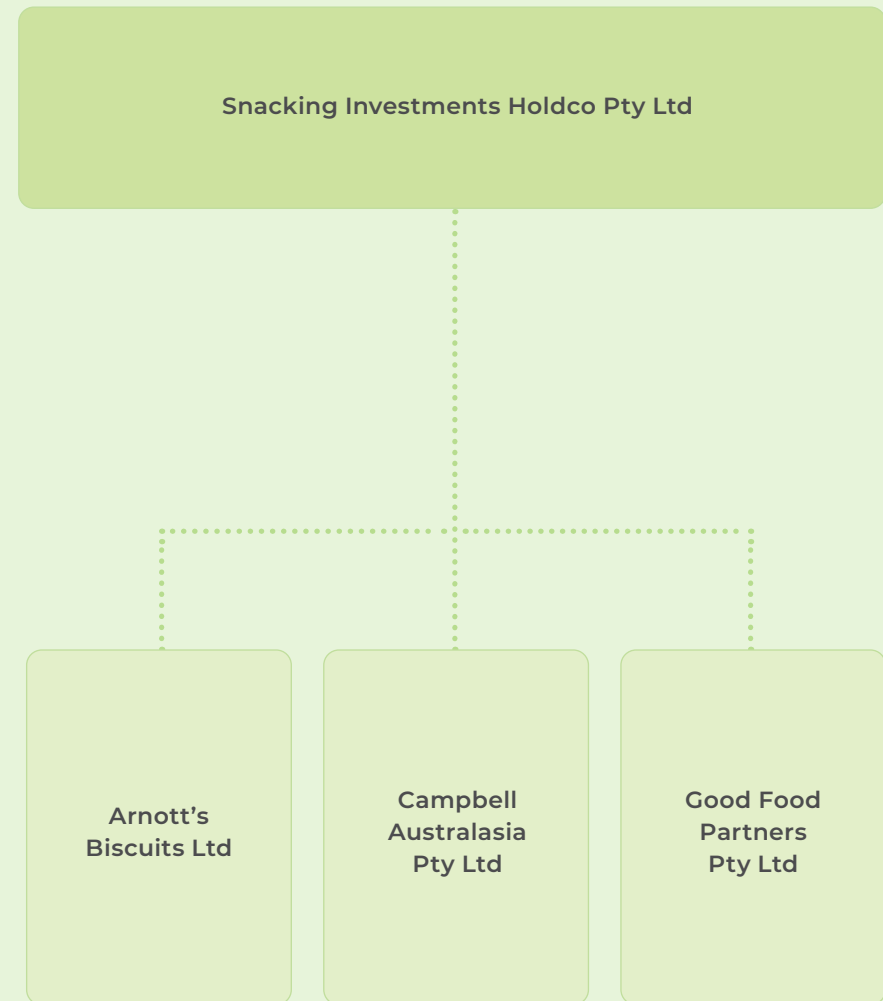
- **Arnott's Biscuits Limited** (ABN 44 008 435 729), which operates the biscuits and snacks portfolio; and
- **Campbell Australasia Pty Ltd** (ABN 28 004 456 937), which operates the juice, soup and stock portfolio.

These two companies essentially operate as a single business using the same policies and processes, and under the management of the same leadership team. Snacking Investments Holdco also owns a 75 percent 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 the 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 portfolio of brands includes household names such as Tim Tam, Shapes, Iced VoVo, SAO, Vita-Weat, Salada and Tiny Teddy. We also own the full range of 180 Degrees' crackers and biscuits brands. In addition, we own brands such as Nyam Nyam, Good Time and Kimball, which we make and sell in Asia.

Our portfolio also includes Campbell's soup, stock and juice brands. We own the Country Ladle brand within this portfolio and use other key brands (such as Campbell's Real Stock, Prego and V8) under licence from Campbell Soup Company.

Good Food Partners is a business unit of The Arnott's Group that has a portfolio of cereals and snack brands that includes Messy Monkeys, Heritage Mill, Arnold's Farm, Freedom cereals, Sam's Pantry, Sunsol and Joy St.



Operations

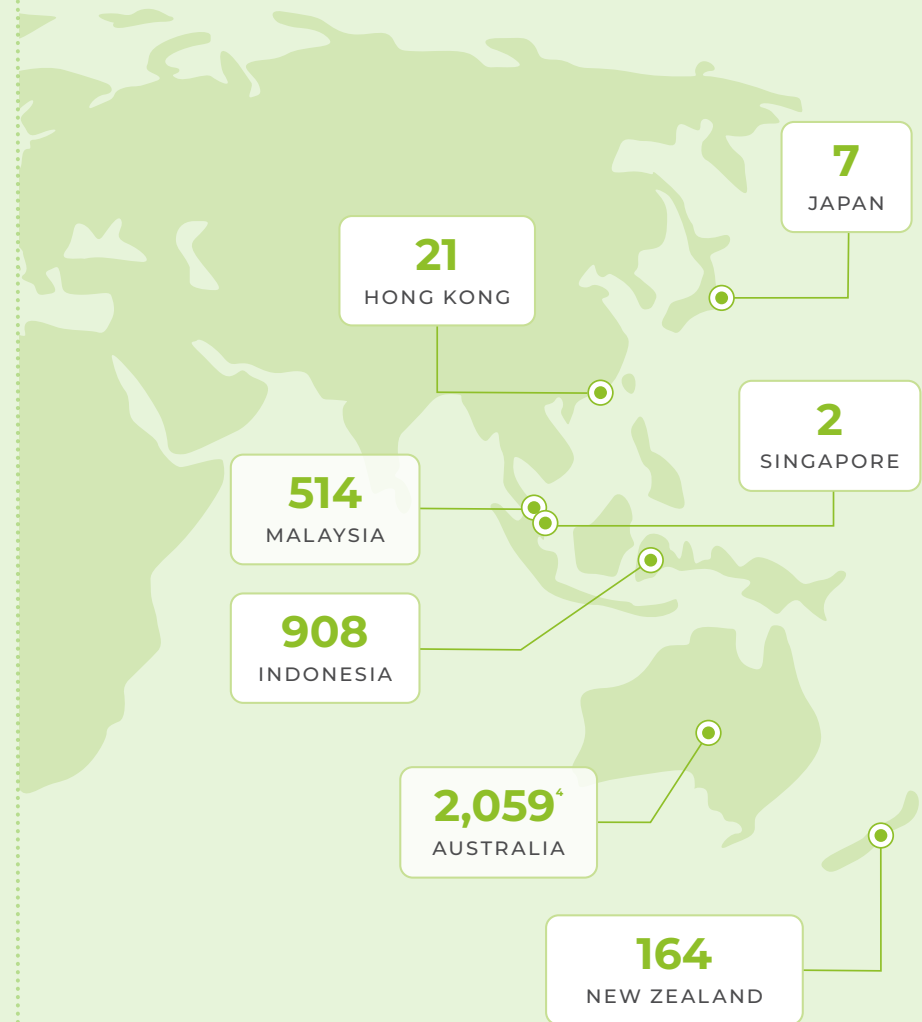
The Arnott's Group undertakes a range of activities in pursuit of our business objectives and standards.

These include:

- Direct and indirect employment in manufacturing, field sales and corporate activity;
- Procurement and purchasing of ingredients, packaging and other materials and services;
- Production of biscuits, crackers, snacks, cereals, meals, soups, stocks and juices;
- Development of new food products;
- Merchandising services at customer retail premises;
- Product distribution, marketing, sales and exports; and
- Operation of The Arnott's Foundation, a charitable arm supporting community initiatives.



GEOGRAPHIC STAFF PROFILE³



Supply Chains

The Arnott's Group ANZ (excluding Good Food Partners)

The Arnott's Group's ANZ supply chain arrangements were largely the same as in the previous reporting period. Most of our long-term arrangements with key ingredient (being wheat flour, sugar, oils, dairy and cocoa products) suppliers remained in place, and we continued to utilise short-term arrangements as necessary. We also continued our commitment to local manufacturing, with more than 99 percent of products sold in Australia made in Australia.

During the reporting period, The Arnott's Group's ANZ operations sourced inputs for our products directly from approximately 185 suppliers, the majority of which are based in Australia.⁵ 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 1,488 other suppliers, including maintenance and operations, marketing, logistics,

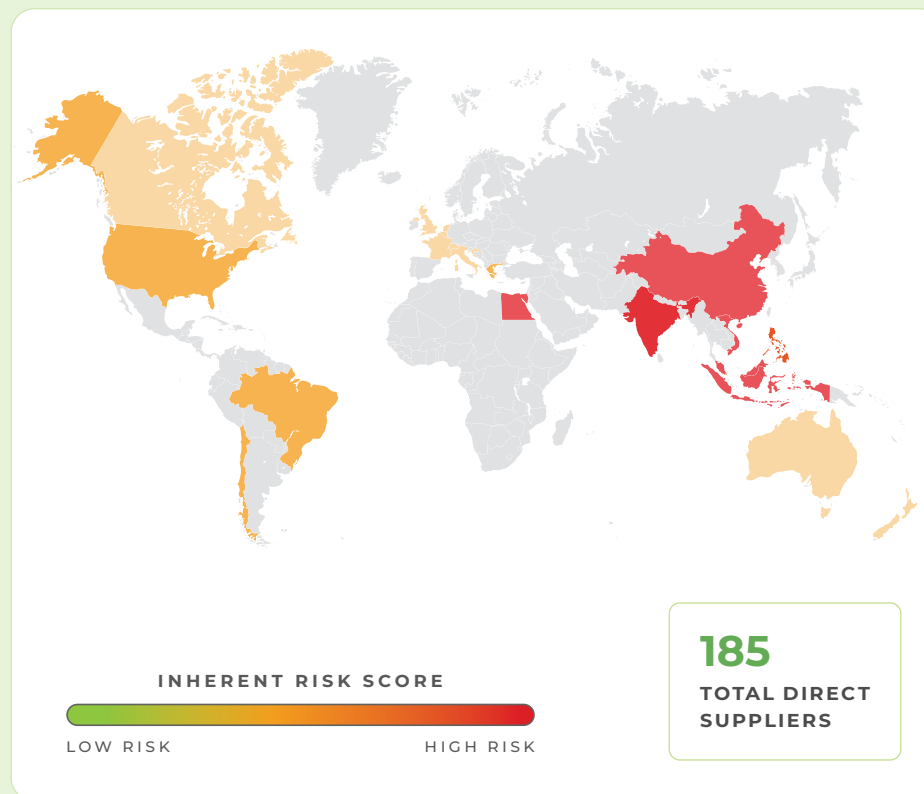
capital, human resources, corporate, IT and telecommunications and utilities services.

In addition to engaging Australian-based suppliers, we also procured goods and services from suppliers in Belgium, Brazil, Canada, Chile, China, Denmark, Egypt, France, Germany, Greece, India, Indonesia, Italy, Malaysia, New Zealand, Philippines, Singapore, Switzerland, the Netherlands, UK, USA and Vietnam.

The Arnott's Group does not engage suppliers in countries that are subject to international sanctions. As a number of these sanctioned countries are also associated with high risks of modern slavery, our sanctions compliance policy indirectly contributes to mitigating modern slavery risks in our supply chains.

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

RISK SCORE FOR SUPPLIERS OF DIRECT INPUTS



Good Food Partners

Good Food Partners sourced direct inputs for products from approximately 175 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 indirectly sources from Europe, USA, South America and Asia through arrangements with local suppliers.

02

Salient Issues

In our first reporting period under the *Modern Slavery Act 2018 (Cth)*, we undertook a comprehensive review of modern slavery risks in our operations and supply arrangements.

As our supply chain has remained relatively consistent since that time, our focus during this reporting period has been on reinforcing our responsible sourcing expectations among our existing suppliers, minimising modern slavery risks when engaging new suppliers and ensuring that there is continued oversight and tracking to ensure that our suppliers, both new and existing, are adhering to modern slavery laws and expectations.

We have described below the salient issues relevant to our business from a modern slavery perspective.

Key risks identified



Palm oil



Cocoa



Sugar



Labour & contracting services



CASE STUDY: Palm oil

Palm oil is the world's second largest oil crop and widely used in various food products. Indonesia and Malaysia are the two largest exporters of palm oil, together producing over 80 percent of the world's supply of palm oil. We are aware that the palm oil supply chain has a high degree of modern slavery risks due to the use of unskilled migrant labour in regions that are high risk for human rights violations.

The Arnott's Group ANZ business (excluding Good Food Partners)

The Arnott's Group's Australian business sources 100 percent segregated Roundtable on Sustainable Palm Oil (RSPO) certified palm oil from peninsular Malaysia, from land which has been used to produce palm oil or other agriculture crops. The RSPO sets out environmental and social criteria which participants must comply with that minimise the negative impact of palm oil cultivation on the environment and communities in producing regions including modern slavery.

The RSPO and its members recognise, support and commit to following the United Nations' *Universal Declaration of Human Rights* and the International Labour Organization's (ILO) *Declaration on Fundamental Principles and Rights at Work*.

In addition, Cargill, our palm oil supplier:

- Follows "free, prior and informed consent" principles in the palm oil supply chain. This means there is informed, non-coercive, negotiations between it and local communities prior to oil palm farms being established and developed;
- Has controls in place to ensure its supply chain is free from forced labour; and
- Operates a smallholder program to ensure it deals with a range of growers of different size. Smallholder farmers account for around 40 percent of its palm oil supply. [Learn more.](#)

We also participate in Cargill's PalmWise tool which provides an extra layer of transparency over our Malaysian palm oil supply chain. The tool provides us with a greater level of detail as to exactly where supply is coming from and allows us to monitor for any certification concerns with those suppliers.

Our New Zealand business sources RSPO mass-balanced palm oil from Cargill. The mass-balance model is a certification system from the RSPO that monitors the trade of RSPO-certified palm oil products throughout the entire supply chain.

Good Food Partners

Good Food Partners purchases and uses RSPO mass-balanced palm oil.

The Arnott's Group Asia business

Our Malaysia business sources a very small amount of non-RSPO certified palm oil (as the quantity we source in Malaysia is below the minimum quantity required by our supplier to supply certified palm oil). The palm oil supplier is a Sedex member.

Our Indonesia site purchases and uses RSPO mass-balanced palm oil in its products exported to Australia and New Zealand, and non-certified palm oil in products sold locally in Asia that use palm oil.

Our Asia business sources both certified and non-certified palm oil from suppliers who have acknowledged and complied with our *Responsible Supplier Sourcing Code (RSSC)* and thereby have committed to human and labour rights.



Cocoa

We use cocoa in a number of our products, including our chocolate biscuits. Cocoa grows primarily in the tropical climates of Western Africa, Asia and Latin America, countries that have been associated with modern slavery practices.

Our ANZ business (excluding Good Food Partners) currently source cocoa liquor products entirely from Asia, with all our cocoa suppliers being Sedex members. We have retained our Rainforest Alliance certification on some of the cocoa we source. The Rainforest Alliance certification supports cocoa-growing communities, including working with almost one million cocoa farmers to build thriving livelihoods through certification and training.

The Rainforest Alliance takes an assess-and-address approach, which requires certified farms and processing facilities to set up internal committees to prevent and monitor child labour, and to quickly remediate any cases that might be found. Currently 15 percent of the cocoa we source is Rainforest Alliance certified. We are working on ensuring that 100 percent of the cocoa we source for our ANZ business are certified (whether through Rainforest Alliance or another equivalent certification) by 2035.

As in previous years, Good Food Partners continues to procure cocoa products from two suppliers, both of which are Sedex members and supply Rainforest Alliance certified cocoa products.



CASE STUDY: Sugar

We use sugar in many of our products. We are aware that a recognised risk in relation to the supply of sugar is that of child labour and unfair labour practices. In particular, we are aware of recent modern slavery concerns surrounding the supply of sugar from India, which is the second largest producer of sugar in the world.

The Arnott's Group ANZ business (excluding Good Food Partners)

All sugar used in our ANZ operations are sourced from Australian suppliers and grown in Australia, and they are all members of Sedex (with audits indicating that they are low risk from a modern slavery perspective).

Our major sugar supplier for our ANZ business is Wilmar International Limited (Wilmar). Wilmar has implemented a number of policies to manage and address the risk

of modern slavery within its business operations, including the *Wilmar Human Rights Policy*, *Wilmar Code of Ethical Conduct*, and *Wilmar NDPE Sugar Policy*. The *Wilmar Human Rights Policy* sets out Wilmar's expectations of employees and suppliers to conduct business in a responsible and ethical manner, and strives to respect and protect human rights, personal security that is free from harassment or abuse of any kind. The *Wilmar Code of Ethical Conduct* ensures that employees are aware of their obligations to maintain an acceptable and satisfactory level of conduct and personal behaviour, which includes a commitment to human rights as required by national legislation or at least as set forth in the United Nations' *Universal Declaration of Human Rights*, the ILO's *Declaration on Fundamental Principles and Rights at Work*, and the United Nations' *Guiding Principles on Business and Human Rights*.

Finally, the *NDPE Sugar Policy* sets out the key principles and approaches to strengthen Wilmar's supply chain relationships with its sugar suppliers, mitigate risks (including modern slavery risks) and promote responsible and sustainable practices. In particular, the *NDPE Sugar Policy* requires that Wilmar:

- Respect and support internationally recognised human rights;
- Respect and recognise the rights of all workers;
- Respect and protect the rights of children and their welfare;
- Respect land tenure rights;
- Respect the rights of indigenous and local communities; and
- Identify measures to provide remediation where Wilmar has caused or contributed to negative human rights impacts.

Wilmar's latest Modern Slavery report noted that there is a low risk of modern slavery being present in its operations and supply chain in Australia.

The Arnott's Group Asia business

Our main sugar supplier in Malaysia obtains their raw sugar from Thailand and Brazil, with the bulk of sugar sourced being either Bonsucro certified or part of the VIVE Sustainable Supply Program. Bonsucro is the leading global sustainability platform and standard for sugarcane, and sugar that is Bonsucro certified means higher wages (certified farms pay 19 percent above the national minimum wage) and safer working conditions. The VIVE program is a continuous improvement sustainability program for food ingredient supply chains, one of its platforms being to eliminate child labour.

Our major sugar supplier used in our Indonesian manufacturing facility is Sentra Usahatama Jaya (SUJ). SUJ sources their sugar mostly from Thailand and also some from Brazil.

SUJ is committed in preventing modern slavery practices through the following measures:

- No forced labour;
- No withholding of employee identification documents, passports, work permits or money as a condition of employment;
- No employment of workers under 18 years of age;
- Living wages are provided in accordance with applicable laws and regulations;
- Regular working hours do not exceed 40 hours per week and working overtime is purely voluntary;
- Freedom of association is respected;
- Employees are provided with a safe, comfortable and healthy working environment; and
- Ensuring the controlling the supply of raw sugar from countries that are free from modern slavery issues.

In addition, all our sugar suppliers in Asia are members of Sedex (or obtains their sugar from a Sedex member) and acknowledge and commit to our *RSSC*.

Good Food Partners

Good Food Partners sources its sugar through Manildra Group (Manildra). The sugar sourced is grown in Australia and Bonsucro certified.

Manildra is Sedex certified and has incorporated the following to address and mitigate any modern slavery risks:

- Manildra has established its *Modern Slavery Policy* (which affirms Manildra's commitment to eliminating modern slavery) and *Human Rights Policy* (which affirms Manildra's commitment to respecting all human rights);
- Manildra has subjected its policies, procedures and practices to external ethical auditing in adherence with the Sedex assessment, including: (a) auditing selected sites to ensure ethical trading and corporate responsibility; (b) developing

training resources for employees to adhere to responsible and ethical business practices; and (c) enhancing its employee *Code of Conduct and Ethics* to include labour standards, health and safety, management systems, environmental sustainability and ethical business practices; and

- Manildra has implemented actions to strengthen procurement oversight, including: (a) requesting Manildra's suppliers provide their own modern slavery statements; and (b) requiring all new suppliers to complete Manildra's responsible business practices questionnaire prior to approval and meet Manildra's supplier Terms and Conditions (which requires suppliers to specify their commitment to protecting human rights).



CASE STUDY:

Labour contracting services

The Arnott's Group engages labour contractors from a number of third party entities, one of which is Compass Group Australia (Compass).

We employ contractors through Compass for a number of purposes including cleaning and catering services. We are conscious that Compass' operations – delivering labour and support services – has been recognised by the ILO as potentially posing higher risks of modern slavery, compared with some other industries.

In order to mitigate modern slavery risks, Compass has:

- Developed and embedded strategies and processes to further clarify their ethical sourcing requirements to contracted labour hire agencies, including contract enhancements, right to audit and expectations around the Employer Pays Principle (where no worker should have to pay any recruitment fees to get a job);

- Completed a review of Compass' labour hire agencies' risk profile; and
- Enhanced and increased Compass' internal recruitment capacity and capability to reduce the ongoing requirement for external labour hire agencies across their business.

More broadly, Compass has the following processes and frameworks in place to ensure that their operations comply with ethical procurement policies, processes and supply chain investments:

- Compass has a number of policies that provide minimum standards and guidance in relation to human rights and modern slavery, such as: *Code of Business Conduct* (which provides principles-based guidance for the business); *Supplier Code of Conduct* (which sets out high ethical standards, principles and behaviours expected from Compass' supply chain partners); and *Human Rights Policy* (which states Compass' commitment to the four core convention of the ILO);

- Compass invests in training for its procurement team. Compass provides ethical procurement training focussed on raising awareness and recognising signs and indicators of modern slavery, as well as the escalation processes and procedures in case a concern has been identified. Compass also facilitates external training delivered in collaboration with Sedex, aimed at providing tools to enable its procurement team to effectively assess risks and gain increased visibility over the extended supply chain;
- Compass uses Sedex, suppliers' ethical certifications and third party audit findings to assess the risks of modern slavery in their

operation and supply chains and actively work with their suppliers to ensure that adverse Sedex audit findings are addressed;

- Compass requires their strategic suppliers to commit to a formal SMETA audit as part of their contractual terms with Compass, with additional audits during the contract life cycle when trading conditions and risk profile change; and
- Compass piloted the *Third Party Integrity Due Diligence* policy, which provides an additional source of supply chain data and which is mandatory for all new supplier engagements.



03

Assessment & Mitigation of Modern Slavery Risks



In this reporting period, The Arnott's Group continued to progress our efforts to identify, minimise and mitigate modern slavery risks.

During the reporting period, we pursued the following actions aimed at eliminating modern slavery risks in our operations and supply chains.

Our Actions

Institutionalising our Supplier Management Hub

At the end of our last reporting period, we launched our online Supplier Management Hub for our ANZ operations, which streamlines and automates our existing processes for our suppliers. The Supplier Management Hub allows us to have a more structured and thorough approach in terms of how we onboard and monitor our suppliers, including adherence to modern slavery requirements. This is critical given that we have over 100 ingredient suppliers and in time will manage over 1,700 direct and indirect suppliers.



1,700+

ingredient suppliers
will be managed through our
supplier management hub

Through the Supplier Management Hub, we can more easily track suppliers' Sedex rating (including any changes to their rating) and their compliance with modern slavery requirements. The Supplier Management Hub allows us to capture details around all our suppliers' risk ratings, audits and instances of non-compliance. In particular, the Supplier Management Hub uses data from the Sedex platform to enable us to have better and more efficient communication with our suppliers.

In this reporting period, we have continued to roll out and institutionalise our Supplier Management Hub across more of our suppliers, including the enhancement of supplier scorecards directly accessible to all suppliers and driving action through real-time visibility, including Sedex risk ratings.

Reinforcing our *Modern Slavery Guidelines and Checklist*

In our ANZ business, we have reinforced our modern slavery policies and processes as set out below.

Our *Modern Slavery Guidelines* sets out the process for assessing modern slavery risk in relation to prospective suppliers, our minimum conditions

of engagement, and a process for reporting and dealing with modern slavery concerns that arise. In particular:

- A preliminary assessment of modern slavery practices is undertaken before engaging new suppliers. This risk assessment is determined using the Sedex platform and guides the level of any further checks (including independent ethical audits for high-risk suppliers) to be undertaken before engaging the supplier; and
- All suppliers must agree to certain minimum commitments as a condition of engagement. These include: (a) our *Human Rights Policy* (or adopt similar policies within its business); (b) standards and requirements in our *Vendor Requirements Manual*, *RSSC* and sustainability policies; and (c) maintain supplier membership with Sedex and a relationship with us on the Sedex platform.

Before onboarding new suppliers, they must also comply with our *Modern Slavery Checklist*. The *Modern Slavery Checklist* includes a requirement for suppliers in industries typically associated with

an elevated risk of underpayment of workers to complete a questionnaire in relation to their payment rates and practices, providing us with key data points to assess underpayment risk.

We continued to implement and strengthen our supplier registration system to include prompts for actions and information to ensure compliance with key steps in our *Modern Slavery Checklist*. These include:

- Automating the process and confirming the supplier's Sedex membership and rating through our new Supplier Management Hub; and
- Ensuring suppliers are provided with the key documents that we require them to comply with, including our *RSSC*.

We have begun implementing a new Third Party Screening policy in this reporting period to ensure that an appropriate level of due diligence is undertaken on all third parties we engage in business dealings with. In particular, the screening identifies:

- Whether the third party or its related companies, shareholders, directors or key executives are

on any sanctions or restricted party lists; and

- Any adverse media associated with the third party, including adverse media relating to modern slavery risks.

Under the Third Party Screening policy, we do not engage any third parties if it is on any sanctions or restricted party lists or if the screening identifies a high risk of modern slavery risks associated with that third party.

Implementation of our new Third Party Screening policy is currently a work in progress.

Finally, we are in the process of incorporating similar modern slavery policies and processes to our Asia business to make it consistent with our ANZ processes, in particular continuing to implement Sedex participation and *RSSC* compliance for suppliers to our Asia business (with this work having commenced in August 2024).

Educating our people

We continued to educate our employees in managing our modern slavery risk during this reporting period through the following:

- We reinforced our *Modern Slavery Guidelines* in our procurement training module that we require of all employees.
- We continued our annual communications program that includes the re-communication of the *Modern Slavery Guidelines* and *Modern Slavery Checklist* in English, Indonesian, Malaysian and Japanese.
- We continued to re-communicate to key staff on a quarterly basis of our policy on not doing business with persons and entities based in or affiliated with countries that are the subject of international sanctions.
- We continued to deliver our online modern slavery training course, rolling this out to all new salaried employees within three months of joining our business. As part of this training, our staff are made aware of our *Modern Slavery Guidelines* and *Modern Slavery Checklist* as part of the supplier onboarding process.

- This reflects our commitment to ensuring that our employees are well informed of The Arnott's Group's stance on modern slavery, and relevant policies and procedures, from the start of their journey with our business.

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

- We continued to establish Sedex relationships with our suppliers and to actively request that our suppliers complete SAQs. Please refer to section 4 of this report for further information on our suppliers' Sedex membership status.
- The increased number of Sedex relationships with our suppliers and SAQs conducted have facilitated a more accurate assessment of modern slavery risks in relation to a greater proportion of our suppliers. As a Sedex relationship enables visibility of a supplier's SAQs and ethical audit reports, we could more readily identify any modern slavery concerns in relation to these suppliers and take appropriate action. Established Sedex relationships have also provided greater visibility of any modern slavery risks at an individual site level, allowing us to make better informed decisions about the ongoing engagement of suppliers on a site-by-site basis.
- We did not identify any high-risk suppliers in this reporting period.



Leveraging our industry relationships and insights to help identify modern slavery risks in relation to our suppliers

In addition to our internal controls, we closely monitor the industries in which our suppliers operate. We do this through strong relationships with our key suppliers and by using external monitoring tools such as Stroom, a comprehensive, industry leading international media monitoring service. As a result, we are well placed to keep abreast of reported modern slavery issues which emerge that could have potential and/or real impacts on our business.

Reinforcing avenues for reporting modern slavery concerns

- As previously reported, we have continued to enable suppliers and other third parties to report any modern slavery concerns confidentially and anonymously. Our *RSSC* contains a QR code for suppliers to easily and quickly access our whistleblowing platform.

- We continued our internal “speak up” communications campaign, including reminders at our sites and from our CEO, to promote the platform to our people as a confidential way to report concerns.

Ethical and other audits

- We are subject to third party SMETA audits at our sites. Where any gaps or non-compliances are identified from a modern slavery perspective, we prioritise and have put in place measures to address these gaps.
- In this reporting period, a SMETA audit was conducted for our Indonesia and Shepparton sites. For our Indonesia site, all instances of non-compliance have been corrected and closed.
- Good Food Partners also completed a SMETA audit for its new Rowville site in this reporting period, with all instances of non-compliance having now been addressed and closed.

- In this reporting period, Good Food Partners also commenced an internal audit in respect of all commodity and raw material suppliers. This audit is currently a work in progress and will provide Good Food Partners with greater visibility over any modern slavery risks in relation to commodity and raw material suppliers once finalised.

Fair work arrangements for our people

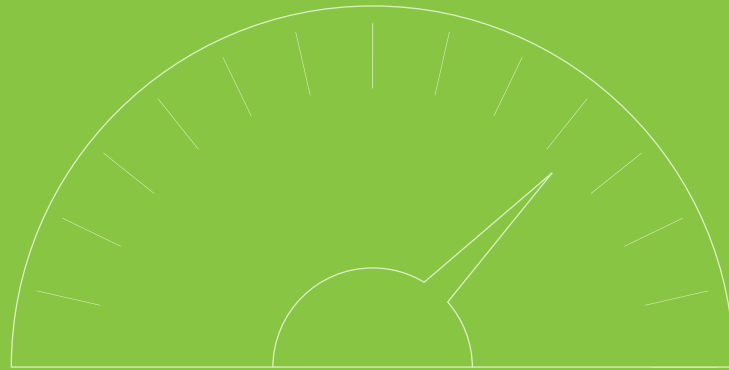
- We continued the processes we have in place to ensure people who work at our sites are legally entitled to do so. This includes confirmation of citizenship or the right to work in the relevant jurisdiction, and that minimum age requirements are met.

- We respect employees’ right to freedom of association, and we have enterprise or collective agreements with our factory employees at the majority of our sites.
- We don’t use “gig economy” models of employment in our business. Only a small proportion of our workforce are casual employees.⁶



04

Measuring Our Effectiveness



The Arnott's Group remains committed to identifying, mitigating and eliminating all forms of modern slavery in our supply chains. As part of this, we continued to assess the effectiveness of our actions on reducing modern slavery practices over this reporting period.

The Arnott's Group, excluding Good Food Partners

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

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

In this reporting period:

- Over 99 percent and 60 percent of direct and indirect material suppliers, respectively, to our ANZ business (by spend) had either confirmed agreement to our *RSSC* or undertaken to comply with their own comparable responsible sourcing code.
- 97 percent and 96 percent of raw material and packaging material suppliers (by absolute numbers) to our Malaysia business have confirmed agreement to our *RSSC* (or undertaken to comply with their own comparable responsible sourcing code), respectively. For our Indonesian business,

95 percent and 94 percent of our raw material and packaging material suppliers (by absolute numbers) have confirmed agreement to our RSSC (or undertaken to comply with their own comparable responsible sourcing code), respectively.

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:

- 143 of the 185 suppliers of direct inputs to our ANZ business were Sedex members and have accepted relationships with us on Sedex (representing around 98 percent by spend).
- 134 of the 1,488 suppliers of indirect inputs to our ANZ business were Sedex members and have accepted relationships with us on Sedex (representing around 48 percent by spend). For our indirect suppliers, we focused on suppliers in higher risk areas like transportation, shipping and the provision of contracted labour such as security, cleaning and maintenance.

The number of our suppliers who have completed SAQs

The number of direct and indirect input suppliers to our ANZ business who completed a SAQ account for approximately 82 percent and 32 percent by spend, respectively.

The findings of SAQs on our sites

The completed SAQs for our manufacturing sites are published on Sedex and are available for viewing by Sedex members with whom we have a relationship. In the current reporting period, we have completed updated SAQs for our bakeries in Sydney, Brisbane, Adelaide and Indonesia, as well as for our simple meals manufacturing site in Shepparton.

Good Food Partners

The Good Food Partners business completed a SAQ during the reporting period for its new Rowville site.



05

Consultation & Approval

05

The Arnott's Group engages in a number of consultative measures to assess and mitigate modern slavery risks in its supply chain and overall operations.

Our customers and non-government organisations

Our major customers are committed to ensuring their supply chains are free from modern slavery. We work with these customers to answer their questions about our business and we submit to independent ethical audits of our facilities by our customers.

We also work with non-government organisations such as the Rainforest Alliance and the RSPO. These organisations have people working in countries with high risks of modern slavery and provide us with valuable insights about how to responsibly source ingredients in these countries.

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 from our headquarters in Australia, our operations in Asia, and also from the Good Food Partners business. Having a working group with representatives from all parts of our business ensures we have a comprehensive, whole of business view of the modern slavery risks for The Arnott's Group. It has also helped us develop a consistent approach to our risk mitigation efforts across the group – including the implementation of our policy documents, minimum supplier expectations, supplier contract terms and training program.

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 and none of them source products.

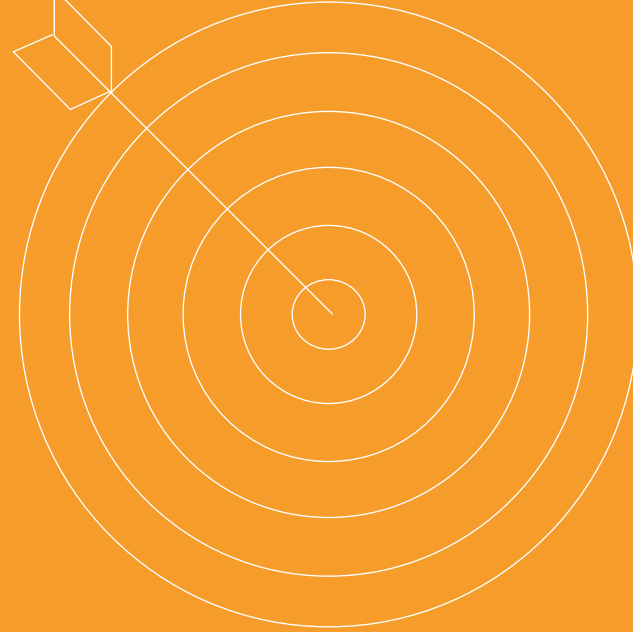
Reporting to the Board

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.



06

Our Ongoing Commitment



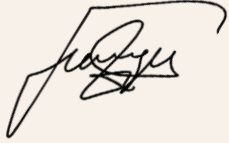
The Arnott's Group is proud to commit to continually improving our operations and supply chain processes and practices to eliminate modern slavery risks.

We anticipate our future actions will include:

- Working on ensuring consistency to our approach in identifying and mitigating modern slavery risks across our entire business and supply chain, including our operations in Asia (and in particular increasing the number of suppliers to our Asia business that are on the Sedex platform, have completed SAQs and/or comply with our *RSSC* or an equivalent code).
- Continuing to monitor and track our suppliers' compliance with modern slavery requirements.
- Continuing to educate our people on modern slavery risk management as part of our regular onboarding and compliance programs.
- Undertaking SMETA audits of our manufacturing sites across Australia and New Zealand if our SAQs deem any of our sites to be high risk (this is consistent with what we require of our suppliers).
- Continuing to work with any suppliers that are deemed to be high risk to understand the nature of the risk and ways to address or mitigate that risk to ensure compliance with modern slavery laws and requirements.

Approval

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



George Zoghbi

Chief Executive Officer, The Arnott's Group
Director, Snacking Investments Holdco Pty Ltd

ENDNOTES

1 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.

2 This includes Good Food Partners and includes permanent, fixed term and casual employees.

3 Approximate employee numbers (excluding casual and non-direct employees) as at 28 July 2024 based on country of incorporation of employing entity. This includes Good Food Partners.

4 Of this number, 1,701 were employed by Arnott's Biscuits Limited, 134 were employed by Campbell Australasia Pty Ltd and 224 were employed by Good Food Partners.

5 As at the end of the reporting period, we had approximately 277 suppliers of direct inputs to production. This included 185 whom we engaged directly, with the remainder engaged through a distributor.

6 In Australia, we have 113 casual employees within The Arnott's Group, including Good Food Partners.

For more information about The Arnott's Group,
please visit: www.arnotts.com

