



Modern Slavery Act Statement

Year Ended 31 December 2020

Introduction

This statement sets out Dr. Oetker Queen Australia Pty Ltd including its subsidiaries (“Company”) actions to understanding all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the FMCG industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Structure

This statement covers all activities of the Company, which is part of the Oetker Group, a large European family-owned company.

The Company is a frozen and ambient food manufacturer employing around 90 people across its three sites in Brisbane, Melbourne and Auckland.

Supply Chains

The Company procures raw materials, semi-finished products, packaging and services from hundreds of international suppliers. However, these only include the direct suppliers that provide, for example, flavours, plastics, cardboards, flour, salami, chocolate and spices. The supply chains are in many cases much longer and may involve several countries. This means that a still-greater number of (indirect) suppliers contribute to the Company’s ability to manufacture its range of products worldwide and deliver the proven quality.

Risk with Company Supply Chain and Operations

The Companies principal activities is the manufacture and distribution of foods products. To do this the Company relies on a large number of local and international suppliers, each of whom have their own supply chains. Some of these suppliers are sophisticated in their systems and processes, and some are less so. The Company’s endeavors in managing transparency in the Company’s supply chain are faced with difficulties due to its complexity, supplier confidentiality and geographic spread.

The majority of the companies finished goods are manufactured in its own or related party premises in first world countries with comparable labour standards therefore operationally the risk is low.

Responsibility and Due Diligence

Overall responsibility for the organisations anti-slavery initiatives lies with the Managing Directors. The Managing Directors and HR are responsible for the statement creation and for ensuring that training of internal staff is carried out.



Relevant Policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in its operations.

- **Employee code of conduct.** The Oetker “Code of Business Conduct” describes the basic requirements, which the organisation expects its employees to adhere to. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour not only internally but also when operating abroad and managing its supply chain.
- **Supplier code of conduct.** Based on the employee code of conduct the “Dr. Oetker Code of Conduct for Suppliers” has been derived. It applies to all suppliers of the Company. In addition to strict compliance with the law, it requires that compliance with the core ILO labour standards is ensured and that the environment is protected.
- **Recruitment/Agency Workers.** The organisation uses only specified, reputable employment agencies to recruit staff and verifies the practices of any new agency it is using before accepting workers from that agency. All permanent, part time and agency staff are covered by minimum fair working standards and award wages in Australia.
- **POD Code of Conduct:** Plantations of Distinction (POD) is a sustainable supply chain initiative of the Company in a key vanilla growing region. The program commits to the POD Code of Conduct that together with affiliate companies commits to social standard including avoiding all forms of harassment, child or forced labour, and promoting the rights of freedom of association, minimum wages, legal working hours and a safe and health working environment.
- **Approved Supplier documentation:** Approved Supplier registration is in the process of being updated to include a commitment from suppliers to prohibit the use of child and or forced labour in their supply chain.

In addition to training staff, the organisation will raise awareness of Modern Slavery issues via a communication campaign;

- Posters
- Email
- Periodic briefings at meetings

Induction Programme

Information on Modern Slavery has been added to the Company Induction programme, which all new starters receive on the first date of joining the company.

Maintaining Effectiveness and Continual Monitoring of Risk Mitigation

The Company is committed to periodically reviewing risk identification, code of conduct, communication and awareness procedures at a Leadership team level. The Company, as part of a global group with activities in other countries with similar legislation will as necessary compare strategies to ensure compliance and best practice. The Company will use external advisers or auditors as deemed necessary.



Approval

This statement covers financial year 1st January 2020 to 31st December 2020. It has been approved by the Board of Directors on 6 July 2021 and signed by joint Managing Directors as responsible members of the reporting entity.

A handwritten signature in blue ink, appearing to read "Fred Himstedt".

Fred Himstedt
Managing Director

A handwritten signature in blue ink, appearing to read "Claudio Christen".

Claudio Christen
Managing Director