

# MODERN SLAVERY STATEMENT 2024



**FLAVOUR MAKERS IS  
COMMITTED TO EXERCISING  
ONGOING DUE DILIGENCE TO  
IDENTIFY AND ADDRESS THE  
RISK OF MODERN SLAVERY  
PRACTICES ACROSS OUR  
BUSINESS AND SUPPLY CHAIN.**

Prepared by  
**FLAVOURMAKERS.COM.AU**

Create Amazing. Always.

## CONTENTS

1. Introduction & Approval
2. Modern Slavery Statement
3. Structure & Operations
4. Supply Chain
5. Identifying Risks & Action Plans
6. Effectiveness of Our Plans
7. Overview

Flavour Makers has a confidential whistleblower policy that enables employees, suppliers, and external stakeholders to report any concerns that may affect adherence to our values including human rights or modern slavery concerns. Reports can be submitted via our independent Whistleblower Protection Officer (WPO) with guarantees of confidentiality and anonymity. The independent WPO has been nominated as Forvis Mazars Australia - Melbourne (Greg Halse).

### Post

Attention Whistleblower Protection Officer Lvl 11  
– 390 St Kilda Road Melbourne 3004

### Phone

Leave a confidential message on  
+61 3 9252 0800.

Email [whistleblower@flavourmakers.com.au](mailto:whistleblower@flavourmakers.com.au)





# 1. INTRODUCTION & APPROVAL

The purpose of this statement is to outline our approach to ensure processes are in place to minimise the risk of modern slavery in our business operations and supply chain. As this is an annual report, we will report on the progress of our action plan. We will also give consideration to any material changes to our operations that may impact the level of modern slavery risk.

Flavour Makers Group is a family-owned, food development and manufacturing business that is committed to conducting business in a sustainable, ethical and socially responsible manner. For Flavour Makers, the notion of family extends beyond our own business operations, to include our supply chain partners and our customers.

Our vision is to be Australia's leading food development and manufacturing business, to amaze our customers, support our families and communities and protect our land for future generations. A future where human rights and the environment are respected and protected.

This is the fourth Modern Slavery Statement prepared by Flavour Makers. This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) and sets out the steps we have taken during the year ending 30th June 2024 to assess and address the risks of modern slavery in our business and associated supply chains.



Nick White  
Co-CEO  
Commercial, Finance & Operations



Jodie Hooker  
Co-CEO  
People, Product & Sustainability

We are fully committed to the highest ethical standards across our business and we will continue to train our employees and raise awareness of this important issue across our businesses. This training, irrespective of the job role or function helps our team to recognise and understand the potential modern slavery issues and take appropriate action.

This statement was approved by the Board of Flavour Makers Group.



## 2. STATEMENT

|  |                    |
|--|--------------------|
| Flavour Makers Pty Ltd                               | ABN 65 005 953 168 |
| Flavour Makers Australia Pty Ltd                     | ABN 61 145 820 220 |
| Flavour Makers Equipment Pty Ltd                     | ABN 65 145 820 739 |
| Flavour Makers HR Pty Ltd                            | ABN 89 145 821 209 |
| Navati Pty Ltd                                       | ABN 82 056 563 681 |
| Flavour Makers IP Holdings UT                        | ABN 27 113 180 927 |
| Passage Foods Unit Trust                             | ABN 67 518 795 244 |
| Celebrate Health Unit Trust                          | ABN 78 595 400 153 |
| AOFC Organic Pty Ltd                                 | ABN 57 622 831 270 |
| Powered by Plants Pty Ltd.                           | ABN 63 605 242 573 |
| *Grifm Culinary Pty Ltd                              | ABN 50 603 646 831 |
| *Grifm JV is 50% owned and managed by Flavour Makers |                    |

This Modern Slavery Statement, published in accordance with the Modern Slavery Act 2018 (Cth), sets out the steps taken by Flavour Makers Group to identify and address its modern slavery risk over the period 1 July 2023 - 30 June 2024 (FY24).

### Consultation

Flavour Makers Group operates as an integrated group of companies with policies, systems and approaches that apply broadly across the group. To prepare this joint statement, Flavour Makers Group engaged with each of the reporting entities covered by this statement and together we consulted the entities we own or control. Flavour Makers operates an integrated supply chain management system through a centralised department that supports all entities within the group. As such, consultation with owned and controlled entities is inherent to our operations. Regular coordination and communication between the supply chain team and entity leadership ensure alignment on modern slavery risk management. This includes shared policies, processes, and risk mitigation strategies that are reviewed collaboratively. We gathered information about the supply chains and operations for each of the reporting entities and entities that we own or control and reviewed the processes that they have in place to monitor and address modern slavery risk.

We recognise that key risk indicators are commonly associated with the food and beverage industry, including:

- Prevalence of base-skilled workers, with a high population of migrant backgrounds;
- Common utilisation of third-party labour arrangements;
- High-risk product and service categories (eg raw material supply); and
- Operations within high-risk geographies





### 3. STRUCTURE & OPERATIONS

Flavour Makers Group currently employs approximately 300 staff via individual employment agreements or via enterprise agreement (Flavour Makers Collective Enterprise Agreement). Ongoing Joint Consultative Meetings are held to discuss matters.

1. FM Collective Agreement
2. Process Improvement
3. Performance Management Systems
4. Communication and Education
5. Conditions of Employment
6. Employee Well-being
7. Training & Development
8. Improving working hours for new and/or vacant positions
9. Career Paths



Flavour Makers was established in 1992 and is a food development and manufacturing business. The Flavour Makers Group provides a comprehensive end-to-end food development and manufacturing solution specifically designed to meet individual customer or brand requirements. We pride ourselves on innovation, agility and building partnerships to deliver food that tastes amazing.

Our capabilities include spice blends, seasonings, nutritional blends, plant based proteins, meal replacement shakes, batters and coatings, functional marinades, baby food, soups, sauces, condiments, shelf stable meals; right through to the manufacture for our brands such as Passage Foods Indian Simmer Sauces and Australian Organic Food Co Soups, Juice and Purees made from 100% Australian organic ingredients. Flavour Makers currently operates out of three main manufacturing plants and a warehouse, all based in the south east of Melbourne.

### 3. STRUCTURE & OPERATIONS

As a family-owned group, we have a strong commitment to employee welfare and comply with all relevant employment legislation. We believe in the fair and equitable treatment of all employees and we work hard every day to ensure that we provide a workplace that everyone is proud of and that the employment conditions and remuneration of each employee is in line with all employment legislation. We invest in the health and wellbeing of our employees and have developed a comprehensive suite of policies outlining our human rights expectations for our team while offering clear guidance on how grievances within the workplace can be raised. Our People team plays a pivotal role in implementing these policy commitments, offering specialised guidance to team members on various human resources concerns. Among our policies, the following are particularly focused on preventing modern slavery within our team:

- Code of Conduct
- Gender Equality
- Discrimination Bullying Harassment
- Incidents and Complaints Policy
- Sex Based Harassment and Discrimination Policy
- Recruit and Select
- Remuneration & Benefits
- Starting employment
- Ending Employment
- Equal Opportunity, Diversity and Inclusion
- Work Related Psychological Health and Safety
- Talent and Succession
- Right to Disconnect
- Flexible Work
- Training and Development
- Promotion (career pathway)
- Performance Review
- Whistleblower

We have proudly launched a Reward & Recognition Platform called Zest, which also serves as a communication platform and hosts our Employee Assistance Program Benestar. We aim to reward, recognise and support our employees, and their families. The importance of mental health and wellbeing of our people is paramount and we are proud of the positive role we can play.

#### FLAVOUR MAKERS FOLLOWS THE RESPECT@WORK FRAMEWORK

Leadership - Develop a governance framework to reflect the responsibility of leaders and the board for addressing sexual harassment  
Risk Assessment & Transparency - cyclical  
Culture - Ongoing development of a safe, inclusive and respectful workplace culture  
Knowledge - Ongoing and cyclical training  
Support - Building a support system that supports a victim after a report of sexual harassment  
Reporting - Developing a good practice reporting framework for responding to reports of sexual harassment in the workplace  
Measuring - Cyclical data collection, analysis, communication

We believe that the risk of modern slavery within our direct team is low due to the strong policies, ongoing monitoring, and team member training that we have implemented as key controls to mitigate this risk in our operations. We are committed to upholding ethical practices and human rights, providing a safe and inclusive workplace.

While we have taken comprehensive measures within our direct team, we also acknowledge the importance of extending these controls throughout our supply chain and indirect operations. We conduct supplier assessments and due diligence on our partners to identify and address potential risks of modern slavery.

Collaboration with stakeholders, industry peers, and relevant organisations is a priority for us as it provides valuable insights and best practices to further fortify our efforts against modern slavery. We are continuously updating and evolving our policies and controls to adapt to emerging risks and changing circumstances, ensuring a robust framework against modern slavery across all aspects of our operations.



## 4. SUPPLY CHAIN

Flavour Makers has over 239 active supply partners, with the majority (208) being direct raw material suppliers. Whilst Flavour Makers endeavours to source locally wherever possible, these are from 68 sourcing countries. Flavour Makers supply chain includes over 30 indirect suppliers supporting our operations including activities such as pest control, labour hire services, cleaning services, logistics services, maintenance and equipment services.

During the period of this report, there have been no material changes to our organisational structure, operations or supply chain that would impact the level of modern slavery risk.

Flavour Makers works closely with our suppliers to develop relationships that support mutually beneficial outcomes and strengthen our combined approach to human rights. These relationships are fundamental to identifying and mitigating modern slavery risks. Flavour Makers requires all Tier 1 suppliers to extend compliance with our Ethical Trading Policy to their own suppliers. Tier 1 suppliers are responsible for monitoring and managing risks within their supply chains and reporting identified issues to Flavour Makers. Our supply chain includes Tier 1 suppliers, 90% of whom are SEDEX members, ensuring adherence to ethical trading standards. Beyond Tier 1, our supply chain includes Tier 2 and Tier 3 suppliers providing raw materials, primarily sourced from Southeast Asia. High-risk sourcing regions account for 1.21% of our supply chain and are associated with products such as spices and cocoa. These categories are prioritised for further engagement and monitoring.



## 4. SUPPLY CHAIN

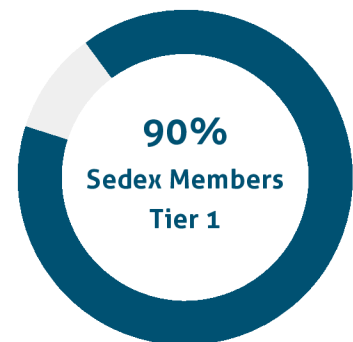
Flavour Makers Supplier Approvals process is managed as a part of our Quality Management System that provides a method of evaluating and rating (approving) companies who supply or who wish to supply products and services to Flavour Makers to ensure they meet the necessary quality, food safety and ethical standards required by Flavour Makers. Supply chain monitoring is undertaken by our procurement professionals and our Quality departments. Flavour Makers engages stakeholders at multiple levels to address modern slavery risks. Suppliers are required to adhere to our Ethical Trading Policy and provide compliance declarations.

Through SEDEX, Flavour Makers collaborates with industry peers to access data and identify risks within the supply chain. Additionally, publicly available tools, such as the Global Slavery Index, are used to guide risk prioritisation. Internally, annual training ensures management and procurement staff are equipped to recognise and mitigate modern slavery risks. Flavour Makers prioritises risk management in high-risk categories, including spices sourced from South Asia and cocoa from West Africa. Suppliers in these categories are required to adhere to our Ethical Trading Policy, prohibiting forced labor and recruitment fees. SEDEX risk profiles and publicly available tools, such as the Global Slavery Index, are used to identify potential vulnerabilities.

Based the highest level of risk within the Modern Slavery Index, the map shows the countries that are considered to be high risk. Flavour Makers currently source 1.21% of ingredients from high risk countries, down from 2.38% last reporting year.



Flavour Makers employs the Supplier Ethical Data Exchange (SEDEX) program to assess supplier adherence to these standards, to assess social and environmental aspects. To reaffirm our supplier's commitment to modern slavery, existing and new suppliers are required to review and sign our Ethical Trading Policy. This policy was developed in accordance with the internationally recognised Ethical Trading (ETI) Base Code codes of practice.



Flavour Makers, in this reporting period, has conducted assessment of risk on 100% of our direct ingredient supply utilising the following:

- Sedex Data
- Flavour Makers Group Ethical Policy (in accordance with the internationally recognised Ethical Trading (ETI) Base Code codes of practice) or supplier equivalent
- Country of Manufacture
- Global Slavery Index



## 5. RISK AND ACTION PLAN

### Our Operations

We consider our Australian direct workforce to be low risk to modern slavery, with policies, training and practices further mitigate this risk. We regard our greatest risk of modern slavery is through our supply chain.

Flavour Makers have established an Human Rights & Modern Slavery Committee who have identified the following initiatives in order to identify and mitigate risk for the FY2024 reporting period. Implementation of our policies is monitored by our team of Human Resource professionals.

Our actions to address and mitigate Modern Slavery Risks include:

- External professional development course for Modern Slavery Awareness (SAI Gloval)
- Sedex Membership as a Buyer/Supplier (AB) ongoing engagement
- Human Resources Platform (UKG)
- Reward, Recognition & Communication Platform (Zest)
- Complete annual policy review
- Ethical Sourcing Policy review
- Vendor assurance program
- Raw material and supplier risk assessment
- Horizon Scan database subscription
- Occupational Health & Safety Management System
- Action Plan Deployment
- Training & Awareness

### Achievements

- Removal of Russia a supplying country
- 1st SMETA at a Flavour Makers site (248)
- Implemented new labour hire compliance check
- 3 Tier one supplier audits carried out on Chinese suppliers

#### Annual Ethical Training

- Modern Slavery
- Mental Health Obligations for Managers
- Diversity, Equity and Inclusion
- Anti-Bullying and Anti-Harassment
- Anti-Competitive Conduct
- Anti Bribery and Corruption
- Consumer Protection and Unfair Business Practices
- Discrimination
- EEO (Equal Employment Opportunity) Managers
- Occupational Health and Safety
- Occupational Health and Safety (Managers)
- Racial Discrimination
- Respect @ Work
- Respect @ Work Preventing Sexual Harassment for Leaders

We recognise that key risk indicators are commonly associated with the food and beverage industry, including:

- Prevalence of base-skilled workers, with a high population of migrant backgrounds;
- Common utilisation of third-party labour arrangements;
- High-risk product and service categories (eg raw material supply); and
- Operations within high-risk geographies



## 6. PLAN EFFECTIVENESS

We monitor the effectiveness of our actions to remove the risk of modern slavery from our operations and supply chain by:

- Investigating any reports received from employees, the public, or law enforcement agencies that indicate the existence of modern slavery practices;
- Flavour Makers Labour, Health & Safety, Environment and Business Ethics standards are assessed as low risk
- Engagement with stakeholders on modern slavery issues or concerns, including procurement team members, quality and regulatory;
- Annual risk assessment of our supplier base.

Flavour Makers assesses the effectiveness of its actions through the following metrics that are reviewed annually to ensure continuous improvement:

- 90% of suppliers signed compliance declarations acknowledging our Ethical Trading Policy, with 90% maintaining SEDEX membership;
- 100% of employees involved in management and procurement completed modern slavery awareness training in FY24
- Sourcing from high-risk regions decreased from 2.38% in FY23 to 1.21% in FY24.

Flavour Makers remains committed to continuing awareness and capability for team members and business partners on modern slavery risks, issues and mitigation activities, in line with our sustainability objectives including building responsible partnerships. Always.

To ensure our actions are effectively reducing or preventing modern slavery practices we have set up a senior management group to review our response to modern slavery. The management group will integrate the findings of Flavour Makers, and the results of our Supplier Approval Program, ongoing risk assessment and planned activities. The senior management annual review ensures programs and risk assessments are relevant and up to date. The results of our consultation and review will form the basis of our Modern Slavery Statements.





## 6. PLAN EFFECTIVENESS

### Looking Ahead

Action Plan for Financial Year 2025:

- SMETA audit at Gov Road
- Implement SEDEX SAQ (self assessment questionnaire) as part of our service provider approval process. (e.g., Indirect suppliers such as cleaning services, logistics providers)
- Flavour Makers will extend risk assessment to include service providers
- Further risk analysis and supply chain mapping including additional investigations of high risk suppliers and partners
- Mitigate future risk by continuing to build supplier capability, assisting to develop our suppliers and partners
- Conducting supplier audits for high risk suppliers
- Ongoing Industrial Relations and multi-stakeholder engagement
- Flavour Makers will continue to conduct assessment of risk to prioritise supplier engagement and modern slavery risk mitigation activities, prioritising high risk geographies identified
- Flavour Makers have been involved in a SEDEX member forum in this reporting period with further engagement activities planned for next reporting period
- Review Flavour Makers Group Ethical Policy (in accordance with the internationally recognised Ethical Trading (ETI) Base Code codes of practice) to gain 100% completion
- Review Remediation Processes



## 7. OVERVIEW

**Modern Slavery Statement Overview of the mandatory criteria detailed in the Modern Slavery Act 2018 as follows:**

**Identification of the reporting entity**

This is addressed on page 4

**Description of the process of consultation with any entities the reporting entity owns or controls**

This is addressed on page 4

**Description of our structure, operations, and supply chain**

This is addressed on pages 5-8

**Description of the risks of modern slavery practices in our operations and supply chains and any entities we own or control**

This is addressed on page 9

**Description of the actions we have taken to assess and address these risks (including due diligence and remediation processes)**

This is addressed on page 9

**How we assess the effectiveness of our actions**

This is addressed on page 10-11

