

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2022

This statement sets out the actions taken by New Food Coatings Pty Ltd to address modern slavery and human trafficking risks across our business and supply chain for the financial year ending 31 July 2022.

www.nwfap.com.au



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Introduction

At New Food Coatings Pty Ltd, trading as Newly Weds Foods (Australia), Newly Weds Foods (New Zealand), Newly Weds Foods (Thailand) and Newly Weds Foods (Philippines) we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain.

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

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Our Business and Supply Chains

New Food Coatings Pty Ltd, trading as Newly Weds Foods, is a manufacturer of food ingredients, employing close to 700 people across Australia, New Zealand, Thailand and the Philippines. Supplying Breadcrumb Coatings, Batters, Seasonings, Sauces, Marinades and functional ingredients to Poultry, Seafood, Meat, Smallgoods and Pasta processors.

Our head office and main manufacturing plant is in Sydney, with a second Australian plant in Perth and subsidiary plants in New Zealand, Thailand and Philippines supplying local and export markets.

Where ever possible we source our raw materials and packaging items from locally grown or locally manufactured sources, however we do also source ingredients from China, India, Thailand, Vietnam, USA, Canada and Europe, both directly and through local distributors.

We establish a relationship of trust and integrity with all our suppliers, built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report the allegation to the authorities for investigation.

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Risk assessment

In the past 3 years, we have conducted risk assessments of our supply chain taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment determined and continues to determine our response and the risk controls that we implement.

Modern slavery takes many forms.

Human trafficking: The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.

Forced labour: Any work or services people are forced to do against their will under threat of punishment.

Debt bondage/bonded labour: The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.

Descent-based slavery: Most traditional form, where people are treated as property and their "slave" status was passed down the maternal line.

Slavery of children: When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.

Forced and early marriage: When someone is married against their will and cannot leave. Most child marriages can be considered slavery.

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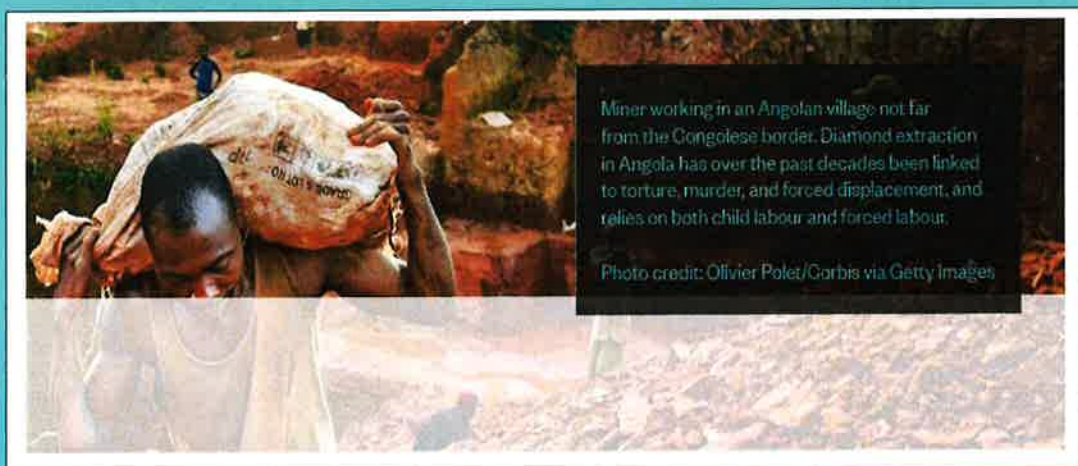
Engaging with International Counterparts

Newly Weds Foods (New Zealand), Newly Weds Foods (Thailand) and Newly Weds Foods (Philippines) are sophisticated businesses supplying global customers that require ethical sourcing and business conduct and as such much of the key prevention method against Modern Slavery were already part of their business practices. Key managers from Newly Weds Foods (Australia) have held on line meetings with our international counterparts conducting awareness programs to develop strategies on how to integrate Modern Slavery awareness and prevention practices into the already detailed practices of these international businesses.

On top of the formal programs, these matters are discussed at:

- Group Board Meetings
- Bi Annual Regional Purchasing meetings
- Global meetings

<https://www.globallslaveryindex.org/2018/findings/regional-analysis/overview/>



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Policies

New Food Coatings Pty Ltd operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- Workplace Accountability Policy
- Purchasing Code - we have updated our Purchasing Code and Supplier Questionnaire to make explicit reference to slavery and human trafficking.
- Corporate Social Responsibility Policy

Similar Policies exist in New Zealand, Thailand and Philippines.

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Supplier due diligence

New Food Coatings Pty Ltd, conducts due diligence on all new 1st tier suppliers during on-boarding and on existing 1st tier suppliers at regular intervals.

This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We have requested raw material suppliers attest that:

- They provide a safe and healthy work environment and are not engaging in forced or bonded labour, human trafficking, slavery or child labour in contravention to International Labour laws
- They are conducting business ethically, lawfully and with integrity, offering reasonable hours, wages and conditions to all employees
- They are aware of and uphold all relevant laws and regulations in the countries in which they operate.

Over the last 12 months, we have continued to expand on this group and in the next 12 months are looking to expand to start to include due diligence on 2nd tier suppliers and service providers.

Newly Weds Foods (Philippines) have undertaken and completed works towards ensuring compliance to the McDonalds Supplier Accountability program.

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Awareness

New Food Coatings Pty Ltd continues to raise awareness of modern slavery issues by putting up posters across our facilities, on our internal Notification Screens and sending emails that are focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training

In addition to the awareness programme, New Food Coatings Pty Ltd, in 2020, 2021 and 2022 has rolled out a training session to all employees in Australia, New Zealand, Thailand and Philippines, which covered:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices

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- How employees should respond if they suspect slavery or human trafficking
 - An attestation from employees that they will abide by New Food Coatings Pty Ltd, anti-slavery policy –

We are currently working on more interactive online assessment based training that ensures understanding to be completed and rolled out 2023 to all staff first in the first instance.

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Measuring how we're performing

To manage the risk and assess the effectiveness of our approach and processes related to modern slavery risks an internal Modern Slavery Working Group has been created. The Working Group will determine the most appropriate method, scope and resources and will review and monitor the progress of all actions.

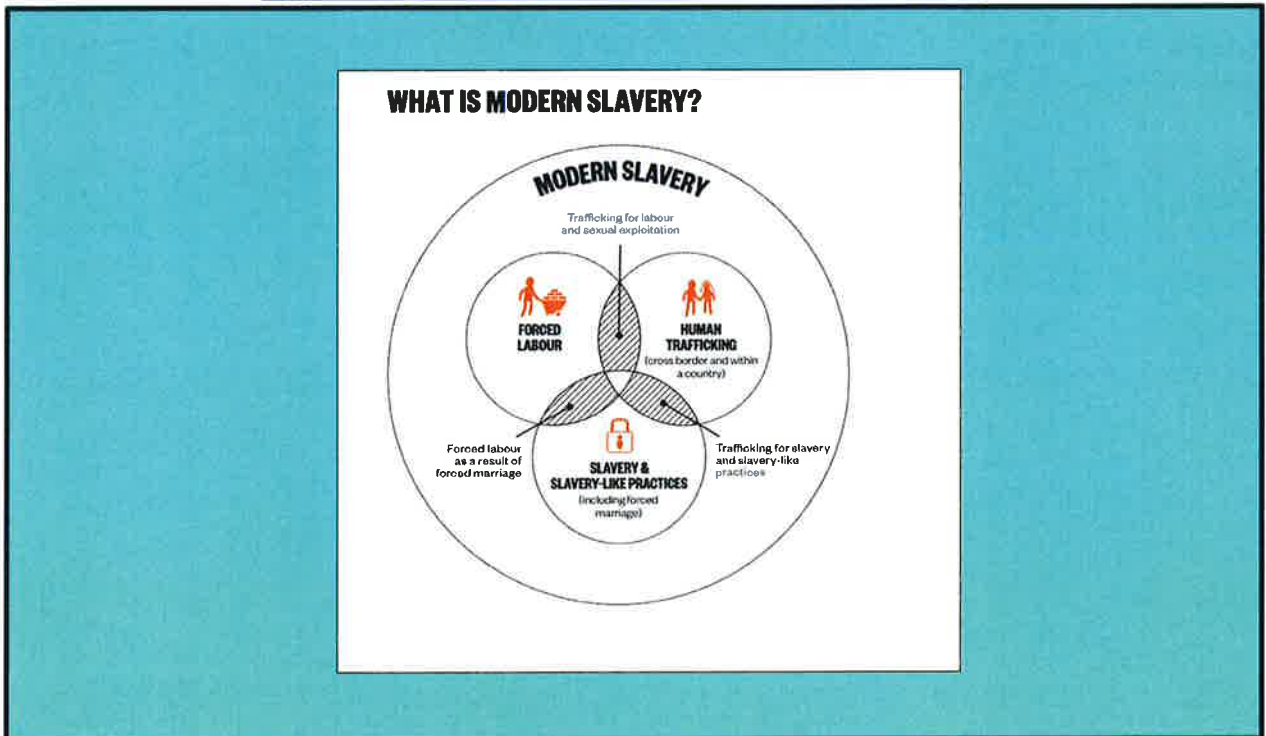
New Food Coatings Pty Ltd has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain.

These include:

- Number of employees that have completed mandatory training?
- Number of suppliers that have filled out our ethics questionnaire?
- Number of suppliers that have rolled out an awareness and training programme that is equivalent to ours.
- Number of reports that have been made by our employees that indicate their awareness of and sensitivity to ethical issues?


- Third Party Social Accountability Audit
- Internal Social Accountability Audit

<https://cdn.walkfree.org/content/uploads/2020/10/06163210/Walk-Free-Foundation-Pacific-Report-04-2020.pdf>



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This statement covers 1 August 2021 to 31 July 2022 and has been approved by the board of New Food Coatings Pty Ltd.

Signature: .....

Director

Name: Brian E Johnson.....

Date: 12/15/2022.....

Signature: .....

Director

Name: Timothy W. Wheeler.....

Date: 12/15/2022.....

Resources used:

- Global Slavery index <https://www.globalslaveryindex.org/>
- Modern Slavery Act <https://www.legislation.gov.au/Details/C2018A00153>
- General information <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx>
- Australian Border Force resources <https://modernslaveryregister.gov.au/resources/>