

18 December 2024

RITEBITE GROUP PTY LTD MODERN SLAVERY STATEMENT 2024 – 2025

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth). It sets out the commitment and actions RiteBite Group Pty Ltd (ABN 61 623 450 117) has taken to address the risks of modern slavery and human trafficking in our operations and supply chains during the financial year ending 2024. This statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018 (Cth).

ABOUT RITEBITE GROUP PTY LTD

At RiteBite Group, we're proud to help consumers across the world to snack better. From the indulgent comfort of our delicious heritage treats to the healthy goodness of our modern snacking products, our focus is on providing the perfect snack for every occasion.

While RiteBite Group was formed in 2019, our history can be traced all the way back to 1927 – when legendary Australian confectionery company, Darrell Lea, was founded.

From humble beginnings – when Harry Lea began selling chocolates and candies from a cart on the streets beneath the Sydney Harbour Bridge – Darrell Lea has gone on to become one of the most enduring and well-loved brands in Australia.

Today, Darrell Lea is one of the few remaining iconic Australian food brands that's still operated and manufactured right here in Australia – a legacy that RiteBite Group is proud to be a part of.

To meet the evolving demands and preferences of today's consumers, the RiteBite Group offers 'the whole snack box', with a portfolio of Australian-owned brands that covers everything from classic liquorice and mints through to protein bars and fruit-based snacks. Now one of Australia's leading modern snacking companies, RiteBite Group is committed to delivering high-quality confectionery and healthy snack products that satisfy and delight Australians of every age.

Currently, the RiteBite Group is home to ten brands with operations in Australia, New Zealand and the USA, where we supply great snacks to millions of people.

At RiteBite Group, our commitment to ethical conduct and integrity is deeply rooted in our organisational values. One of our core values is 'Make It Better Together', which drives us to continuously improve our practices and collaborate with stakeholders to contribute positively to society. Within our organisation, programs relating to Human Rights are captured strategically in our People and Business plans where accountability, responsibilities, and key actions for human rights and modern slavery risk management are distributed throughout the business via our ESG strategy, code of conduct, key policies and relevant local and internal legislation and best practices outlined within this document.



This modern slavery statement outlines our efforts to identify, prevent and address modern slavery and human trafficking within the industry reflecting our dedication to making a better and fairer world through collective action.

ORGANISATIONAL STRUCTURE

RiteBite Group Pty Ltd is a privately owned organisation who also trades as Darrell Lea Confectionery Co Pty Ltd. The organisation itself consists of a board and executive team residing over manufacturing, production, distribution and supply chain operations. We employ over 600 staff across Australia, New Zealand, and the USA.

SUPPLY CHAIN AND OPERATIONS

RiteBite Group manufactures and distributes its products from three facilities, two located in Australia and one in New Zealand. These facilities enable us to manufacture and distribute our wonderful products to suppliers who then deliver them to numerous countries worldwide. Currently, we have over 100 major Suppliers and Distribution partners who support us in providing over 450 million gross sales, (29,000 tonnes) to millions of locations for consumers worldwide.

IDENTIFYING MODERN SLAVERY RISKS

RiteBite Group Pty Ltd recognises that, as a participant in the food and beverage industry, our sourcing, production, packaging, and transportation activities carry significant risks of modern slavery. When considering these it is important to acknowledge and affirm our commitment to upholding Australia's robust legislative framework that criminalizes trafficking of persons, slavery, and slavery-like practices, including servitude, forced labour, and deceptive recruiting. Australia's commitment is reflected in laws such as the Modern Slavery Act 2018 (Cth), which targets modern slavery in supply chains, and provisions under the Crimes Act 1914 (Cth) and Criminal Code Act 1995 (Cth) that protect victims. Additionally, the Migration Act 1958 (Cth) ensures protection for victims working in breach of visa conditions. Australia's laws have extraterritorial jurisdiction, allowing action against offenders regardless of their or the victims' citizenship, or where the conduct occurred.

Therefore, with the above mind, the potential risks are identified in the following key areas:

Engagement of labour: Unethical employment practices applied to base skilled workers, migrant workers, and seasonal and casual workers, including practices that contravene passport/visa conditions, restricting individuals' rights or access.

Conditions for work: Poor working conditions in food processing and supply chain environments.



Sourcing: Procurement of high-risk foods across maritime borders and within emerging economies. Products that apply here include cocoa beans, coffee bean nuts, wheat and sugarcane. Most importantly we have identified the key issues relating to the sourcing of these commodities that are known to be managing issues relating to child labour, forced labour, poor working conditions, migrant exploitation, low wages and poverty, gender discrimination and the lack of enforcement are all factors that are embedded in opaque supply chains that make unethical practices hard to identify, manage and eradicate.

Suppliers' networks: Engagement with supply chain networks operating in high-risk geographies (local and international) where modern slavery and human rights risks exist.

Food Fraud: The potential for the engagement in practices designed to conceal slavery like methods that would otherwise be identified within an assessment process (e.g., audits)

ACTIONS TO ADDRESS MODERN SLAVERY

RiteBite Group is committed to eradicating modern slavery practices within the communities in which it operates. This commitment is embodied in our policies and procedures that drive awareness, education, and ethical, legally compliant business conduct.

Key documents capturing our workplace ambitions, actions, and processes include:

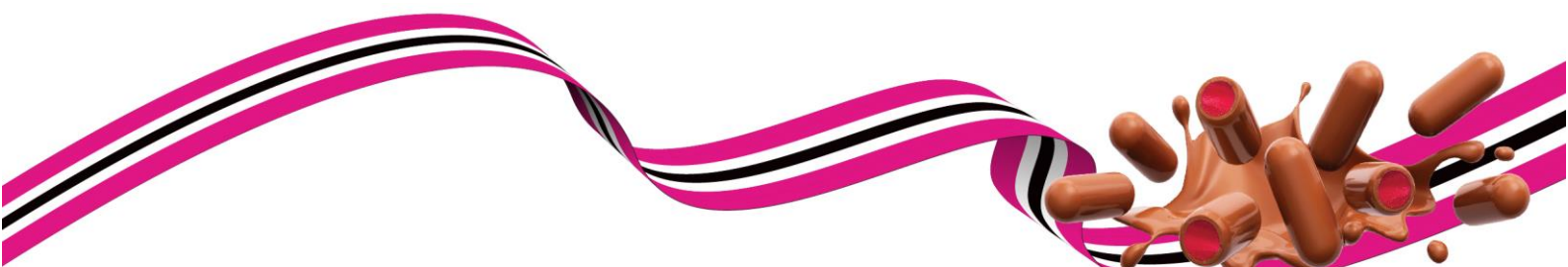
- Code of Conduct
- Ethical Sourcing Policy
- Recruitment Policy

EDUCATION AND TRAINING

RiteBite Group provides annual education and training for all key policies above mentioned. This training is conducted annually, during onboarding and in real-time settings as part of formal and informal training environments that include case studies and toolbox talks.

ENVIRONMENTAL SOCIAL AND GOVERNANCE (ESG) STRATEGY

RiteBite Groups ESG strategy is primarily tasked to ensure we provide the relevant education and training for all employees to ensure individuals understand human rights, forced labour risks, and key actions and standards we must uphold within our supplier and partner networks. As part of this strategy we have a committee that is accountable to and responsible for ensuring Modern Slavery standards are met and actions are aligned to eradicating these practices within our community.



PARTNERSHIPS

RiteBite Group is a proud partner with Cocoa Horizons Foundation. This foundation is committed to the sourcing of sustainable cocoa for all our products to ensure we are supporting self-sustaining farming communities, with deforestation and zero child labour. Moreover, this fund contributes to key Inclusion, Diversity and Equity principles in the delivery of key programs to improve capability and agricultural practices, community development, empowerment of women, child protection and child labour monitoring programs, access to safe drinking water and key sanitation projects.

RiteBite Group strives to influence and support the community by ensuring that our suppliers and retail partners do not engage in practices related to modern slavery. Darrell Lea is the largest brand in RiteBite Group's portfolio, and we are proud that all Darrell Lea branded products are 100% palm oil free, making Darrell Lea the largest palm-oil free confectionery brand in the world.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

RiteBite Group is dedicated to contributing to the eradication of modern slavery practices. To achieve this, we have implemented the following processes:

1. Ensuring all staff, partners and suppliers are aware of our commitment to modern slavery and the importance of adhering to the applicable policies and procedures.
2. Investigating all reports from employees, partners, suppliers, consumers, and law agencies indicating the presence of modern slavery practices.
3. Conducting reviews and audits of our supplier network to ensure adherence to and promotion of practices aimed at eradicating modern slavery.
4. Establishment of an ESG Committee which includes Shareholder representation, Executive Sponsors, Functional Leaders, SME's (Subject matter experts) and volunteers who are responsible for the delivery and continual improvement of workplace standards, practices training and monitoring of modern slavery risks.

OUR FUTURE COMMITMENTS

RiteBite Group will focus on the following for the next reporting period:

1. Policy
 - Annual review of modern slavery standards within our policies and procedures.
2. Supplier Standards
 - Regular audits conducted with all our Tier 1 Supplier network to ensure adherence to our Ethical Sourcing Policy.
3. Leadership
 - Providing education and awareness to embed a culture of identification and reporting.
 - Executive reporting on modern slavery practices and improvements on a quarterly basis



4. Employee Training and Awareness
- Developing training for staff on modern slavery risks and impacts

RiteBite Group remains committed to improving our efforts to combat modern slavery and looks forward to sharing our progress and advancements in future reports.

This Modern Slavery Statement has been approved by the RiteBite Board and will be reviewed and updated annually to reflect our ongoing commitment to combating modern slavery and human trafficking.



James Ajaka
CEO AND EXECUTIVE CHAIRMAN
RITEBITE GROUP PTY LTD

