

MODERN SLAVERY STATEMENT

REPORT FOR THE FINANCIAL YEAR ENDED
30 JUNE 2021

Noumi Limited ACN 002 814 235



Executive Summary

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking.

Noumi Limited and its related bodies corporate (collectively, **Noumi** or the **Group**) comply with all applicable laws including, without limitation, laws relating to modern slavery, anti-slavery and anti-human trafficking.

The Group is committed to, and expects its contractors, customers, distributors, suppliers and other business partners to also be committed to:

1. acting ethically and with integrity in all aspects of business;
2. implementing effective systems and controls to ensure modern slavery in any part of their supply chains is not tolerated; and
3. transparency in the approaches to tackling modern slavery in line with the disclosure obligations under the Modern Slavery Act 2018.

The Group is committed to assessing, monitoring and mitigating the risks of modern slavery and broader human rights risks in its organisation supply chains in line with the Group's corporate values, stakeholder and community expectations and the law.

CRITERIA 1 & 2

IDENTIFY THE REPORTING ENTITY AND DESCRIBE ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Reporting Entity

- The reporting entity is Noumi Limited ACN 002 814 235.
- Noumi is registered as an Australian Public Company with annual revenue that exceeds the Modern Slavery Act's minimum mandatory reporting threshold of \$100 million.
- Noumi is Australian owned and operated and is listed on the Australian Stock Exchange (ASX: NOU).

Structure & Operations

- The Group is a leading producer of long-life dairy and plant-based beverages and nutritional products for the domestic and international markets.
- The Group employs approximately 580 employees globally with over 90% of employees based in Australia.

Supply Chain

- The Group's supply chains span across the globe and across its business sectors including its manufacturing, sales, distribution and general business activities.
- The majority of the Group's material suppliers are Australian, including its milk and packaging suppliers.
- The Group has approximately 55 direct milk suppliers from dairy farms across Australia.
- In addition to its milk suppliers, the Group has 35 key raw materials and packaging suppliers, the majority of which are Australian.
- The Group has mapped out its supply chains and consolidated the data into its material suppliers by total dollar expenditure. This data will be the principal focus area for ongoing analysis in each future reporting period and will be updated accordingly.



CRITERIA 1 & 2

IDENTIFY THE REPORTING ENTITY AND DESCRIBE ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Noumi recognises the impact of Covid-19 and the potential to an increased risk to modern slavery in parts of the operations and supply chain. Noumi has put into place corrective actions to increase the awareness and reduction of the Covid-19 impact through Policies, Risk Assessments and Awareness Training,

Noumi is working with key suppliers during the reporting period to review supply agreements and supply chain suppliers statements as part of the invoicing and service level agreements in line with Noumi Modern Slavery Policy to ensure risks linked to evolving supply chains and changing workforce structures are identified and addressed. A link to the Noumi internet page is included on all invoices and payment agreements for access to the Noumi Policies and Modern Slavery Statement.

Noumi is addressing operational risks associated with the impact of employees wellbeing and earning incomes by providing workers with protective equipment, providing sick leave or carers leave, and increasing cleaning in factories and buildings to minimise risk of infection. Employees, Contractors and Visitors must abide by Noumi policies whilst on site which includes the Covid-19 requirements to be fully vaccinated, complete inductions and declare their wellbeing prior to entering site through the access software systems.

CRITERIA 3

DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY AND ANY ENTITIES IT OWNS AND CONTROLS

Risks

- During the reporting period, the Group completed a risk assessment to understand the modern slavery risks within its operations and supply chains. The risk assessment was based on principles promulgated by the Social Responsibility Alliance (**SRA**).
- Within the Group's operations, migrant workers account for a proportion of its workforce. Some of these migrant workers are directly employed by the Group and others are employed through third party employment services providers. While many of the Group's migrant workers are Australian permanent residents, the Group recognises the increased vulnerability of migrant workers and continues to take steps to uphold and maintain all work rights and ethical standards.
- The Group's management processes, including working rights checks (both initial and ongoing) and onboarding procedures, has resulted in a low risk assessment of modern slavery in relation to its migrant workers.
- We assessed the latent modern slavery risk within the Group's supply chain by converting Noumi's procurement data into standardised social risk metrics. We then analysed these metrics by comparing them to five social risk databases. The results of our assessment indicated that:
 - Compared to our global benchmark, the Group's overall modern slavery risk is low, and its main purchased ingredient - Australian dairy milk – also carries a low-risk likelihood.
 - The higher categories of modern slavery risk that the Group prioritises through ethical sourcing audits are paper, powder, straws and pastes.
 - The tendency is for higher risk categories to be driven by the labour-intensive nature of the relevant processes behind each categories' main commodities e.g., human rights risks in harvesting timber for paper products or rice or nuts etc. and their sourcing locations.

CRITERIA 4

DESCRIBE THE CONTROLS AND THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITIES IT OWNS OR CONTROLS TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES



Sedex is an organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains. Sedex provides practical tools, services and a community network to help companies improve their responsible and sustainable business practices, and to source responsibly.

- Annual audits by customers who use Sedex require the Group to supply data and satisfy the Sedex requirements which are confirmed during the site visits.
- The Group is committed to achieving the following equal employment opportunity objectives:
 - ensuring that all recruitments and promotions are based on objective assessments to determine the best qualified candidates for the role
 - ensuring all employees are treated fairly in a safe and respectful work environment through internal policies and company culture; and
 - fully utilise and develop the potential of every employee.

- The Group has policies, programs and processes in place to mitigate modern slavery risks across its operations and supply chains. These include, but are not limited to:
 - ensuring all Group team members hold relevant working rights in Australia and ensuring compliance with all visa conditions where applicable;
 - training for team members covering fundamental governance principles, including the Groups code of conduct, grievance mechanisms, workplace behaviours;
 - resources dedicated to human resource management and policies to address modern slavery and anti-human trafficking;
 - high union membership and engagement;
 - resources, systems and processes to administer team member payments; and
 - incorporating obligations within its contracts with third- parties to mitigate modern slavery risks in its supply chains both up and down stream.

CRITERIA 4 continued

DESCRIBE THE CONTROLS AND THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITIES IT OWNS OR CONTROLS TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

Controls & Actions

- The Group utilises third-party systems and databases to guide and streamline its supplier risk assessment process which requires suppliers to complete questionnaires through Sedex and utilises the Slavery & Trafficking Risk Template developed by the multi-stakeholder consensus based consortium of organisations, the Social Responsibility Alliance (SRA). These questionnaires:
 - Help the Group obtain key factual data about the supplier's operations which can be used to support risk assessments outside the platform;
 - Allow the system itself to generate an initial risk profile; and
- Provide a repository of suppliers and key details to assist program administration.
- Once a supplier risk is identified, suppliers may be required to undertake an ethical audit. In most circumstances, suppliers assessed as high risk will require an audit every 12 months and a supplier assessed as moderate risk will require an audit every two years.
- Through suppliers' participation in the Group's risk assessment processes, the Group can monitor and evaluate its upstream supply chain and take appropriate actions to mitigate risks.
- While non-conformances identified during these risk assessments and audits have not identified any confirmed cases of modern slavery, the Group will continue to monitor its operations and supply chains for any indicators of modern slavery risks being present.



CRITERIA 5, 6 & 7

DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF THESE ACTIONS, THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS and ANY OTHER RELEVANT INFORMATION

Effectiveness

This is the second review of the modern slavery risks across the Group's operations and supply chains. As such, further assessment of the Group's controls and actions have been undertaken in this reporting period.

This initial process has increased transparency and awareness of modern slavery risk across the Group's operations and supply chains and this will continue going forward with each report period.

Consultation

The review that was undertaken in preparation for this modern slavery statement included a review of the operations of the entities which Noumi owns or controls.

Any other relevant information

The Group believes that its continued efforts to assess, monitor and mitigate modern slavery will further contribute to its ethical culture across the business and increase awareness of the importance of the abolishment of modern slavery throughout its supply chains.

The Group also has various other policies that ensures best practice corporate governance including without limitation its [Anti-Bribery Anti-Corruption Policy](#), [Code of Conduct](#), [Equal Opportunity and Diversity Policy](#), [Risk Management Policy](#) and [Whistleblower Improper Conduct Policy & Procedure](#).

ENDORSEMENT

THIS MODERN SLAVERY STATEMENT HAS BEEN
ENDORSED BY THE BOARD OF
NOUMI LIMITED



GENEVIEVE GREGOR
CHAIR OF THE BOARD