



# Joint **Modern Slavery** Statement

Financial Year Ending 30 June **2024**







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# A message from our CEO



It is with great pleasure that I share our fifth Modern Slavery report for the financial year (FY) ending 30 June 2024.

Under the careful governance of our Modern Slavery Committee, we stay proactively informed and guided by the leading sources of information about the current prevalence, type and location of modern slavery risks in our industry. We do this to ensure genuinely impactful strategies for risk mitigation are developed.

This diligence has led to the further prioritisation and focus on the purchase of one of our largest commodities', cocoa, which has been flagged in the Global Slavery Index 2023<sup>1</sup> as a potentially high-risk ingredient when imported. Our procurement strategy to source this ingredient through local suppliers together with the delivery on our promise to ensure that 100% of our cocoa (up

from 17% in FY22) is Rainforest Alliance (RA) sourced has delivered meaningful progress in respect of our modern slavery risk mitigation this reporting period. RA has very strict certification requirements about safe and healthy working conditions which are very much aligned with our own five core values.

Our investment made during the last reporting period in the software platform ETHIXBASE360 continues to deliver us the transparency we need in our supply chain to manage modern slavery risks well. I am extremely grateful to our supplier base for their trusted partnerships and cooperation with us, which saw the response rate to our Modern Slavery Questionnaire (MSQ) increase from 33.4% to 75.9% this reporting period. There is still work to be done on continuing to raise the number and quality of supplier responses and I remain personally committed to following up high value suppliers who do not complete the MSQ.

It is encouraging to see that our supplier base are largely in the low to moderate risk range with a very low number of high-risk suppliers, which is indicative of our continued focus on local manufacturing and sourcing strategies. I am proud to share that all remediation action plans promised in our last report were fulfilled resulting in high-risk suppliers being eliminated from our vendor lists.

Lastly, our people right across the organisation have been provided with engaging communications, education and training about our Business Code of Conduct to ensure that the principles contained in that Code, particularly relating to human rights and labour practices, are well understood and prioritised.

As we continue to grow as a business in pursuit of our purpose to proudly bring families together with delicious homegrown food made with care, we remain uncompromising in the commitment made by the organisation and all of our people to continuously strive to do better for our people and our communities.

Esme Borgelt  
CEO

## Core Values



**we are  
driven**



**we are  
real**



**we  
care**



**we are  
proud**



**we are  
different**

1. <https://www.walkfree.org/global-slavery-index/>





## Introduction



**Kinrise Pty Ltd (ACN 143 389 404) (Kinrise) is an Australian food company with a diverse portfolio of Australian food businesses united by shared values, shared leadership, and a shared view of the future of food in Australia.**

This is the fifth Modern Slavery Statement submitted by Kinrise pursuant to the Modern Slavery Act 2018 (Cth) (Act). It sets out the approach and actions taken by the following related entities of Kinrise (all of which are reporting entities for the purposes of the Act) to identify, assess and address modern slavery risks in the Group's operations and supply chain over the financial year ending 30 June 2024 (Statement):

- (i) Kin Group Pty Ltd (ACN 095 313 714) (ultimate holding company) (Kin Group);
- (ii) Kinrise Pty Ltd (ACN 143 389 404) (Kinrise);
- (iii) Greens General Foods Pty Ltd (ACN 001 553 564); and
- (iv) Green's Food Holdings Pty Ltd (ACN 160 202 200).

Unless expressly stated otherwise, each of the reporting entities listed above and their controlled entities as defined in the Act and listed on page 4, are referred to in this Statement as "the Group" or "our Group".

The Groups registered office is located at Level 16, 644 Chapel Street, South Yarra, Victoria 3141.







## Our structure, operations and supply chains

**Kin Group and its controlled entities comprise an Australian privately owned investment business that own and operate large industrial, manufacturing, technology, and retail businesses worldwide.**

Kin Group is the ultimate holding company of Kinrise. Kinrise is the parent company of the following broad portfolio of related entities:

- (i) Greens General Foods Pty Ltd (ACN 001 553 564);
- (ii) Green's Food Holdings Pty Ltd (ACN 160 202 200);
- (iii) Green's Intellectual Holdings Pty Ltd (ACN 165 758 298);
- (iv) Waterwheel Premium Foods Pty Ltd (ACN 162 115 611);
- (v) Green's Biscuits Pty Ltd (ACN 167 337 439);
- (vi) Ozpack Holdings Pty Ltd (ACN 115 009 151);
- (vii) Propax Pty Ltd (ACN 101 942 312);
- (viii) OLHS Pty Ltd (ACN 127 870 008); and
- (ix) Key Partnerships Australia Pty Ltd (ACN 109 800 937);
- (x) Burst Foods Pty Ltd (ACN 619 846 114);
- (xi) The Cake Syndicate Pty Ltd (ACN 150 924 726).



Kinrise operations (and its controlled entities) expand across the areas of developing, manufacturing, packaging, marketing, and sale of food products. Kinrise operations are based in Australia with manufacturing sites in NSW, Victoria and Queensland meaning that all our food products are manufactured only in Australia.

**We operate across four different categories:**



**Snackfoods**



**Pantry  
foods**



**Baking &  
Bakery**



**Biscuits**





Kinrise employs 667 team members throughout the Group's operations. We strive to purchase all our ingredients for the food we make from Australia. At present, 78% of our Kinrise branded products are made with at least 70% Australian ingredients.

Our products are manufactured for supply across Australia and for export to the Americas, Oceania and Asia.







## Kinrise manufactures food under the following brands:



### The supply chain of products and services that contribute to our Group operations include:

- (i) raw ingredients;
- (ii) packaging;
- (iii) warehousing, cold storage, freight, and distribution services;
- (iv) manufacturing equipment, and installation and commissioning services;
- (v) labour hire services;
- (vi) personal protective equipment;
- (vii) professional, legal, financial, marketing services; and
- (viii) utility services.



In the 2024 financial year, our Group partnered directly with 1130 suppliers. Of those, 46 were international suppliers, including New Zealand, USA, Poland, Singapore, Netherlands, Indonesia, China, Austria, Great Britain and Canada (listed in order of spend). The spend in New Zealand was related to ingredients and raw materials.

Our spend in the USA relates almost entirely to specialised packaging materials, and the spend in Poland relates to the purchase of capital equipment for our manufacturing facilities. These 46 international suppliers make up 3.5% of our total Group spend. The 1084 other suppliers were all based in Australia.





# Potential risks of modern slavery

We have identified several areas of potential risk in our operations and supply chain which we explore below.

## 1. Labour Hire

A number of the Group's operations engage labour hire providers to provide temporary labour. The use of occasional labour hire providers are deemed as low risk, due to the stringent requirements we have in place for these services, and which are audited by us, from time to time. The efforts we are making with respect to reducing any potential risk are outlined on page 9 of this report.

## 2. Manufacturing equipment & packaging

The Group's largest category of spend with international suppliers during this reporting period was on manufacturing equipment and packaging, primarily sourced from the United States of America, Germany, Japan and New Zealand. According to the Global Slavery Index 2023<sup>2</sup>, these countries are not deemed high risk countries, which is supported by our risk analysis in Ethixbase.

## 3. Manufacturing processes

According to the Australia Red Cross Addressing Modern Slavery Guide for Australian Businesses<sup>3</sup>, the manufacturing sector is one of the industries where most cases of forced labour occur globally. Specifically, the report highlights that globally some manufacturing workers are required to work excessive hours, often have their passports illegally retained and can face illegal imprisonment and physical abuse.

The Group's operations include administrative, sales, marketing and manufacturing functions. All the Group's operations, including the manufacturing function are only based in Australia which according to the Global Slavery Index 2023<sup>4</sup> is inherently a low-risk jurisdiction.

Further, the potential risk in our manufacturing workforce is reduced as all employees are engaged under a contract of employment which clearly sets out terms and conditions regarding their role, their hours of work and their pay. All terms and conditions comply with local laws. Our front-line employees across our sites are paid for all time worked and their time and attendance is securely recorded to ensure that their pay is accurate and meets all obligations under Australian law.

We believe our Business Code of Conduct for our employees (including our entire manufacturing workforce) continues to contribute to a further reduction of any risk of modern slavery in our local manufacturing processes, as the Code sets out our policies, complaint procedures and provides for anonymous whistleblower complaints to be made to an independent third party. Further, the specific details are provided in page 15 of this Statement below.

2, 4. <https://www.walkfree.org/global-slavery-index/>

3. Australia Red Cross Addressing Modern Slavery Guide for Australian Businesses Feb 2020







## Potential risks of modern slavery

### 4. Purchase of higher risk raw materials

In the course of our Group operations, we purchase raw materials including cocoa and sugarcane. According to the Global Slavery Index 2023<sup>5</sup>, cocoa and sugarcane, when imported into a G20 country, are products that are potentially at risk of modern slavery. We are cognisant of the findings in the latest Global Slavery Index<sup>6</sup>, specifically in relation to the cocoa sector, that “the farming and harvesting of cocoa beans are particularly vulnerable to forced labour, trafficking, and the worst forms of child labour”.

We are pleased to report that our Group sources these raw materials through local suppliers to help minimise risk in relation to supply of these materials. Our Group sources sugar which is grown and supplied directly from an Australia grower/manufacturer. Cocoa, one of our largest commodities, is also sourced from an Australian manufacturer of chocolate and confectionary.

In our last report, we committed to ensure that 100% of the total cocoa sourced by the Group was Rainforest Alliance (RA) sourced. Our new agreements now reflect this. This is an increase from the two prior reporting periods (94% in FY23 and 17% in FY22), demonstrating the Groups commitment to review of its sourcing strategy to ensure meaningful progress is made in respect of modern slavery risk mitigation.

Products that obtain RA certification<sup>7</sup> comply with strict requirements. RA certified farms and companies are audited by independent certification bodies. RA certification requirements include good agricultural practices and farm management, safe and healthy working conditions, addressing child and forced labour, and protection of the environment.

RA trains farmers around child labour laws and promote gender-equality and non-discrimination. They are also focused on creating better livelihoods for farmers and farm workers that enable them to afford a decent standard of living<sup>8</sup>. Since 1987, the RA has worked to build a global alliance of people with a shared vision of a world where people and nature thrive in harmony. Today, they work in 62 countries around the world to protect forests, improve the livelihoods of farmers and forest communities, promote their human rights, and help them mitigate and adapt to the climate crisis. The RA is committed to measuring and assessing their impacts on the ground, so they can continuously improve the effectiveness of the certification program and landscape management work.

By sourcing RA certified cocoa, Kinrise joins a group of allies all committed to contributing to deep-rooted change on some of the most pressing social and environmental issues of our time. Kinrise are committed to continuing to source 100% RA certified cocoa and have ensured that our contracts with suppliers stipulate this requirement.

5,6. <https://www.globalslaveryindex.org/>

7,8. <https://www.rainforest-alliance.org/>







## The actions we take to assess and address potential risks

We manage modern slavery risks in various ways. We are dedicated to a continuous improvement approach to best and most effectively manage risks and seek to highlight below all the positive progress made and any evolutions in our approach during this reporting period.

### 1. The modern slavery committee

The foundation of our governance approach is managed by our Modern Slavery Committee (the Committee). The Committee is comprised of key leaders of the Group across multiple relevant functional areas of the business including People & Culture, Procurement, Legal, Finance and Food Safety and Quality.

During this reporting period the Committee met three times.

The Committee is chartered by a documented three-year road map (the "MS Roadmap") which ensures appropriate prioritisation of activities for Kinrise to deliver on to manage any potential risks in our supply chain and operations. This MS Road Map allows the Committee to efficiently monitor progress and timing on all key deliverables.

In our last report, we promised an ongoing commitment by the Committee to delivery of all key initiatives in the MS Roadmap and we are pleased to report that all initiatives were actioned in this reporting period. Some of the key highlights of actions initiated and/or taken by the Committee in its efforts to effectively identify and manage the potential risks are included in this section of the report in more detail.



*One of our core values is We Care and that means always striving to do better for our people and our communities.*







## 2. Investment in technology

ETHIXBASE 360

Our relationship, and agreement to engage with and implement the use of a world-class third party software platform called Ethixbase360 (Ethixbase) continues to go from strength to strength. Our use of this software has provided us with quality incremental data and information about our supplier base that has enabled us to more closely monitor and action modern slavery risks that may arise in our supply chain. Our use of Ethixbase has been revolutionary to the Group's capability to understand the deeper layers of our supplier universe and to ensure that any high risk suppliers are identified so that remediation action plans can be put in place where necessary.

This platform is a software solution that gives us full and detailed transparency into our third-party supplier network. It has the following key features that contribute to our efforts to identify, manage, mitigate and report on the risk of modern slavery in our supply chain:

- *Risk Assessment*: an innovative easy to complete modern slavery questionnaire (MSQ) allowing us to engage with our suppliers.
- *Risk Based Due Diligence*: Based on risk ratings from data collated in the MSQ.
- *Reporting and Analytics*: Critical data enabling us to strategically address risks.
- *Ongoing Monitoring*: Alerts when status changes occur allow for swift follow up action.

## 3. Supplier response and remediation

During this reporting period suppliers were requested to respond to our MSQ and all responses were assessed in accordance with the Ethixbase risk assessment criteria to determine the risk profile of our supplier base. This involved running several due diligence reports to delve into the market relationships and activities of our suppliers to identify key risks.

The procurement team provided regular updates to the Modern Slavery Committee and presented to the CEO on the progress of each of the milestones captured in our MS Roadmap.

We are pleased to report:

- The two (2) suppliers we identified from our MSQ in the prior reporting period (FY23) as high risk were put on a risk remediation action plan. In our last report, we committed to share details of the actions taken during this reporting period in respect of these two suppliers, and can confirm that both of these suppliers have been eliminated from our vendor list.
- In our last report, we committed to continued focus on our supplier engagement strategy. We are pleased to report that our MSQ response rate has significantly increased from the previous reporting period from 33.4% to 75.9% (see image 1). This is due to ongoing efforts to engage with our suppliers and encourage response rates through all levels of the business.

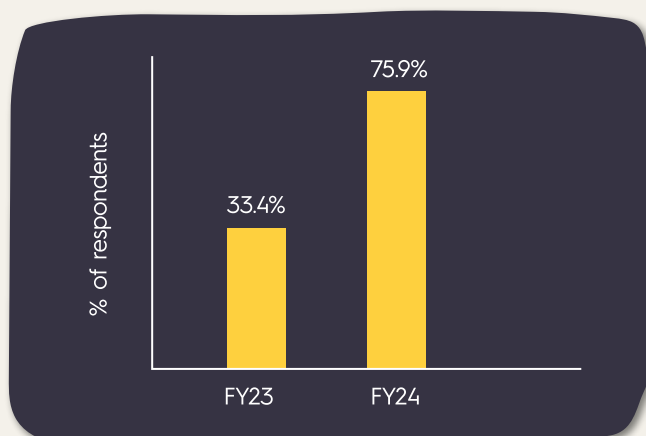


Image 1: % of respondents to MSQ



## Supplier response and remediation continued

To improve our response rate, we prioritised clear and supportive communication with suppliers to ensure the MSQ and our position on Modern Slavery was well understood. We also offered additional support to make the process easier for suppliers. Providing resources, FAQs, and designated points of contact for assistance alleviated confusion and encouraged completion of the MSQ. We set clear deadlines and sent timely reminders to help keep suppliers accountable.

In our last report, we made a commitment to ensure that our approach with our suppliers was commensurate with their risk levels. In this reporting period, through the supplier submissions on Ethixbase, several suppliers were initially flagged with potential risks. Subsequently, we undertook a more in-depth risk assessment of those suppliers which resulted in a reclassification of those suppliers to low or moderate risk in our ETHIXBASE rating system, as a consequence of the due diligence process we applied.

As an additional precaution, and regardless of the low-risk rating associated with two of these suppliers, we have put both of these suppliers on a risk remediation action plan out of an abundance of caution around human rights risks. We will report on the detailed remediation plan and any outcomes and in our next report, where we will illustrate our approach in the form of case studies on these suppliers.

Below is a snapshot of the completion status of all MSQ's issued by the Group as at 30 June 2024:

Total	In Progress	Completed	Not Started	Alternate End State
<b>278</b>	<b>5</b>	<b>161</b>	<b>62</b>	<b>50</b>
	1.8%	57.9%	22.3%	18%



Image 2: Supplier Business Operations Mapping as at 30 June 2024





## Supplier response and remediation continued

The responses to our MSQ allow us to:

- Identify the dispersion of our suppliers around the world (see image 2 on page 11) as well as track their production chain;
- Understand our indirect suppliers better;
- Identify suppliers that present the highest risk; and
- Formalise a commitment and adherence to our Supplier Code of Conduct (included on page 14 of this report).

The MSQ is treated as mandatory for any supplier wishing to participate in new supply tenders. During this reporting period, we issued 33 tenders and had a 100% response rate from participants. Our CEO is committed to initiating 1:1 follow ups for high value suppliers who have not completed an MSQ.

The MSQ measures risk and assigns a score on a scale to a supplier. During this reporting period, as identified in Image 3 (below left), overall Kinrise suppliers present on the lower end of the moderate risk range.

Image 4 (below right) provides a visual representation of the percentage of each supplier who has responded by 30 June 2024 in each of the risk categories:

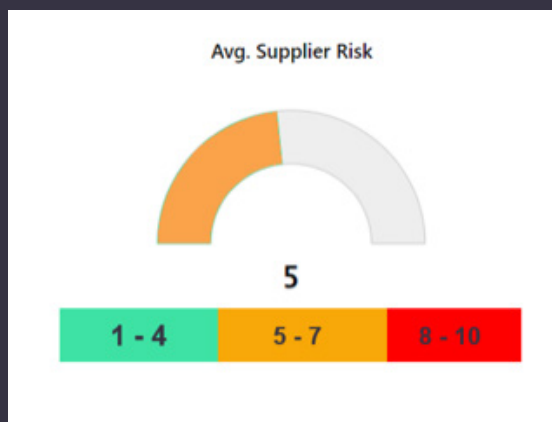


Image 3: Average Supplier Risk as at 30 June 2024



Image 4: Supplier Risk Categorisation as at 30 June 2024





#### 4. Ongoing commitment to the Kinrise Supplier Code of Conduct

The Kinrise Supplier Code of Conduct Code included on page 14 can also be found on our website [www.kinrise.com.au](http://www.kinrise.com.au).

The Code sets out the standards and requirements which Kinrise requires all our suppliers to meet and will enable us to build greater clarity of our expectations in onboarding and via our contractual relationships with suppliers including as it relates to respecting human rights, providing safe workplaces and ensuring fair salary and working conditions.

Our staff and suppliers have all been made aware of its existence, its importance and its key principles. Internal and external communications issued in respect of this Code have made clear the Groups expectations around the criticality of compliance with its principles and the Codes alignment with Kinrise values which include uncompromisingly high standards of quality, integrity, compliance with the law and a deep respect for human rights.

We have a dedicated supplier email address for any enquiries about the Code with the inbox managed by Head of Procurement for all enquiries. In this reporting period, we have had no enquiries about the Supplier Code of Conduct, however, having this dedicated supplier email address facilitated excellent collaboration between our procurement division and supplier base about use of and compliance with our new MSQ issued via our software platform ETHIXBASE detailed on page 10 of this report.







## Kinrise Supplier Code of Conduct

### Our Values and Commitments

At Kinrise, we are driven by our purpose and mission.

Our **purpose** is to proudly bring families together with delicious homegrown food we've made with care.

Our **mission** is to create moments of joy.

We also believe that how we achieve our results is as important as the results we achieve so we are committed to championing and living our five core values:



As Kinrise continues to grow, so does our responsibility to each other, our communities and our consumers. We are committed to respecting human rights and implementing responsible workplace policies and practices. We expect all our supply chain partners to have those same commitments.

This Supplier Code of Conduct sets out the requirements and standards which Kinrise requires all our suppliers to meet. This Code will apply to all suppliers. Kinrise reserves the right to verify compliance with this Code and to terminate any contract, arrangement or understanding if the supplier does not comply with this Code.

### Obey the Law

Comply with all local and national laws that apply to your business operations and your dealings with Kinrise.

### Act with Business Integrity

Conduct your business with honesty, integrity and commitment to the highest standards of ethical conduct. Do not engage in, encourage, or permit unlawful or unfair trade practices or any method of obtaining undue or improper advantage, including bribery, corruption, extortion or embezzlement.

### Respect Human Rights

Do not engage in any form of modern slavery as defined in the *Modern Slavery Act 2018* (Cth) and local laws. Adhere to international human rights laws and principles\*.

### Protect the Environment

Conduct your business to protect and preserve the environment.

### Provide a Safe and Healthy Workplace

Provide a secure, safe and healthy workplace. Minimise the risk of accidents, injury and hazards inherent in the working environment.

### Salary and Working Conditions

Pay your employees fairly, relative to industry and local standards and at least in accordance with all relevant laws and agreements. Make sure your employees' working hours are not excessive such that their health or safety are negatively impacted and comply with all laws in relation to work hours and overtime.

### Respect Employees' Rights to Freely Associate and Collectively Bargain

Recognise and respect your employees right to freely associate, organise, and bargain collectively. Do not discriminate or retaliate against employees who exercise these rights.

### Maintain Grievance Procedures

Provide employees with a grievance process. Respect grievances without reprisal and ensure concerns are addressed in a timely manner.

### Do Not Discriminate

Do not engage in any form of discrimination including discrimination on the basis of age, race, colour, language, nationality, disability, ethnicity, religious belief, political views, gender, sexual orientation or marital status.

### Do Not Tolerate Harassment or Bullying

Ensure the work environment is free from actual or threatened harassment, abuse, bullying, and intimidation, whether physical, psychological, verbal, sexual, or otherwise.

### Implement Appropriate Management Systems

Develop and implement systems to ensure compliance with the law, this Code and respect for all human rights.

Use of the term "Kinrise" in this Code refers to Kinrise Pty Ltd ACN 143 389 404 and its related entities, Burst Foods Pty Ltd t/a Cobs Fine Foods ABN 67 619 846 114, The Cake Syndicate Pty Ltd t/a Susan Day Cakes ABN 19 150 924 726, Propax Pty Ltd t/a Ozpack ABN 16 101 942 312, Green's General Foods Pty Ltd ABN 56 001 553 564, and Green's Biscuits Pty Ltd ABN 26 167 337 439.

\* This includes the *United Nation Global Compact*, the *United Nation Universal Declaration of Human Rights*, the *1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work*, the *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children*, the *Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour*, and the *ETI Base Code*.

If you have any queries about this Code, please contact Kinrise on [suppliercode@kinrise.com.au](mailto:suppliercode@kinrise.com.au).

## 5. Ongoing commitment to the Kinrise Business Code of Conduct

The Kinrise Business Code of Conduct which applies to all employees helps ensure that our employees act in accordance with Kinrise's purpose and values. It guides all our business decisions, transactions and conversations and describes how we should act internally with each other and also with our customers, suppliers, key partners and stakeholders.

It includes detailed principles and expectations relating to treating people respectfully and fairly but also doing business in compliance with all applicable laws and regulations. We have a dedicated section of the Code documenting our expectations of employees in protecting and respecting human rights.

The Code makes clear that at Kinrise we oppose exploitative, inhuman labour practices including the illegal use of child or forced labour and that we ensure all employment is freely chosen.

The Code provides a direct link to our Kinrise Supplier Code of Conduct and makes it clear, amongst other things that we do not condone the violation of any labour and employment laws in the countries we do business and that we have a zero tolerance for Modern Slavery of any kind in our operations including human trafficking and the use of child, forced, indentured or involuntary labour.

In our last report, we noted future plans for the ongoing communication to, and education of, our staff regarding the principles housed in our Code. We are pleased to report that in this reporting period, we developed a comprehensive Code Communication and Education Activation plan across the organisation.

That plan was very comprehensive and included internal face to face and written communications about the importance of the Code and sharing real life practice case studies to all of our staff. We also developed a customised online training program compliant with current relevant legislation for all existing and new staff to complete which included a mandatory requirement to sign and acknowledge understanding of our Code.

We have ongoing plans for both communication and education to commence outside of this reporting period to keep the Code front of mind for all employees, details of which will be provided in our next report.





## 6. Training

All new starters who are salaried employees are issued within their first few weeks of employment with online compliance training modules in respect of Workplace Behaviours which must be completed within 30 days. These modules set the expectations from Kinrise for our employees in respect of ethical and illegal conduct including how to manage any associated incidents.

## 7. Company policies

The Group also has the following existing policies which are periodically reviewed for compliance with relevant legislation and requirements and to enhance the details relating to modern slavery occurrences:

- Equality and Diversity Policy
- Whistleblower Policy
- Work Health and Safety Framework
- Grievance Handling Policy & Procedure

Our Procurement Policy and Contracts Policy provide an excellent process and standard of governance regarding how we select suppliers and the level of contractual coverage (particularly in relation to compliance with our Codes of Conduct) to better manage modern slavery and forced labour risks in our supply chain.

This kind of critical analysis and decision making about our supply arrangements continues to be effectively managed by our centralised procurement function which tightly manages how we onboard, get to know and manage our supplier base with dedicated and proactive oversight and in strict accordance with these policies.

The Kinrise Whistleblower Policy states that any illegal and/or unethical conduct will be investigated and includes a hotline operated by an independent service provider that employees can contact at any time.

The Group's Diversity & EEO Policy states that all employees are entitled to be treated with dignity, courtesy and respect, work free from discrimination, bullying and harassment, and have the right to raise issues or make an enquiry or complaint without being victimised.

The Kinrise Work Health and Safety Framework sets out a thorough and compliant structure for the management of Health, Safety and Environment within the business.

The Group's Grievance Handling Policy states that all team members have the right to make a complaint to their direct team leader or another team leader and be treated with respect and impartiality throughout the process

We have supplementary compliance tools accessible for all employees on the company intranet that summarise these policies in a one-page Quick Guide to make comprehension and key principles clear for everyone and to ensure that awareness and understanding remains high for better compliance.



## 8. Third party contract terms

Our Kinrise master goods and services procurement agreement template includes contractual controls that:

- allow Kinrise to request a written report addressing the supplier's measures to identify the risks of modern slavery practices;
- require the supplier to represent and warrant to Kinrise that the supplier, to the best of its knowledge and belief and as at the date of entering into the agreement with Kinrise or a member of the Group, does not, and will not, use any form of modern slavery in performing its obligations under the agreement;
- require the supplier to notify Kinrise if it becomes aware of any risks that modern slavery will be used by the supplier; and
- in certain circumstances, require the supplier to develop and implement a Modern Slavery policy and due diligence processes in its operations.

Kinrise continues to engage labour hire service providers across our manufacturing sites in NSW & Victoria from time to time. We do not use labour hire at our manufacturing site in Queensland. Our labour hire service procurement agreement template includes provisions that require the labour hire service provider to ensure that any personnel employed by them to perform services on their behalf to the Group are properly characterised, engaged and provided with clear terms of employment that comply with all applicable laws. Other provisions ensure that the labour service provider ensures that any personnel are paid and provided all employment related entitlements and rights in accordance with all applicable laws.

In addition to the above measures, when sourcing the supply of products and services that contribute to our Group's operations, the Group continues to take into consideration whether the product or item can be sourced domestically in order to reduce the risk of modern slavery in the Group's supply chain.

The Group also has robust and consistent onboarding procedures for all labour hire workers before they attend on site that includes, amongst other things, proof of work rights documentation checks and online site induction in respect of all of the key policies highlighted in this report on page 16. All onboarding output is recorded and kept on file. Annual refresher inductions are provided during the period of engagement for labour hire personnel.

We have very clear and strong enforceable controls in place and are pleased to report that we have had no issues of non-compliance from suppliers regarding modern slavery practices.







## Measuring the effectiveness of our actions

During this reporting period, the Group's manufacturing facilities participated in SEDEX members Ethical Trade Audit (SMETA) audits. A SMETA audit is a social audit used by businesses to assess and understand if they are meeting responsible business practices and social compliance, such as, the working conditions at the business, health and safety of workers, human rights including labour force and child labour. Once an audit is complete, the business can then work to address any issues raised, based on a Corrective Action Plan.

During this reporting period, we are pleased to report that no significant modern slavery risks were identified. At Kinrise we follow the SMETA audit guidelines across all but one of our sites to ask the labour hire agency for proof of right to work documents for all workers on our premises and confirm the rates we paid them for fairness and to audit the process. During this reporting period, the SMETA audits conducted have not revealed any instances where this process was not managed in this way.

For the one Kinrise manufacturing facility that does not conduct SMETA audits (South Dandenong), key personnel from that business meet regularly through-out the contractual term with labour hire account managers to review contractual service KPI's and discuss any issues. During these reviews, random audits are conducted in respect of right to work documentation.

## Process of consultation with our subsidiaries

In the course of preparing this Statement Kinrise has consulted with each member of the Group specified on page 3, the Legal team, and the Kinrise Procurement team that has day-to-day accountability for sourcing the products and services in its supply chain that contribute to the Group's operations. During this reporting period, we are pleased to report no instances of non compliance.



## Future focus

During this reporting period, we are pleased to report no instances of non compliance. Our focus on the prevention of modern slavery is no exception. We have made excellent use this reporting period of our new software platform ETHIXBASE360 to gain greater transparency of our supply chain, and, to engage with our suppliers on risks identified by them in their responses to our MSQ.

Our investment in Ethixbase software has been instrumental in the positive progress made in respect of our supplier engagement strategy and we will remain committed to striving for a further increase in our MSQ response rate for the next reporting period. We will continue to ensure responses are received at the onboarding stage of new suppliers during our engagement and before final agreements are signed, allowing us to assess the risk before potentially exposing Kinrise.

We will share actions taken in the next reporting period to put in place meaningful risk remediation action plans for the two (2) suppliers identified as having human rights risks associated on page 11 with their organisations (despite not being high risk suppliers).

Our Kinrise Business Code of Conduct will continue to be positioned as the guiding document for all our staff on how we engage with each other and our external stakeholders. We have ongoing plans for both communication and education to commence outside of this reporting period to keep the Code front of mind for all employees, details of which will be provided in our next report.

This statement has been approved by the Board of Kin on behalf of the Group.

Raphael Geminder  
Director of Kin

Raphael Geminder  
Director of Kin

