



# Modern Slavery Statement

**Reporting entity's legal name:** Noumi Limited\*

**Reporting year:** For the Financial Year Ended 30 June 2024

**Australian Business Number (ABN):** 41 002 814 235

**Sector/Industry:** Manufacturing and Dairy Products

**Location:** Australia

**Employees as at 30 June 2024:** 524

Noumi Limited (Noumi) is committed to the protection of human rights. It strives to conduct business with its suppliers and customers in a manner that will fulfil our social responsibility to the protection of human rights and promotion of responsible employment. We recognise that issues such as forced labour, modern slavery and human trafficking continue to be endemic issues in global production and manufacturing, and as such, we continue to take the risk of modern slavery very seriously. Noumi does not tolerate any form of modern slavery or human trafficking in its supply chain and expects a high standard of human rights performance from everyone involved in its business.

## **ABOUT THIS REPORT**

This Modern Slavery Statement (**Statement**) is provided pursuant to section 12 of the Modern Slavery Act 2018 (Cth) ( **the “Act”**) and sets out the steps we have taken to identify, address and mitigate the risk of modern slavery in our operations and supply chain for the financial year from 1 July 2023 to 30 June 2024 (**Reporting Period**)

The Statement covers the entities listed in Appendix 1, which are wholly controlled subsidiaries of Noumi Limited\* and are the main operating entities in Australia.

# Criteria 2 - Structure, Operations & Supply Chain

## STRUCTURE

Noumi Limited (**Noumi**) is a public company listed on the Australian Stock Exchange (ASX: NOU), and in FY 24 reported a revenue that exceeds the Act's minimum mandatory reporting threshold. Noumi's registered office is in Ingleburn, New South Wales and, as at 30 June 2024, employed approximately 524 employees across four (4) principal locations:

- Ingleburn, NSW (head office and plant-based operational facilities);
- Shepparton, VIC (dairy operational facilities);
- Singapore (sales); and
- China (sales)



## OPERATIONS

Noumi's operations include:

- The manufacturing in Australia of dairy and plant-based milks, nutritional ingredients and sports supplements;
- The purchase and procurement from suppliers of ingredients and materials for use in the above manufacturing;
- The supply (either directly or via distributors) of Noumi's products into local and international consumer and business markets; and
- New product development and commercialisation of health and well-being focused beverage and nutritional products.

Noumi conducts its operations through various subsidiary entities. The main entities are:

- *Noumi Operations Pty Ltd* for supplier and procurement related business;
- *Noumi Trading Pty Ltd* for distribution and export business;
- *Noumi Dairy Trading Pty Ltd* for milk procurement;
- *Noumi Singapore Pte. Ltd* incorporated in Singapore for employment and operations in Singapore; and
- *Noumi Shanghai Co.Ltd* incorporated in China for employment and operations in China.

# Criteria 2 - Structure, Operations & Supply Chain (continued)

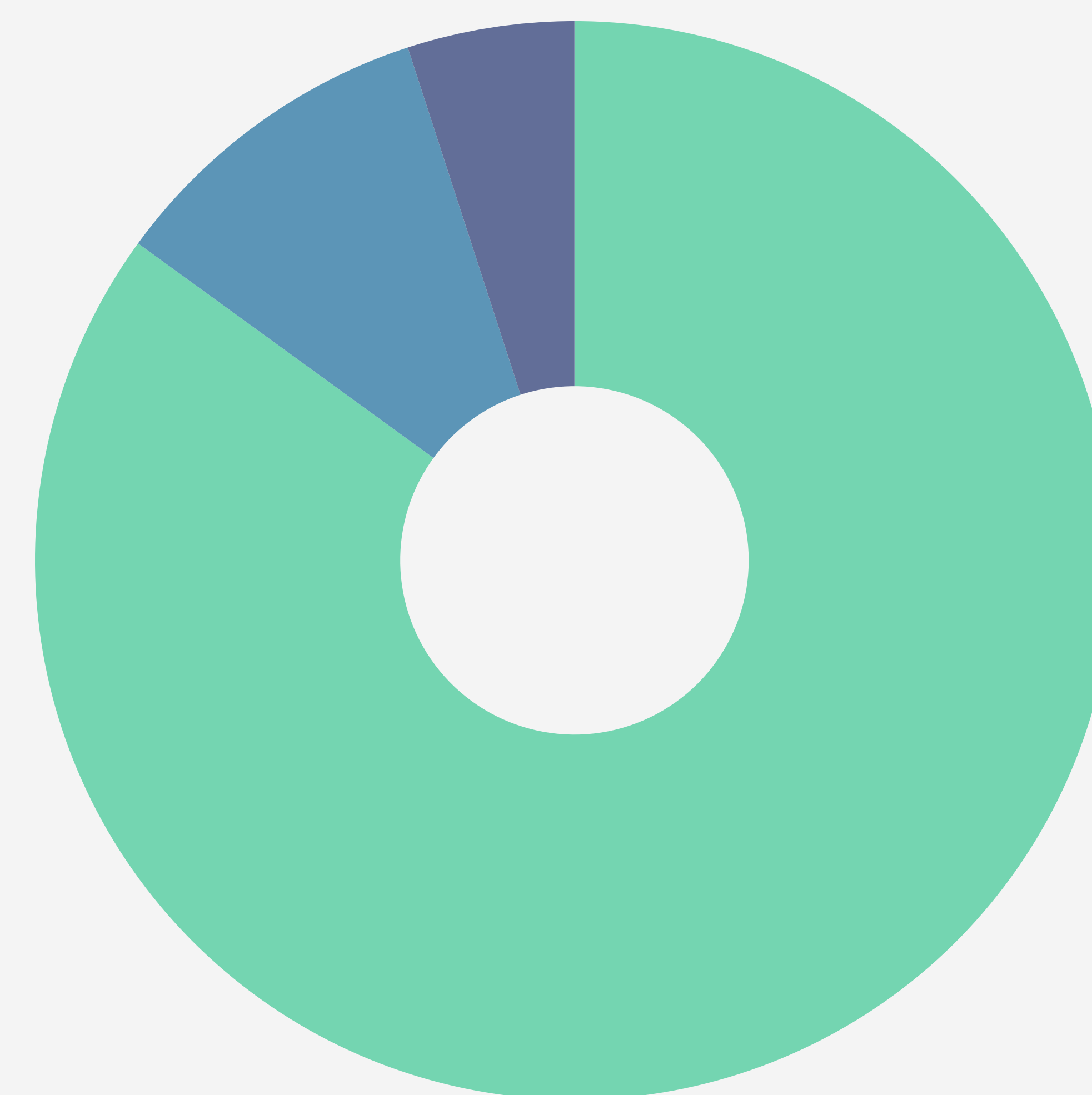
## SUPPLY CHAIN

Noumi's supply chain is broadly defined to include:

- The sourcing/collection of products (for example milk collection);
- The design, manufacturing and recycling of products;
- Logistics (i.e warehousing and transportation);
- Marketing and sales support (i.e advertising, public relations);
- Product distribution;
- Legal, Consulting, Recruitment and Insurance services; and
- Customer services and IT infrastructure services

Approximately 85% of Noumi's contracted suppliers are located within Australia, except for the following:

- International product distribution services (Asia, South East Asia, Arab States) ;
- Paper and consumables (China);
- General supplier services to assist in local management of overseas operations (South East Asia, China);
- Logistics and warehousing services (South East Asia, China); and
- Overseas marketing agencies (South East Asia, China)



- Suppliers in Australia (85)
- Suppliers in South East Asia (10)
- Suppliers in China (5)

# Criteria 3 - Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls

Noumi has assessed its modern slavery risks by reference to the modern slavery risk indicators set out in the Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities (**Guidance**).

## 1. Human rights and labour related risk

Noumi considers there is a low risk of modern slavery occurring within the supply chain and operations within Australia.

However, Noumi has a global supply chain for certain lines of business, including mainly, the export of its dairy and plant-based milks to the international market. As a result, Noumi is cognisant that it is exposed to various modern slavery risks, including violations of human rights and labour related issues. Noumi considers this risk is greater in countries where:

- The estimated prevalence of modern slavery per thousand people; and
- The vulnerability of modern slavery,

is reported as medium to high, according to the Global Slavery Index<sup>^</sup>. Noumi considers this to be in regions such as China, South East Asia and the Arab States. Specific risks include (but are not limited to), wage theft, unsafe working conditions, excessive working hours, physical abuse and/or bonded labour.

## 2. Sub-contracting and use of labour recruiters

Noumi recognises the use of labour recruiters and sub-contractors in its supply chain increases the risks of modern slavery, especially where recruitment fees are charged. Specific risks include deceptive recruiting for labour services and the employment of low-skilled migrant workers (directly or indirectly), who are vulnerable to forced labour exploitation and due to cultural and language barriers, may have limited knowledge of workplace laws in Australia.

<sup>^</sup>The Global Slavery Index is a national breakdown of the extent of modern slavery in 160 countries and is accessible online: <https://www.walkfree.org/global-slavery-index/findings/global-findings/>

# Criteria 4 - Actions taken to assess and address modern slavery risks

## HUMAN RIGHTS AND LABOUR RISKS (HIGH RISK GEOGRAPHIES)

### Supplier acknowledgement

Noumi has a number of global policies and procedures within its corporate governance framework to ensure it promotes activities that addresses human rights, labour, safety and health in order to comply with laws and regulations at the highest standards. These policies include:

- Anti-bribery & Anti-corruption;
- Code of Conduct;
- Equal Opportunity and Diversity Policy;
- Modern Slavery;
- Whistleblower and Improper Conduct Policy and Procedure

Although these policies are intended mainly for Noumi employees, in 2024, as part of its tender process, Noumi began issuing a 'Supplier Acknowledgement' declaration to prospective suppliers to confirm alignment to Noumi's commitment to conduct business honestly and fairly and in compliance with all laws and regulations.

As part of this process, potential suppliers are requested to review Noumi's suite of corporate governance documents (including Noumi's Modern Slavery Statement), and provide an undertaking to comply with Noumi's policies on responsible business for all present and future business dealings.

### Use of Sedex

Noumi, as a member of the Supplier Ethical Data Exchange (Sedex) encourages suppliers to provide their Sedex linking code at the time of initial engagement, to assess procurement risks and exchange supply chain information. The information and materials available via the Sedex platform assists Noumi to make informed assessments of modern slavery risks amongst its supply chain.

### Increased due-diligence - new overseas suppliers

In 2024, Noumi expanded its product distribution operations into South Korea and India. As part of the due diligence process, Noumi formed alliances in both territories with mature, well-established local companies. By doing business with such entities, Noumi has had visibility over specific ESG goals and targets for these entities, who operate in 'higher risk' geographies as recorded by the Global Slavery Index. Some of the initiatives taken by Noumi's contracted overseas parties, include:

- Structured ethics and compliance management programs (i.e ethical audits and the provision of ethical compliance management education);
- Enhancing safety and health prevention activities (i.e conducting workplace drills and establishing safety and health management guidelines);
- Promoting education, including special education and employment enhancing vocation skills, especially among women, elderly and the differently abled.

By engaging with overseas suppliers that share a commitment to safety, labour relations, diversity and inclusion and further, possess an internal system of practices and controls, ensures greater transparency and dialogue where modern slavery practices are identified at any point during the business relationship.

# Criteria 4 - Actions taken to assess and address modern slavery risks (continued)

## SUBCONTRACTING AND LABOUR RECRUITERS

### Contractual controls

Noumi mostly operates with its suppliers (domestic and international) under supply and/or sales agreements and terms and conditions. Where there is no sales and/or supply agreement in place, Noumi's standard terms and conditions of business will generally apply. Noumi's Modern Slavery clauses require both Noumi and the counterparty to:

- Comply with all applicable laws and Noumi's policies relating to modern slavery or human trafficking, including the Act,
- Take reasonable steps to ensure that there is no modern slavery or human trafficking in any part of their business and or supply chains,
- Confirm neither of its officers, employees or others associated with it, have been convicted or investigated for modern slavery or human traffic offences,
- Promptly report to the other party of any actual or suspected slavery or human trafficking in a supply chain,
- Maintain records evidencing its compliance with all applicable laws relating to modern slavery or human trafficking, and
- Grant the other party the right to audit it for the purposes of compliance with the above listed requirements.

Where non-conformance is dedicated, counterparties are required to co-operate in good faith with Noumi whilst it investigates any breach (or potential breach) of any anti-slavery laws. Most if not all of Noumi's labour recruiters contractually obligated to comply with anti-slavery laws.

### Internal Modern Slavery Policy

Noumi's internal Modern Slavery and Human Trafficking Policy requires all persons working for, with or on behalf of Noumi in any capacity, to:

- Be aware of modern slavery risks,
- Commit to acting ethically and with integrity in all aspects of business,
- Avoid any activity that might lead to or suggest a breach of Noumi's Modern Slavery and Human Trafficking policy, and
- Report concerns about any issue or suspicion of modern slavery, which can be done anonymously via Noumi's whistleblower program.

A breach of the policy may result in disciplinary action, which could result in dismissal. In addition, Noumi may terminate its relationship with individuals and/or organisations that breach the Modern Slavery and Human Trafficking Policy.

All new and existing Noumi staff (including staff members located overseas) are expected to complete mandatory training, on an annual basis, to ensure ongoing compliance with the requirements of Noumi's Modern Slavery and Human Trafficking Policy.

# Criteria 4 - Actions taken to assess and address modern slavery risks (continued)

## 2024 - MODERN SLAVERY QUESTIONNAIRE

In 2024, to increase visibility over its suppliers' supply chain, Noumi issued a supplier questionnaire to its key suppliers (approximately 40) , asking the following questions:

1. *Is the supplier required to report under the Act?*
2. *Does the supplier have a policy (or policies) in place to deal with modern slavery?*
3. *Is the supplier willing to provide Noumi with a copy of their policy (or policy) that is in place to deal with modern slavery?*
4. *How does the supplier monitor compliance with policies?*
5. *Does the supplier provide training to workers on how to identify, assess and respond to modern slavery risk?*
6. *A description of the abovenamed training?*
7. *Does the supplier have a person or team responsible for overseeing modern slavery risks? (including record keeping regarding contractors and subcontractors) that arise in relation to the good)*
8. *Does the supplier perform screening of all prospective suppliers to assess the risks of modern slavery or other human rights harms that may occur in its operations and supply chains?*
9. *How much visibility does the supplier have over its supply chain?*
10. *Is the supplier aware of low-skilled migrant workers working in its supply chains?*
11. *How would the supplier respond to any allegation of modern slavery or substandard working conditions in its operations or supply chains?*
12. *Does the supplier engage in any other due diligence activities to identify, prevent and mitigate risks specific to modern slavery in its operations and supply chains?*

The purpose of the questionnaire was to support the identification of modern slavery risks and foster collaborative efforts between Noumi and its suppliers to address these risks.

### Of the suppliers surveyed:

- Approximately 37% are required to report under the Act.
- 50% have a policy or policies in place to deal with modern slavery.
- 82% have high visibility over their supply chain, including a fully mapped supply chain and identification of key suppliers at all levels of the supply chain.
- 98% of suppliers are not aware of low skilled migrant workers working in its supply chain.

# Criteria 5 - Assessing the effectiveness of such actions

## No reports of modern slavery

Employees, suppliers, contractors and external stakeholders may communicate any concerns to Noumi's whistleblower platform, Whispli (available 24 hours a day, seven days a week in multiple languages). The Whispli platform provides an effective and risk-free way to report suspected violations of Noumi's values, policies, and/or applicable laws. Modern slavery is reportable via Whispli. During the Reporting Period no reports of modern slavery have been made to the Hotline in relation to the Reporting Entities' operations.

## SMETA audit results

In 2024, SMETA conducted an independent on-site audit of Noumi's Ingleburn manufacturing site and determined there were **no adverse findings** in the following areas:

- Usage of child labour,
- Payment of living wages,
- Harsh or inhumane treatment,
- Entitlement to work and immigration, and
- Freely chosen employment.

Such results confirm the continued awareness of modern slavery risks across all levels of the organisation.

## Questionnaire results

Noumi's Modern Slavery Questionnaire produced a positive response rate, indicating our suppliers are willing to consult with and share further details regarding their own actions to assess and address modern slavery risks within their respective supply chains. Noumi is pleased to have implemented this commitment, as reported in Noumi's Modern Slavery Statement for the previous reporting period.

As result of the Modern Slavery Questionnaire, Noumi has increased visibility on how its supply partners are managing their ESG responsibilities as well as bolstering Noumi's data and insight collection on modern slavery risk. The data will inform future goals and actions in terms of the identification of circumstances which may require further monitoring, auditing and/or verification.



# Future actions

Noumi is committed to identifying, assessing and addressing Modern Slavery risks in its supply chain. To that end, Noumi will strengthen its modern slavery identification and assessment processes. To address such areas, Noumi has and will take the following actions in FY 25:

## INCREASING SUPPLIER ENGAGEMENT

Noumi intends to increase the response rate to its modern slavery questionnaire by:

- Issuing the questionnaire at regular intervals to capture further responses;
- Requesting the questionnaire as part of the supplier onboarding process; and
- Proactively engaging with suppliers where non-conformities are detected.

## EXPANDING ON-SITE INSPECTIONS OF OVERSEAS SUPPLIERS

Introducing on-site visual inspections to be completed by senior executives to ensure there are no indications of modern slavery in overseas locations where Noumi has or may have commercial operations. Such inspections will be conducted with guidance from Anti-Slavery International's "Spot the signs of slavery".

## PROCUREMENT POLICY

Noumi is in the process of implementing a procurement framework to streamline the procedure of acquiring goods and services. This framework will include a defined process to help transparency in the procurement process. It is envisaged that social considerations (including modern slavery risk) are incorporated into this framework.

## Criteria 6 - Process of consultation

Noumi's Quality, Operations and Legal Team are responsible for collaborating for the purposes of developing the Statement. Throughout FY24, Noumi's supply chain risk assessment included;

- Collectively identifying potential issues that are unique to Noumi; and
- Creation of a modern slavery working group, which included stakeholders from Noumi's Legal, Risk, Quality and People and Culture teams.

To finalise the Statement, collaborative efforts between key stakeholders included email communications and discussions between each related entity owned or controlled by Noumi Limited.

The Statement was then presented to the Board of Noumi Limited (Board) for review and approval.

In undertaking the above steps, Noumi considers there has been appropriate consultation in preparing the Statement.

## Criteria 7 - Approval

This Statement meets the requirements of the Act and has been prepared in accordance with the Act and Guidance. Noumi Limited is a 'higher entity' within the meaning of section 14(2)(d)(ii) of the *Modern Slavery Act 2018* (Cth), being the entity in a position to influence or control each other reporting entity covered by this Statement (refer to Appendix 1).

**This Statement was approved by the Board of Directors of Noumi Limited on 18 December 2024**



**Genevieve Gregor**  
Chair & Non-Executive Director

# APPENDIX 1 : Entities covered by this Statement

- **Noumi Trading Pty Ltd** ABN 36 614 863 286
- **Noumi Operations Pty Ltd** ABN 99 089 982 392
- **Noumi IP Pty Ltd** ABN 78 109 854 373
- **Noumi Ingleburn Pty Ltd** ABN 79 600 569 382
- **Noumi Plant IP Pty Ltd** ABN 32 653 317 581
- **Noumi Dairy Trading Pty Ltd** ABN 54 653 316 422
- **Noumi Nutritionals Pty Ltd** ABN 62 618 227 759
- **Noumi Nutritionals IP Pty Ltd** ABN 54 653 317 232
- **Pactum Dairy Group Pty Ltd** ABN 67 158 174 442

