



20
24

Modern Slavery Statement

**RETAIL
FOOD
GROUP**

Introduction

This Modern Slavery Statement has been prepared by Retail Food Group Limited ACN 106 840 082 (RFG) and its subsidiaries (together, the Group) in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*

RFG is a global food and beverage company headquartered in Queensland. It is Australia's largest multi-brand retail food franchise manager and the owner of iconic brands including Gloria Jean's, Donut King, Brumby's Bakery, Beefy's Pies and Crust Gourmet Pizza. RFG is also a roaster and supplier of high-quality coffee products.

This statement identifies the steps taken by the Group during the financial year ending 28 June 2024 (FY24) to address modern slavery risks within its operations and supply chain. Where relevant, information concerning steps taken since 28 June 2024 is also provided.

Each Group member maintains its registered office at Level 11, 2 Corporate Court, Bundall Qld 4217, and its principal place of business at Level 4, 35 Robina Town Centre Drive, Robina Qld 4226.

Further information concerning RFG may be found on our website at www.rfg.com.au.

FY24 represented an important turning point during which RFG transitioned to a firm focus on delivering solutions to unlock growth and drive enhanced profitability for its Franchise Partners and shareholders.

Central to that platform is the conviction that the longevity of our business relies on the sustainability and responsiveness of our brands and business to the needs of our stakeholders. This includes recognition of the important role all businesses can play in influencing change within the environments and communities in which they operate.

In FY23 we established an Environmental, Social and Governance (ESG) framework to provide a clear 'north star' to guide the development of sustainability initiatives within our business. During FY24 that framework was endorsed and refined at a brand system level.

While our commitment to 'inspiring towards a healthy and prosperous planet and people' remains unchanged, we maintain an evolving approach to ESG matters as we engage with diverse stakeholders and continuously evaluate our impact and opportunities. Our ESG framework affords us flexibility to meet the evolving needs of our business, stakeholders, people and planet.

Our ESG framework is underpinned by five key pillars, the second and third of which are particularly relevant to this statement:



Environmental protection and resource conservation



Responsible sourcing and care for our environment



Excellence in well-being across our people



Healthier customers, healthier communities



Ensuring a prosperous RFG

We are aware of the potential impact our sourcing decisions may have on people and planet both within the markets we operate in, and amongst international supply chains, particularly coffee which is a key element of our business. Additionally, we understand our responsibility to care for our employees, Franchise Partners and their people.

By extension, we support every individual's right to live and work freely and oppose all forms of modern slavery. We also acknowledge the role we can play in positively contributing to the reduction and ultimate elimination of modern slavery practices. This acknowledgment is incorporated within our broader governance framework via our Policy Regarding Modern Slavery Practices.

Our Structure, Operations & Supply Chain

RFG is listed on the Australian Securities Exchange (ASX) and is headquartered in Queensland. We are Australia's largest multi-brand retail food and beverage franchise owner with a portfolio of brands, including:



We are also a roaster and supplier of high-quality coffee products.

As at 28 June 2024:

Our portfolio included

5

CORE BRANDS

Which were represented in

31

COUNTRIES

Our global network comprised

c. 1350

GLOBAL TRADING OUTLETS

In Australia, our network generated

>\$500m

DOMESTIC NETWORK SALES

and included estimated employees of

7,000

WE DIRECTLY
EMPLOYED 950
TEAM MEMBERS
AS AT 28 JUNE
2024

GLORIA JEAN'S
OPERATES IN
31 COUNTRIES
USING THE RFG
RECIPE
FOR SUCCESS

**RETAIL
FOOD
GROUP**

Our Domestic Operations

We own and operate household brands:



204
TRADING
OUTLETS



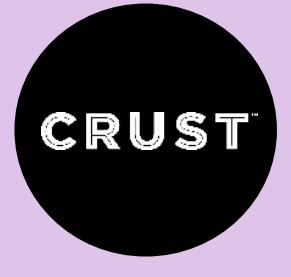
136
TRADING
OUTLETS



78
TRADING
OUTLETS



10
TRADING
OUTLETS



133
TRADING
OUTLETS

Trading Outlet totals current as at 28 June 2024

**RETAIL
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Our Domestic Operations (Continued)

While the total number of corporate outlets directly operated by us grew to 63 by the end of FY24, the vast majority of our domestic outlets are owned and operated by independent Franchise Partners who are responsible for the day-to-day operation of their business.

We maintain a national support office in Robina, Qld, and regional offices located in Brisbane and Maroochydore, Qld, and Chicago, USA. Our coffee roasting facility is situated in Castle Hill, NSW, we manufacture Beefy's products in Maroochydore, Qld, and also have a dedicated training facility in Mermaid Beach, Qld.

At the end of FY24 we had:

232

SUPPORT OFFICE,
FIELD TEAM &
PLANT MEMBERS

708

RETAIL TEAM
MEMBERS

10

INTERNATIONAL
TEAM MEMBERS

**RETAIL
FOOD
GROUP**

We roast and supply coffee and ancillary products to our franchise network and, during FY24, also roasted and supplied quality coffee and allied products to independent foodservice and QSR channels.



Our coffee roasting plant situated in Castle Hill, NSW



Our Beefy's Factory is situated in Maroochydore, Qld

Our supply chain currently spans c.750 supply partners. Of these, the core suppliers to our network are within the food and beverages sector or provide distribution services, packaging goods, professional services or, in the case of our wholesale coffee operations, provide green coffee beans and related products.

We co-ordinate the core supply chain for our domestic franchise network, sourcing and specifying key products and ingredients which we approve for use or sale within franchised businesses or corporate stores.

This is to ensure the quality and consistency of our core products and suppliers throughout each of our brand networks.

The supply of more generic products to our franchise network is not coordinated through us (noting also that our franchise agreements provide Franchise Partners scope to seek approval of alternative products and suppliers). These indirect supply arrangements are between our Franchise Partners and their own suppliers, or via our nominated distributors, and consequently, we do not have complete visibility in relation to these arrangements.

Our International Operations

Our brands are represented in more than 30 countries. In the USA, we operate as franchisor (via a subsidiary), and franchised outlets are owned and operated by Franchise Partners consistent with our domestic network.

The remainder of our international network is operated by Master Franchise Partners who have been granted the right or licence to establish and operate retail outlets, or to grant subfranchisees the right to do so, which are identified with our brands.

We have a small team that supports our USA network from our Chicago support office, but don't maintain a physical presence across the remainder of our international network.

We supply, or arrange for the supply, of certain key products (principally coffee and ancillary products) to our international network. Our Master Franchise Partners are responsible for:

- Either personally, or through their sub-franchisees, the day-to-day operation of outlets within their licensed territory;

- Establishing and maintaining the supply chain servicing their licensed territory; and
- Appointing reputable customs agents, freight forwarders, distributors, suppliers and other service providers necessary to maintain that supply chain.

Whilst our Master Franchise Partners and their sub-franchisees do not form part of the legal entities which comprise the Group, we acknowledge the potential for there to be risks linked to modern slavery within their operations or through their supply chains (to the extent we do not manage them).

In recognition of this risk, in 2021 we updated our Master Franchise Agreements to require our Master Franchise Partners to respectively address modern slavery risks, including a commitment to comply with our Policy Regarding Modern Slavery Practices.



Modern Slavery Risks in Our Operations & Supply Chain

We work with some of Australia's most recognizable manufacturing brands and partner with suppliers that are leaders in their own spaces, selected for their innovative approach to retail and product design, food safety, risk management and ethical business relationship management.

We've reviewed our operations and supply chain, and the products, services and activities of our suppliers and how these may potentially contribute to modern slavery practices, to identify possible modern slavery risks.

We consider these risks are more likely to be more pronounced in some aspects of our supply chain and operations given the geographic location of some suppliers, the relevant products, or the original upstream source of ingredients or materials supplied to us (or our Franchise Partners or Master Franchise Partners).

We recognize that supply chains within the food, beverages, apparel and paper products sectors may generally have inherently higher risks of modern slavery due to the nature of the work necessary in the production, processing, packaging and transport of these products.

This is particularly the case where labour is generated overseas and or via seasonal, low-skilled labour. We also recognize it may be difficult to detect the existence of modern slavery practices, particularly in connection with products or services outside of our core product or service requirements.

The sourcing of green coffee beans by our coffee business from upstream sources that originate in countries such as Brazil, Colombia, Kenya and Nicaragua, has been identified as carrying heightened risk of modern slavery practices given their geographic location and socio-economic factors, which may facilitate or incentivize those practices.

Our food, beverage and packaging suppliers represent the largest category of supplier 'spend' within our franchise network. The indirect supply chain from which these items originate includes the farms or plantations on which raw materials are grown, the factories which process these materials, and the transportation services involved in the supply chain.

While our supply chain sources from a range of locations, the majority of 'spend' is sourced from Australian based suppliers or distributors. We recognize that our supply partners source goods from overseas.

While our understanding of the potential risk of modern slavery practices within our core supply chain has improved, we acknowledge that, at this stage, our visibility across the entirety of our supply chain (including our non-core or indirect supply chain) can be enhanced in future reporting periods.



Our Supply Chain

Relevant categories of products or services incorporated within our supply chain include:

Key Product Categories

Food and beverage products (including ingredients)
Packaging and related products
Distribution services
Uniform providers
Equipment and shopfit services

Other Service/Product Categories

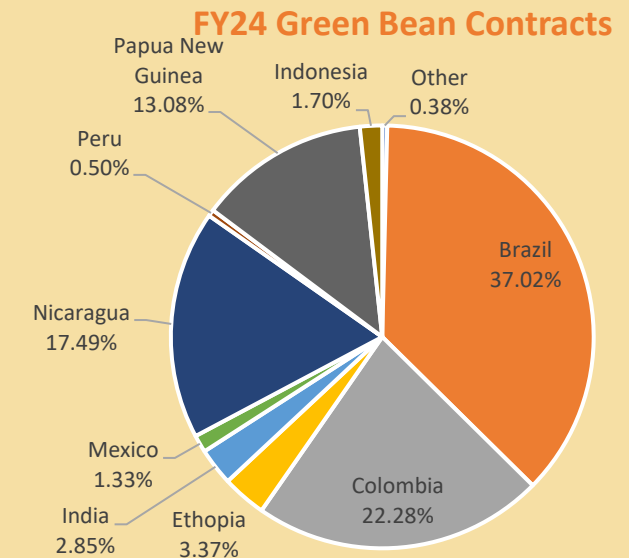
Suppliers of retail and commercial premises
Project management services
Marketing related services
Information and technology related services
Professional advisory services

Our own operations and support office activities, which are predominantly conducted by staff directly employed by us, represent the areas with the lowest risk of exposure to modern slavery practices.

We've previously undertaken a high-level assessment of our key suppliers (representing the overwhelming majority of 'spend' in our network) which included a targeted self-assessment questionnaire regarding modern slavery risk in their business and supply chain. We subsequently procured membership of SEDEX, one of the world's largest online platforms for the collection and sharing of ethical supply chain information, to help us further inform modern slavery risk within our network.

We consider that coffee represents the largest risk for modern slavery practices to exist within our supply chain. Our operations incorporate the importation and transportation of green and roasted coffee and related products such as teas, syrups, brewing equipment and tools, and this relies upon a supply chain which includes direct suppliers, together with indirect suppliers such as foreign plantations where coffee and tea are produced or processed, and the factories where equipment is manufactured.

The regions from which green coffee beans are sourced fluctuates between reporting periods dependent upon our stockholdings, the availability of beans and relevant pricing considerations. The graph below details green coffee bean origins used in our business during FY24:



Green Coffee Beans



Having regard to the graph on the preceding page, and informed by information derived from both the SEDEX platform and our Rainforest Alliance certification program, we have assessed modern slavery risks exist in connection with green coffee beans sourced from the following international regions

BRAZIL
COLOMBIA
COSTA RICA
ETHIOPIA
HONDURAS
INDIA
INDONESIA
KENYA
MEXICO
NICARAGUA
PERU
PNG
GUATEMALA
VIETNAM
RWANDA



**FY24 %
Share**

37.02%
22.28%
0.13%
3.37%
0.20%
2.85%
1.70%
0.01%
1.33%
17.49%
0.05%
13.08%
0.01%
0.02%
0.01%



**Forced
Labour**

High Risk
Medium Risk
Medium Risk
High Risk
Medium Risk
High Risk
Medium Risk
Medium Risk
Medium Risk
Medium Risk
Medium Risk
No Data
High Risk
Medium Risk
Medium Risk



**Child
Labour**

Medium Risk
Medium Risk
Medium Risk
High Risk
High Risk
Medium Risk
Medium Risk
Medium Risk
Medium Risk
Medium Risk
Medium Risk
No Data
High Risk
Medium Risk
Medium Risk

These risks have informed & driven our commitment to migrating our green coffee bean requirements to certified coffee

Actions Taken to Assess & Address Risk

As part of our broader approach to sustainability, we acknowledge the important role we can play in positively investing in and contributing to the responsible management, measurement and minimization of the environmental and social impact of our business and supply chain. We acknowledge that this role extends to positively contributing to the reduction and ultimate elimination of modern slavery practices.

While acknowledging more can be done, in prior periods we've augmented our governance and resourcing to better drive more sustainable outcomes and strategies for our supply chain and business. This has included:

- The establishment of our Sustainability Committee to oversee new systems and controls intended to build a more socially responsible business and supply chain; and
- The appointment of a Sustainability Manager to champion those systems and controls.

Our Committee has engaged with appropriate organizational representatives within the Group's broader business operations to frame a broad-based approach to identifying scope for change or new initiatives targeting improved sustainability within our business.

This included materiality assessments in connection with ESG matters to identify topics most important to our business and stakeholders, and to inform development of our ESG framework established in FY23. These assessments have identified opportunities for us to continue to enhance our approach to things such as:

- Training in connection with modern slavery risks;
- Supply partner assessment, selection and onboarding; and
- Driving more sustainable sourcing and improving green coffee bean traceability standards.

This work has informed various activities, including our procurement of SEDEX membership, the redesign of our approach to supplier engagement, and our approach to green coffee bean procurement.

In 2021 we also adopted our Policy on Modern Slavery Practices, which is available on our website. Our policy records our opposition to all forms of modern slavery and our commitment to reducing the risk of it occurring within our business and supply chain.

This policy forms part of a broader governance framework that includes our:

- Code of Conduct;
- Anti-Bribery & Corruption Policy;
- Whistleblower Policy;
- Diversity Policy;
- Workplace Bullying Policy;
- Grievance Policy; and
- Competition & Consumer Law Policy.



Supply Partner Relationships

We expect our supply partners to share our opposition to modern slavery. This expectation has underpinned initiatives which continue to be observed or enhanced within our business.

This includes the use of supply agreements which require compliance with applicable modern slavery laws, our Policy Regarding Modern Slavery Practices, and our Supply Partner Code of Conduct (Code).

Our Code sets out our expectations of suppliers so they can help us to source goods and services in a responsible, sustainable and fair way. Our Code covers topics including:

- Supply partner governance and risk management;
- Labour and human rights (including an expectation that our supply partners share our support for every individual's right to live and work freely and to strive to reduce or eliminate modern slavery risks within their own supply chains);
- Health and safety; and
- Environmental sustainability.

It also incorporates an expectation that our suppliers seek continuous improvement in their own businesses and strive to exceed the minimum requirements outlined in our Code.

New suppliers are assessed and qualified through a registration process which outlines our commitment to providing goods and services to our customers that are of the highest standards while representing great value.

Safety across food, non-food and service provision is of the highest importance, and we work hard to ensure all goods and services provided are fit for purpose, are handled in the correct manner and are compliant to relevant standards. We expect our suppliers to adhere to this same rigor when complying with standards and local legislation.

Our process defines a set of protocols and data collection as a minimum requirement to working together safely and ethically, requests suppliers to become SEDEX members, and to comply with the guiding principles of our relevant published policies to provide us with enhanced insight into potential supply chain risks.

Our requirements represent minimum expectations and are not intended to limit or alter any other requirements or specifications imposed by law or regulation.

We ask our suppliers to review our requirements and to enclose in their registration submission any requested and relevant documentation and an acknowledgement and acceptance of our policy documentation.

SEDEX provides ethical trade tools and services to improve responsible sourcing practices within supply chains. It provides risk assessments across the pillars of labour, health and safety, environment, and business ethics, has operated for c.20 years, and has approximately 85,000 members across 180 countries⁽¹⁾.

We have an ambition to continue to evolve our insight into supply chain risks via the SEDEX platform and to use it as a valuable resource to improve our approach to modern slavery risk.

(1) sourced via www.sedex.com



Green Coffee Beans

Given the environmental and social risks associated with the production of green coffee, we have evolved our approach to green coffee bean sourcing in recent years.

In FY20 we rationalized our green bean coffee suppliers to reputable third parties, and in FY21, refined our green coffee bean sourcing principles.

These actions informed a commitment to migrate our green coffee bean requirements to certified coffee, and in FY22, we purchased 75% of our domestic green coffee requirements as certified coffee.

That percentage was increased to 96.1% in FY23, assisted by an expansion of our partnership with Rainforest Alliance.

During the current reporting period (FY24) we maintained the trajectory of our green bean sourcing initiative, with over 97% of our FY24 domestic green bean requirements now satisfied by certified coffee, establishing us as one of Australia's largest buyers of certified coffee.



The Rainforest Alliance standard has four key themes which focus on the prevention of deforestation, improving farmer livelihoods, improving climate resilience, and advancing the human rights of rural communities. The Rainforest Alliance standard operates on an 'assess and address' basis, which requires certificate holders to establish internal committees responsible for assessing and mitigating human rights violations. The committee's role includes monitoring the farm or farming group for violations, and it has access to training to remediate issues if identified.

Previously we set a goal to transition the entirety of our global green coffee requirements to certified coffee by the end of FY24. Whilst we remain motivated to achieve this outcome, supply constraints and the increasing global demand for certified coffee have delayed progress and we have therefore modified our expectations. We are committed to continue working with our international roasting partners to range Rainforest Alliance certified coffee, and where this is not possible, we look to partner with reputable suppliers and certification bodies to help us maintain our standards.



Franchise & Master Franchise Partners

We utilize Franchise Agreements and Master Franchise Agreements that expressly require compliance with modern slavery laws, employment laws, and our Policy Regarding Modern Slavery Practices.

We've implemented measures for our domestic network to assist our Franchise Partners to comply with their obligations as employers. This includes the provision of education and resources, access to third party subject matter experts (membership of the National Retail Association) and a wage compliance audit framework that assesses Franchise Partner compliance with relevant Awards and employment law requirements.

Our framework incorporates a requirement that Franchise Partners complete a compliance questionnaire which, among other things, better informs us of the potential for modern slavery risks within their business. Audits are carried out regularly by our auditors, who have been given the necessary authority to inspect Franchise Partner employee records and engage with Franchise Partner team members.

More than 150 wage compliance audits were initiated during FY24, contributing to over 1,250 audits having been initiated since we established this process in FY17.



Assessing the Effectiveness of our Actions

The effectiveness of our response to modern slavery risks, and the initiatives implemented by us in response thereto has been assessed across:

- Our operations – with a focus on our team members
- Our supply chain – through our procurement team and coffee division personnel
- Our Franchise Partners – via the wage compliance framework referenced above

We remain committed to further developing our assessment processes and supply partner selection criteria, facilitated by our internal procurement teams, guided by our governance framework and leveraging connectivity through the SEDEX platform.

This ongoing evolution of connectivity and visibility drives improved visibility of modern slavery risk within our operations and supply chain, the identification of circumstances which may require more rigorous monitoring, and ongoing activity to audit and verify information.



Our Operations, Supply Chain & Franchise Partners

Our Operations:

All new team members are required to expressly acknowledge our Policy Regarding Modern Slavery Practices (amongst other policies forming part of our broader governance framework) prior to commencing employment with the Group. Our policy forms part of our online intranet platform and is a key part of our essential employee policy framework.

As part of the support structure provided to our team, all team members are offered and have available to them various programs, including our Employee Assistance Program, health and wellbeing programs, education assistance and corporate learning and development programs, flexible working hours and salary packaging, and access to the whistleblower protections afforded in our Whistleblower Policy.

Our Supply Chain:

We continue to utilize supply agreement templates (updated in 2021) which require suppliers to comply with our Policy Regarding Modern Slavery Practices and Supply Partner Code of Conduct, in addition to modern slavery laws.

During prior reporting periods we identified that key suppliers to our network (in terms of 'spend') fell within the food, beverage and packaging sectors, provide distribution services or are green bean coffee suppliers. We sought further insight into those supply partners' response to modern slavery risks via targeted questionnaires, and then supplemented that information via the insights afforded by our SEDEX membership.

While we have made headway, we acknowledge that opportunity to enhance our approach to supply partner assessment, selection and onboarding, and by extension, our approach to modern slavery risks within our supply change, remains.

Our Franchise & Master Franchise Partners:

The Franchise Agreements and Master Franchise Agreements we issue incorporate express provision on account of modern slavery risks and a requirement to comply with our Policy Regarding Modern Slavery Practices.

The wage compliance monitoring framework we established in relation to our domestic network in FY17 is also driving positive outcomes. Since inception of our framework, we have initiated over 1,250 outlet wage audits, with more than \$800,000 in lost wages being returned to team members during this time.



Consultation & Conclusion


In preparing this statement, we have engaged with our:

- Procurement and coffee supply chain managers
- Our broader coffee business personnel
- Our human resource and internal legal departments
- Various other senior managers within the Group

We reiterate our support for every individual's right to live and work freely, are opposed to all forms of modern slavery, and remain committed to reducing the risk of modern slavery occurring within our operations and supply chain.

We are motivated to further enhance our governance and response in connection with modern slavery risks and to improving the processes, procedures and controls we maintain in relation thereto.

This statement has been approved by the Board of Directors of Retail Food Group Limited



Peter George
Chairman of the Board
Retail Food Group Limited
December 2024

Important Note Regarding Forward Looking Statements:

This statement contains forward-looking statements, including statements of current intention, of opinion, and predictions as to possible future events and prospects. Forward-looking statements include those containing words such as 'anticipate', 'believe', 'expect', 'project', 'forecast', 'estimate', 'likely', 'intend', 'should', 'could', 'may', 'target', 'plan', 'consider', 'foresee', 'aim', 'will' and other similar expressions. Such statements are not statements of fact, and there can be no certainty of outcome in relation to the matters to which the statements relate. Forward-looking statements involve known and unknown risks, uncertainties, assumptions and other important factors that could cause actual outcomes to be materially different from the events or results expressed or implied by such statements, and outcomes are not all within the control of RFG. Statements about past performance or activities are not necessarily indicative of future performance. Neither RFG nor any of its subsidiaries, affiliates and associated companies, or any of its or their respective officers, employees or agents (Relevant Persons), makes any representation, assurance or guarantee as to the accuracy or likelihood of fulfillment of any forward-looking statement or any outcomes expressed or implied in any forward-looking statement. The forward-looking statements in this statement reflect views held only as at the date hereof, and except as required by law, the Relevant Persons disclaim any obligation or undertaking to publicly update any forward-looking statements, or discussion of future or other prospects, whether because of new information or future events.

Appendix

The following details identify the mandatory reporting criteria outlined in section 16 of the *Modern Slavery Act 2018* and provides page references to where corresponding disclosures have been made in this statement.

Mandatory Reporting Criteria

(a) Identify the reporting entity	Page 1
(b) Describe the structure, operations & supply chains of the reporting entity	Pages 2 - 5
(c) Describe the risks of modern slavery practices in the operations & supply chains of the reporting entity and any entities that the reporting entity owns or controls	Pages 6 - 8
(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence & remediation procedures	Pages 9 - 12
(e) Describe how the reporting entity assesses the effectiveness of such actions	Pages 13 - 14
(f) Describe the process of consultation with any entities that the reporting entity owns or controls	Page 15
(g) Include any other information that the reporting entity considers relevant	Page 15

