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LANGDON

A WORLD OF TASTE



H.J. Langdon & Co Pty Ltd
Modern Slavery Annual Statement
2022-2023

hjangdon.com

Australia | New Zealand | United Kingdom | Ireland | Singapore | Thailand

MODERN SLAVERY REPORT



Speak Up with Confidence – Speak Up Langdon

In our commitment to fostering an open and transparent workplace, we encourage you to raise any concerns that may affect our adherence to company values. To report a concern:

Email: speakup@hjangdon.com

Phone: Leave a confidential message at (+61) 3 8360 1987

Post: Attention 'Whistleblower Protection Officer,' 525 Mt Derrimut Rd Derrimut 3026, Australia

All reports are treated with utmost confidentiality, unless express permission for disclosure is granted by the reporter. Your voice matters; help us uphold our commitment to a safe and ethical workplace.



Celebrating 170 Years

As a fifth-generation family-owned enterprise, we were thrilled to commemorate our 170th anniversary. Throughout our rich history, we've fostered a global community, uniting premium ingredients and product trends with creative minds and innovators worldwide. Embracing both tradition and continuous innovation, we feel privileged to hold a significant role in the dynamic food industry.

Our 170-year legacy has endowed us with unparalleled experience, a heritage we carry forward. Leveraging our history and knowledge, we aim to make a meaningful impact on our customers, our planet, and our people. Looking ahead, we are committed to implementing initiatives and practices that uphold ethical and sustainable standards throughout the entire supply chain, from source to plate, on a global scale. With each generation, our responsibility for ethical sourcing evolves, and we take pride in collaborating with the industry to fortify our supply chain against modern slavery.

MODERN SLAVERY REPORT



This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 Australia. This report was prepared for fiscal year 2022-2023. This is H. J. Langdon & Co Pty Ltd's fourth statement.

The purpose of this statement is to fulfill reporting obligations under the Australian Act, demonstrating our comprehension of the risks associated with Modern Slavery within both our organization and the extended supply chain, as well as outlining the measures implemented to mitigate these risks.

This statement has received approval from the Board of H.J. Langdon & Co Pty Ltd, referred to herein as the "Company." We acknowledge that our corporate and social responsibilities extend beyond our internal operations to encompass our supply chain. Thus, we consistently strive to ensure that the ingredients and services we procure adhere to ethical production standards. Our approach involves collaborating with suppliers to positively influence our social, ethical, and environmental performance.

To assess supplier adherence to these standards, we utilize tools such as the Langdon Supplier Code of Conduct, Modern Slavery & Vendor Risk Review, and the Supplier Ethical Data Exchange (SEDEX) program. These platforms serve as effective means for evaluating suppliers' social and environmental practices.

ABOUT H.J LANGDON & CO PTY LTD



H.J. Langdon & Co Pty Ltd, a fifth-generation family-owned enterprise, was founded in Melbourne, Australia, in 1852. Renowned as one of the leading distributors and importers in the region, we specialise in a diverse array of food ingredients sourced from Europe, Africa, the U.S.A, South America, and Asia. Our expanding blending and packing facility cater to intermediate and finished food blends, serving both food manufacturers and retail-ready products.

The Company is a subsidiary of Langdon Group Limited which operates in New Zealand, the U.K, Ireland, Thailand, and Singapore. The Company employs approximately 150 employees in Australia. Our workforce spans various departments overseeing supply chain activities, including procurement, finance, transport, warehouse, production, regulatory affairs, and quality assurance.

Our supply chain encompasses a mix of food ingredient manufacturers and traders, focusing on key product categories such as herbs, spices, functional ingredients, flavours, colours, sweeteners, frozen goods, fruits, vegetables, dried fruits, nuts, seeds, ancient grains, beans, pulses, dehydrated vegetable ingredients, botanicals, teas, and organics.

The end products traded or blended by the Company undergo a complex journey within our supply chain. Originating from agricultural growing, harvesting, and primary processing, they undergo refinement to achieve specific conditions. Some items are synthetically produced, plated, or blended to meet precise specifications. The global procurement process involves navigating an intricate web of processors, sellers, and re-sellers, with contributions to the final product coming from numerous suppliers and geographical locations.



POTENTIAL RISKS OF MODERN SLAVERY



The Company has a strong reputation in supplying high quality, ethically sourced ingredients supported by global certifications. We understand key risk indicators for modern slavery to be;

- Countries marked by conflict
- Countries with state imposed force labour
- Countries with higher migrant populations or base skilled workers
- Operations that rely on third party labour sources
- Complex supply chain across several high-risk geographic areas (raw material supply)

The Company acknowledges that the primary exposure to the risk of modern slavery lies within its ingredient supply chain. The food supply chain, characterized by its complexity and global reach, poses varying levels of risk for different commodity items. This risk may be attributed to factors such as the lack of visibility in the supply chain or the geographic origin of the items.

Breaking down the food supply chain into four main tiers—Direct Suppliers, Secondary Suppliers, Primary Processors and Manufacturers, and Raw Materials—reveals additional intricacies. Within each tier, there is further complexity due to the involvement of numerous farms, primary processes, distributors, and the passage of products and components before reaching the end customer.



Tier 1
Direct Suppliers

Manufacturers
Distributors
Traders



Tier 2
Secondary Suppliers

Blending and Packing Facility (intermediate and Finished Blends)

Secondary Processing plants (e.g. refining, processing)



Tier 3
Primary Processing and Manufacturers

Manufacturing (intermediate & Finished)

Sorting, cleaning, grading



Tier 4
Raw Materials

Agricultural growers
Harvesting Operations

Primary processing (Sorting, cleaning, grading)

POTENTIAL RISKS OF MODERN SLAVERY



The challenges associated with the food and demand dynamics include cost considerations, with labour being sometimes a significant expense at each stage of the process. It's important to note that human labour is an integral part of most steps. Furthermore, the food and beverage sector often rely on low-skilled workers who are frequently employed on a short-term or seasonal basis.

Based on our Modern Slavery risk analysis the Company recognises some ingredients are sourced from regions of higher vulnerability to Modern Slavery. Using the Walk Free Global Slavery Index 2023, the Company recognises the following countries of concern within our supply chain. (Criteria: Vulnerability >50 or Prevalence >10).

Countries High risk: Pakistan and Turkey

Med risk: Cambodia, Egypt, Guatemala, India, Iran, Mexico, Philippines, Sri Lanka, South Africa, UAE, Ukraine.



OUR ACTIONS



The Company is unwavering in its commitment to socially and ethically responsible conduct across all administration, procurement, sales, and production sites, vehemently opposing Modern Slavery in any manifestation. To uphold the principles of the Modern Slavery Act 2018, we have implemented the following measures:

Environmental & Socially Responsible Framework (ESR): Our goal-oriented ESR framework is pivotal in shaping our cultural emphasis on social matters.

Policy and Procedure Revision: Our governing policies and procedures have undergone careful revision to incorporate Modern Slavery legislation. Employees receive refresher training on the following:

- PR33-015 Modern Slavery
- POL33-013 Langdon Code of Conduct
- POL33-39 Langdon SUPPLIER Code of Conduct
- POL33-038 Whistleblower Policy
- PR33-004 Staff Grievance Handling Procedure
- PR33-013 Labour and Wages management

Modern Slavery Risk Assessment: Our Vendor Approval process for both new and existing suppliers integrates a robust Modern Slavery risk assessment.

SEDEX Membership and Antislavery Principles Commitment: Langdon Suppliers are encouraged to become SEDEX members or, alternatively, complete our Antislavery Principles Commitment Form and Modern Slavery Questionnaire.

SMETA 4 Pillars Standards: As a SEDEX member, our adherence to the SMETA 4 Pillars standards has been verified through audits.

Global Modern Slavery Awareness Training: We have extended our Modern Slavery Awareness training to Procurement and Technical team members, encompassing Australia, New Zealand, and the UK.

Ongoing Supply Chain Monitoring: Our commitment extends to the continuous monitoring of the supply chain in relation to conflict, climate change, economic, and sustainable challenges.

Labour Hire Compliance Audits: Rigorous audits are conducted to ensure compliance with Labour Hire standards.

OUR ACTIONS



Whistleblower Program Effectiveness Review: We conduct an annual review to gauge the effectiveness of our Whistleblower program.

Supplier Remediation: Suppliers identified with compliance and/or conduct concerns are promptly engaged in a remediation process, guiding them toward improved practices.

These actions underscore our dedication to eradicating Modern Slavery and fostering a responsible, ethical, and sustainable business environment.

Evaluating the impact of our initiatives

The foundation of Langdon's Modern Slavery mitigation efforts lies in our ESR Framework and Vendor Management system. We are committed to assessing the effectiveness of our actions through the following measures:

SMETA and Customer Compliance Audits: Rigorous social responsibility audits, including SMETA audits and customer compliance assessments, serve as benchmarks for gauging the impact of our initiatives.

Responsible Sourcing and Rain Forest Alliance Compliance: Membership in and adherence to Responsible Sourcing Palm Oil and Rain Forest Alliance principles are integral components of our evaluation strategy.

Internal Policy and Procedure Audits: Regular audits of our internal policies and procedures ensure alignment with our commitment to combating Modern Slavery.

Annual Modern Slavery Review: An annual review dedicated to assessing our efforts in addressing Modern Slavery provides valuable insights into our progress and areas for improvement.

Monitoring Supply Chain Risks: Vigilant monitoring of reports concerning modern slavery risks, breaches, or emerging concerns within our supply chain enables us to proactively address potential challenges.

Effectiveness of Remediation Process: The success of our remediation process, aimed at guiding suppliers toward improved practices, is a critical metric in evaluating the overall impact of our initiatives.

These evaluation mechanisms underscore our dedication to continually enhance the effectiveness of our actions in the pursuit of eradicating Modern Slavery from our operations and supply chain.

CONSULTATIONS & NEXT STEPS



H.J. Langdon & Co Pty Ltd is a collaborative organisation. Further development and continuous improvement of our ESR framework including modern slavery is managed through consultation with all key stake holders within our business and in our supply chain.

Over the next reporting period, we will;

- Develop a plan to leverage supplier data from all entities within Langdon Group.
- Identify a digital platform to support the risk assessment.
- Identify methodology to expand risk assessments to tier 2 suppliers.
- Continue our Labour Hire compliance audits.
- Continue to raise awareness of Modern Slavery throughout the organisation.
- Continue to deliver on our ESR annual Goals.

Approval

This statement was approved by the Board of H.J. Langdon & Co Pty Ltd and signed by a responsible member of H.J. Langdon & Co Pty Ltd on 21/12/23

A handwritten signature in black ink, appearing to read 'Chris Langdon', positioned above the printed name.

Chris Langdon
Director & CEO of H.J. Langdon & Co Pty Ltd