

Modern Slavery Statement

for the financial year ended 30 June 2023

INTRODUCTION

This is the third Modern Slavery Statement for the period 1 July 2022 to 30 June 2023 (“**Statement**”) of Noumi Limited ABN 41 002 814 235 (“**Noumi**”). The term “Noumi” as used in this Statement refers collectively to Noumi and its wholly owned subsidiaries.

Teams within Noumi work together to identify, mitigate and prevent risks, including human traffic risks across its supply chain and operations. Noumi recognises that modern slavery is a complex problem and can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and related forms of workplace abuse.

Noumi is committed to maintaining and continuously improving systems and processes to help identify and address risks of human rights violations that may exist in its business operations and supply chains throughout the world. Although the risk of modern slavery within Noumi’s supply chain is low, Noumi is alert to inherent risks that may exist in its wider supply chain, given Noumi’s commercial operations extend globally.

This Statement meets the requirements of sections 13 and 16 of the *Modern Slavery Act 2018* (Cth) (“**The Act**”) and has been prepared in accordance with the Act and the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (“**Guidance**”).

REPORTING CRITERIA 1 – IDENTIFY OF REPORTING ENTITY

The reporting entity covered by this Statement is Noumi Limited ABN 41 002 814 235, a company incorporated under the laws of Australia with its registered office at 8A Williamson Road, Ingleburn NSW 2565. Noumi has 530 employees as at 30 June 2023.

REPORTING CRITERIA 2 – STRUCTURE, OPERATIONS AND SUPPLY CHAIN

STRUCTURE

Noumi is listed on the Australian Stock Exchange (ASX:NOU) and reported an annual revenue in FY23 that exceeds the Act’s minimum mandatory reporting threshold of \$100 million.

OPERATIONS

Noumi is a global Australian-based company producing a diverse range of dairy and plant-based milks, as well as nutritional protein ingredients and sports supplements. In addition, Noumi has:

- Two (2) manufacturing sites in Australia located in Ingleburn NSW and Shepparton VIC,
- Offices in three (3) countries (Australia, Singapore, and China); and
- Over 150 products sold into 24 countries.



Figure 1 – visual representation of locations Noumi’s commercial operations extend to.

SUPPLY CHAIN

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. The main part of Noumi’s business however, consists of manufacturing plant based and dairy beverages, which rely heavily on the sourcing of raw materials and ingredients. The vast majority of Noumi’s suppliers are Australian plant-based producers of raw ingredients including oats and macadamias (100% sourced from Australian farmers) and almonds (88% sourced from Australian farmers). Noumi further processes about 250 million litres of milk a year from a fully integrated supply chain with around 40 Australian dairy farmers.

In addition to the above, the local Australian supply chain includes the following key activities:

1. Logistics services, i.e warehousing and transportation of products;
2. Marketing and sales support, i.e advertising, promotions, merchandising, public relations,
3. Legal, Consulting and Insurance services,
4. IT infrastructure services; and
5. Recruitment services.

As identified in Reporting Criteria 3, Noumi considers its highest risk supply chain is its international distribution and operations supply chain, whereby Noumi may procure services and materials, including:

- Product distribution services,
- Paper and consumables for its manufacturing operations,
- General supplier services to assist in the management of its overseas operations, and
- Logistics and warehousing services,

in countries reported as being of “medium” or “higher” risk in the Global Slavery Index such as India, China, Thailand and the Philippines¹.

¹ “Global Slavery Index, Global Findings”, *Walk Free* (Web Page, 20 November 2023) <<https://www.walkfree.org/global-slavery-index/findings/global-findings/>>

REPORTING CRITERIA 3 – THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY AND ANY ENTITIES THAT THE REPORTING ENTITY OWNS OR CONTROLS

Noumi is cognisant of any modern slavery risks associated with its commercial activities both domestically and internationally. During the reporting period, Noumi identified the following risks of modern slavery practices in its operations and supply chain:

- The employment of migrant workers (directly or indirectly), who are, generally speaking, more than three times as likely to be subject to forced labour compared to non-migrant workers², and
- Engaging suppliers in regions where there are greater human rights and labour related risks, including forced or indentured labour, slavery or trafficking of persons.

Noumi undertakes a risk-based approach and prioritises enabling all employees (locally and internationally) to be aware of modern slavery risks, including the identification, assessment, and response to modern slavery risk indicators.

REPORTING CRITERIA 4 – ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

LABOUR RISKS – MIGRANT WORKERS

Noumi's recruitment policies and internal guidelines outline minimum requirements for ethical recruitment and ensures its recruitment process accords with the principles of Equal Employment Opportunity (EEO) recruitment to ensure the selection and appointment process is consistent, objective and transparent. This applies to both internal and external recruitment. Noumi's recruitment process includes protections for fundamental human rights and compliance with laws of the respective countries in which Noumi operates.

Nevertheless, Noumi still acknowledges the increased vulnerability of migrant workers and continues to take steps to uphold and maintain all work rights and ethical standards. This includes, requiring employees of Noumi to undertake training modules annually in respect to Noumi's Equal Opportunity & Diversity Policy ([Equal Opportunity and Diversity Policy \(noumi.com.au\)](https://noumi.com.au/equal-opportunity-and-diversity-policy)), and Whistleblower and Improper Conduct Policy and Procedure ([Whistleblower & Improper Conduct Policy & Procedure \(noumi.com.au\)](https://noumi.com.au/whistleblower-and-improper-conduct-policy-and-procedure)).

Employees of Noumi are empowered to report actual or perceived violations of Noumi's Code of Conduct ([Code of Conduct \(noumi.com.au\)](https://noumi.com.au/code-of-conduct)) and can do so anonymously through Noumi's online whistleblowing platform, WHISPLI.

HIGH RISK GEOGRAPHIES

Noumi expects all of its suppliers (domestic and international) to:

- (a) Comply with all applicable laws and Noumi's policies relating to modern slavery or human trafficking, including the Act, and

² Office of the High Commissioner for Human Rights (OHCHR) (2022) 'We wanted workers, but human beings came': Human rights and temporary labour migration programmes. Available at: <https://bangkok.ohchr.org/wp-content/uploads/2023/01/Report-on-temporary-labour-migrationprogramme-final-250123.pdf> (Last Accessed 1 November 2023).

- (b) Take reasonable steps to ensure that there is no modern slavery or human trafficking in any part of their business and or supply chains.

In addition to the above, when contracting with a supplier, Noumi's standard terms and conditions require both Noumi and the supplier to:

- (a) Confirm neither of its officers, employees or others associated with it, have been convicted or investigated for modern slavery or human traffic offences,
- (b) Promptly report to the other party of any actual or suspected slavery or human trafficking in a supply chain, and
- (c) Maintain records evidencing its compliance with all applicable laws relating to modern slavery or human trafficking, and
- (d) Grant the other party the right to audit it for the purposes of compliance with the above listed requirements.

The above obligations are embedded into Noumi's contractual agreements, including purchase orders between Noumi and direct suppliers.

Although only a small percentage of Noumi's suppliers are located outside of Australia, Noumi is alert to the fact that the risk of modern slavery is higher in certain jurisdictions where Noumi operates, including parts of South East Asia.

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

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

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.

SEDEX MEMBERSHIP AND SMETA AUDIT

Noumi is a member of Sedex, which stands for Supplier Ethical Data Exchange, being an online system which allows companies to maintain data on ethical and responsible practices, view certifications and allow for such information to be readily shared and exchanged with stakeholders.

As part of onboarding new suppliers, Noumi requests information on whether a supplier is a member of Sedex and where applicable, its unique linking code, to enable the exchange of supply chain information.

Noumi's two manufacturing sites (Ingleburn and Shepparton) are also audited under the SMETA Pillar 3 Standard, which is Sedex's auditing methodology to understand the working conditions in the supply chain.

REPORTING CRITERIA 5 – ASSESSING THE EFFECTIVENESS OF SUCH ACTIONS

In FY23, Noumi received satisfactory results from independent Sedex SMETA audits and was further, independently audited by one of its largest customers, against Sedex requirements, and received a pass result.

In addition, there is a high level of awareness amongst Noumi employees through training and by making relevant policies (including the Modern Slavery and Human Trafficking policy) readily accessible and searchable internally.

Where non-compliance is detected, Noumi will take action to rectify and address any potential modern slavery threats with suppliers by working collaboratively in accordance with Noumi's policies and standards.

REPORTING CRITERIA 6 – PROCESS OF CONSULTATION

Noumi's Quality, ESG and Legal Team are responsible for collaborating for the purposes of developing the Modern Slavery Statement. Throughout FY23, Noumi's supply chain risk assessment included; identifying overarching risks and emerging risks by monitoring industry standards, industry collaboration, supplier selection and evaluation and training and awareness.

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.

REPORTING CRITERIA 7 – OTHER INFORMATION AND APPROVAL OF STATEMENT

CORPORATE GOVERNANCE AND POLICIES

The Board has ultimate authority and oversight over Noumi and regards corporate governance as an important element in achieving Noumi's objectives. The Board has developed policies, codes and guidelines to help clarify Noumi's views and expectations on a range of issues, including appropriate conduct and reporting grievances. Noumi's corporate governance policies are publicly accessible and viewable here: [Corporate Governance | Noumi Limited](#)

ONGOING COMMITMENT AND CONTINUOUS IMPROVEMENT

Noumi will further continue to monitor supply chains and where applicable, update, internal policy and guidance to ensure that at each and every level, the requirements of the Act and global standards for Modern Slavery prevention are considered and met.

In FY24, Noumi intends to:

- Allocate additional resources aimed at conducting analysis of its existing supply chain in light of changing expectations of multinational corporations in dealing and addressing modern slavery risks, and
- Issue a modern slavery questionnaire at the time of contracting with suppliers assessed to be potentially at higher risk, to understand the unique systems and processes of potential suppliers when it comes to the identification and mitigation of modern slavery risks. Noumi considers this information will not only raise awareness and understanding about modern slavery, but will help guide and shape policy initiatives targeted at eradicating modern slavery risks globally.

In addition to the above, Noumi will continuously strive to promote mature ESG management through an independent and proactive organisational culture that steps beyond the concept of ESG as legislation, systems, and regulations.

APPROVAL

This Statement meets the requirements of the Act and has been prepared in accordance with the Act and the Modern Slavery Act 2018: Guidance for Reporting Entities (referred throughout this Statement as "Guidance").

This Statement was approved by the Board of Directors of Noumi on 19 December 2023.



Genevieve Gregor
Chair & Non-Executive Director