

Modern Slavery Statement

for the financial year ended 30 June 2022

This joint statement is made by Noumi Limited ABN 41 002 814 235 and its wholly owned subsidiaries (collectively, the **Group**) in accordance with s13 and s16 of the *Modern Slavery Act 2018* (Cth) (the **Act**) for the year ending 30 June 2022.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking.

The Group is committed to, and expects its contractors, customers, distributors, suppliers and other business partners to also be committed to:

- act ethically and with integrity in all aspects of business;
- implement effective systems and controls to ensure modern slavery in any part of their supply chains is not tolerated; and
- provide transparency in reporting obligations under the *Modern Slavery Act 2018* (Cth) (the **Act**).

The Group is committed to assessing, monitoring, and mitigating the risks of modern slavery and broader human rights risks across its supply chains in line with the Group's corporate values, stakeholder and community expectations and the law.

The Act requires reporting entities to address seven criteria in its annual modern slavery statements. The Group addresses each criterion below.

Criterion 1 – identify the reporting entity

The reporting entity is Noumi Limited ABN 41 002 814 235. This statement is a joint statement made by Noumi Limited and its wholly owned subsidiaries.

Criterion 2 - describe the reporting entity's structure, operations and supply chains

Noumi Limited is a company incorporated in Australia with annual revenue that exceeds the Modern Slavery Act's minimum mandatory reporting threshold of \$100 million.

Noumi Limited is listed on the Australian Stock Exchange (ASX:NOU) with most of its shareholders domiciled in Australia.

The Group's business is the manufacturing and supply of healthy food products throughout the domestic and international markets. Key product markets include dairy milk, plant-based beverages and nutritional products.

As of 30 June 2022, Noumi employed more than 580 people (including casuals), with 90% of our team employed in permanent full-time roles.

The Board of Noumi Limited (**Board**) has ultimate authority and oversight over the Group and regards corporate governance as an important element in achieving the Group's objectives. Accordingly, the Board has adopted appropriate charters, codes and policies and established several committees to assist in the discharge of its duties. The Group's corporate governance webpage¹ contains the charters, codes and policies which are periodically reviewed and updated.

The Group recognises the impact of COVID-19 and the potential increased risk of modern slavery in its supply chains and has implemented corrective actions to increase the awareness and reduction of such risks through policies, risk assessments and awareness training.

The Group's supply chains span across the globe and across its business sectors including its manufacturing, sales, distribution and general business activities.

Most of the Group's material suppliers are Australian, including its milk suppliers. The Group has approximately 52 direct milk suppliers from dairy farms across Australia.

In addition to its milk suppliers, the Group has approx. 50 key raw materials and packaging suppliers, the majority of which are located in Australia.

The Group has mapped out its supply chains and consolidated the data into its material suppliers by total dollar expenditure. This data will be the principal focus area for ongoing analysis in each future reporting period and will be updated accordingly.

The Group continually works with key suppliers to review supply agreements and suppliers' statements as part of the invoicing and service level agreements in line with Noumi's Modern Slavery and Anti-Human Trafficking Policy (**Policy**) to ensure risks in an evolving supply chain are promptly identified and addressed. Noumi requires suppliers and customers to comply with this Policy by reference to Noumi standard terms and conditions on all invoices and purchase orders.

For FY23, Noumi will further support its team members by building leaders' communication skills to embed two-way feedback into everyday operations, with a particular focus on company culture, our values, and workplace safety.

This annual declaration ensures all suppliers in the Noumi supply chain undertake an annual self-compliance check, are operating in a socially acceptable manner, in compliance with all legislative requirements, meets Noumi's policies and meets the reporting requirements of the Act.

Figure 1 shows the countries in which Noumi operates, the approximate percentage of its overall operations in each country and the risk of modern slavery in each country with green meaning a highly unlikely to be any risk and amber meaning a potential but low level of risk.

¹ <https://www.noumi.com.au/investors/corporate-governance/>



Figure 1

All providers within the Noumi’s supply chain, must provide an annual declaration of compliance with the Act and the Policy. This annual declaration ensures all suppliers undertake an annual self-compliance check, are operating in a socially acceptable manner, in compliance with all legislative requirements and comply with Noumi’s policies.

Although not undertaken currently, it is proposed that in future further additional steps will be undertaken with respect to suppliers located in countries with an amber level or risk to provide an additional level of assurance with the Act and the Policy.

Criterion 3 - describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

The Group’s risks assessment process centred around the principles of the Slavery & Trafficking Risk Template (**STRT**) by the Social Responsibility Alliance (**SRA**). The STRT is an open-source industry framework used by many companies to assist their efforts to comply with human trafficking and modern slavery legislation and improve their supply chain-related public disclosures. Noumi has implemented the STRT framework to help Noumi and its suppliers work together to build socially responsible supply chains by facilitating accurate data collection.

Within the Group’s operations, there is a small number of migrant workers which have been identified as a potential modern slavery risk. Some of these migrant workers are directly employed by the Group and others are employed through third party employment services providers. While many of the Group’s migrant workers are Australian permanent residents or holders of temporary and/or skilled worker visas that allow them to work in Australia, the Group recognises the increased vulnerability of migrant workers and continues to take steps to uphold and maintain all work rights and ethical standards.

However, the Group’s management processes, including working rights checks (both initial and ongoing) and onboarding procedures, has resulted in a low risk assessment of modern slavery in relation to its migrant workers.

Criterion 4 - describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

The Group along with many of its own suppliers and customer use Sedex which is one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains. Sedex provides practical tools, services, and a community network to help companies improve their responsible and sustainable business practices, and source responsibly.

Annual audits by the Group suppliers and customers who use Sedex require the Group to supply data and satisfy the Sedex requirements which are confirmed during the site visits. The Group has successfully completed all Sedex audits without any concerns or issues raised.

The Group is committed to achieving the following equal employment opportunity objectives:

- ensuring that all recruitments and promotions are based on objective assessments to determine the best qualified candidates for the role.
- ensuring all employees are treated fairly in a safe and respectful work environment through internal policies and company culture; and
- fully utilise and develop the potential of every employee.

The Group has implemented various policies, programs and procedures to mitigate modern slavery risks across its operations and supply chains. These include, but are not limited to:

- ensuring all Group team members hold relevant working rights in Australia and ensuring compliance with all visa conditions where applicable;
- training for team members covering fundamental governance principles, including the Groups code of conduct, grievance mechanisms, workplace behaviours;
- resources dedicated to human resource management and policies to address modern slavery and anti-human trafficking;
- high union membership and engagement;
- resources, systems and processes to administer team member payments; and
- incorporating obligations within its contracts with third parties to mitigate modern slavery risks in its supply chains both up and down stream.

In addition, the Group also utilises third-party systems and databases to guide and streamline its supplier risk assessment process which requires suppliers to complete a questionnaire through Sedex and the SRA. These questionnaires:

- help the Group obtain key data about its supplier's operations which can be used to support its modern slavery risk assessments;
- allow the system itself to generate an initial risk profile; and
- provide a repository of suppliers and key details to assist program administration.

Once a supplier risk is identified by the Group, suppliers may be required to undertake an ethical audit.

In most circumstances, any suppliers that are assessed as high risk will require an audit every 12 months and a supplier assessed as moderate risk will require an audit every two years.

Through suppliers' participation in the Group's risk assessments, the Group can monitor and evaluate its upstream supply chain and take appropriate actions to mitigate risks.

While non-conformances identified during these risk assessments and audits have not identified any confirmed cases of modern slavery, the Group will continue to monitor its operations and supply chains for any indicators of modern slavery risks being present.

Over this reporting period, the Group has made significant progress in implementing policies and procedures to support assessment of modern slavery risks in its own operations and through its supply chains.

The Group periodically executes formal written agreements with its customers and suppliers. These agreements contain express provision required both parties to comply with the Act and the Groups various polices including the Policy.

In addition to contractual obligations, the Group requires annual declarations of compliance with the Act and the Policy. This declaration ensures all suppliers undertake an annual self-compliance check to ensure that they are operating in a socially acceptable manner, in compliance with all legislative requirements, in compliance with the Group policies.

Criterion 5, 6 and 7 - describe how the reporting entity assesses the effectiveness of these actions; describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement); and provide any other relevant information.

This Group's comprehensive review of the modern slavery risks across its operations and supply chains has been affected by COVID-19 due to the reduced ability to coordinate reviews of the supply chain and operations associated with customer services. As such, assessment of the Group's controls and actions will be rescheduled in the next reporting period.

The comprehensive review that was undertaken in preparation for this joint statement included a review of the operations of the entities which Noumi Limited owns and controls. The Group's standards and polices can be found on the Noumi corporate governance webpage².

The Group believes that its continued efforts to assess, monitor and mitigate modern slavery will further contribute to its ethical culture across the business and increase awareness of the importance of the abolishment of modern slavery throughout its supply chains.

This statement has been approved by the Board of Noumi Limited.



Genevieve Gregor
Chair & Non-Executive Director

² <https://www.noumi.com.au/investors/corporate-governance/>