

GOODMAN FIELDER PTY LIMITED MODERN SLAVERY STATEMENT 2023



INTRODUCTION

At Goodman Fielder, we strive for sustainability in our operations and are committed to doing business in a way that is ethical, respectful and ensures the most vulnerable are protected from exploitation. To that end, we are continuing to build on previous efforts in relation to managing modern slavery risks and ethical sourcing practices.

This joint Modern Slavery Statement covers the period of 1 January 2023 to 31 December 2023 (**CY23**). This Statement will describe the structure, operations, supply chain, risks of modern slavery, and actions to assess, and address those risks and consultation processes for the reporting entities.

This Statement has been prepared by Goodman Fielder Pty Limited in its own capacity and on behalf of the following entities, which it owns and that are reporting entities under the *Modern Slavery Act 2018 (Cth)* (**the Act**):

- Goodman Fielder Pty Limited;
- Goodman Fielder Consumer Foods Pty Limited; and
- Quality Bakers Australia Pty Limited

(Together **Goodman Fielder** or **GF**)

Internal stakeholders of each of the above entities were consulted and have provided input into this Statement.

The Board of Goodman Fielder Pty Limited approved this Statement on 28 June 2024 on behalf of all entities that it owns or controls that are reporting entities under the Act as at 31 December 2023.



Matthew Albion
Managing Director

OUR ORGANISATIONAL STRUCTURE, OPERATIONS AND SUPPLY CHAIN

OUR STRUCTURE

Goodman Fielder Pty Limited is a privately-owned company, registered in Australia. It is an indirect, wholly owned subsidiary of Wilmar International Limited (**Wilmar** or **Wilmar International**), Asia's leading agribusiness group. As at 31 December 2023, Goodman Fielder Pty Limited had 32 subsidiaries, operating in 3 jurisdictions (the **Subsidiaries**) and is one of Australia's leading food companies. Operations in Australia include a major support office (with associated R&D facilities), 12 manufacturing sites and a network of 58 depots. These operations are supported by a national sales and distribution network.

Goodman Fielder Pty Limited and its subsidiaries share centralised governance, procurement, finance and legal functions together with common policies and procedures.

OUR OPERATIONS

Goodman Fielder manufactures, packages, distributes, markets and sells a wide range of food products in Australia. Together with our offering of retail and consumer products, GF also services the industrial and food service segments including in the hospitality, healthcare and government sectors.

Goodman Fielder has a significant portfolio of brands, including MeadowLea, White Wings, Helga's and Praise. Goodman Fielder's leading product offering is supported by efficient and effective distribution networks that enable delivery to over 8,000 outlets every day including supermarkets, service stations and institutional customers (eg hospitals and aged care facilities).

While Goodman Fielder manufactures the majority of its products internally and typically in the market in which they are sold, some GF products are manufactured outside of the market and in some instances, by third party manufacturers. To manufacture its products made or produced in Australia, Goodman Fielder works with over 1,700 suppliers globally.

Goodman Fielder Australia employs approximately 1500 people.

OUR SUPPLY CHAIN

Goodman Fielder's supply chain is diverse, with more than 200 direct suppliers and over 1500 indirect suppliers across approximately 30 countries. While most of Goodman Fielder's key ingredients are sourced locally, for example flour, sugar, grains and milk, our broader supply chain extends into Asia, North America, Europe and South America.

Our supply chain includes the procurement of:

- Raw ingredients;
- Manufacturing equipment and parts;
- Externally manufactured finished goods;
- Packaging;
- Indirect materials such as uniforms and personal protective equipment;
- Maintenance, cleaning and other services;
- Warehousing, linehaul and logistics services; and
- Professional services including IT, recruitment, travel and marketing.

Where feasible, Goodman Fielder endeavours to partner with related entities from the Wilmar International Group. Generally, this provides us with greater oversight of the materials/ingredients being sourced.



MODERN SLAVERY RISKS

In CY21, Goodman Fielder conducted a thorough analysis of our supply chains and considered our potential to cause, contribute or be directly linked to modern slavery risks. Since undertaking that initial analysis, we have continued to use and apply its findings as a framework for further actions and training relating to modern slavery risks and prevention, including those carried out in CY23 as described below.

The third-party suppliers deemed to have the highest potential for modern slavery risks, include:

- Logistics providers
- Cleaning providers
- Third-party labour and
- Suppliers of the following commodities:
 - Cocoa powder;
 - Rice; and
 - Palm Oil.

Goodman Fielder is committed to prioritising ongoing targeted assessments of our third-party suppliers which fall into the above categories, with a view to identifying modern slavery risks and mitigating these risks as required. More specifically, in CY23 we continued to conduct SEDEX risk assessments of third-party suppliers, audited domestic suppliers in relation to compliance with workplace laws and identified and triaged third-party supplier risk based on ingredient type and/or country of origin.

KEY ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Goodman Fielder has made an ongoing commitment to support and uphold human rights, and to take measures that will mitigate modern slavery risks in our operations and supply chain. Goodman Fielder is guided by the United Nations Guiding Principles on Business and Human Rights, specifically:

- A policy commitment to respecting human rights;
- An ongoing human rights due diligence process to identify, prevent, mitigate and account for how the business addresses impacts on human rights;
- Processes to enable the remediation of any adverse human rights impacts the business has caused or contributed to; and
- A process for reporting and continuous improvement.

These commitments and processes are reflected in Goodman Fielder's policy framework, which includes the following:



These commitments and processes are reflected in Goodman Fielder's policy framework, which includes the following:

- **(Wilmar Group Policy) No Deforestation, No Peat, No Exploitation (NPDE) Policy:** This Policy sets out the Wilmar Group's commitment to respecting and promoting human rights across its operations and supply chain, and explicitly prohibits the use of forced labour, bonded labour, and child labour within Wilmar's operations and supply chains. Available on the Wilmar international website.
- **Ethical Employment Policy:** GF's internal Ethical Employment Policy ensures that employees are aware of their obligations to maintain an acceptable and satisfactory level of conduct and personal behaviour, which includes a commitment to human rights as required by applicable law and internationally recognised standards reflected in various treaties and conventions.
- **Modern Slavery Policy:** Established during CY23, GF's Modern Slavery Policy has provides a framework for assessing and monitoring modern slavery risks in GF's operations and supply chains and provides a grievance mechanism for any modern slavery related complaints received. Further detail about the Modern Slavery Policy is set out below. Available on the Goodman Fielder website.
- **Whistleblower Policy:** The GF Whistleblower Policy promotes a culture of honesty and integrity in business dealings and creates a safe and supportive environment for individuals to report genuine concerns about potential, suspected or actual misconduct, including those relating to human rights and modern slavery issues. If an individual suspects that actual or potential misconduct within GF's operations or supply chains has occurred or is occurring, they can be confident that their disclosure will be acted upon timely and dealt with appropriately. In accordance with applicable whistleblower protection laws, they can also be confident that they will not be subject to any disadvantage, retribution or victimisation for raising their concerns. Available on the Goodman Fielder website.

In CY23, we took some key actions to address our modern slavery risks, which are explained in detail below.

OUR OPERATIONS

Goodman Fielder's focus for CY23 was to strengthen the modern slavery framework that we have been developing since CY21. This framework utilises the Supplier Ethical Data Exchange (SEDEX) platform, which is the largest collaborative platform for sharing ethical supply chain data. Through the use of SEDEX self-assessment questionnaires (SAQs), GF is able to identify and respond to modern slavery risks across our operations and supply chain on an ongoing basis by implementing appropriate measures.

In CY23 GF continued to review its Enterprise Bargaining Agreements in Australia for compliance with the Ethical Trading Initiative (ETI) Base Code requirements in relation to excessive working hours and found that 95% of the agreements were compliant with the ETI Base Code requirements. This is an ongoing process which will continue to be raised as a priority in EBA discussions. In any event, all Goodman Fielder Enterprise Agreements have robust provisions regarding hours worked, payment for hours and maximum hours. These provisions substantially address the risk of excessive working hours and wage non-compliance, and thereby contribute to the framework helping to safeguard our own operations from potential modern slavery risks.

In CY23, all GF sites in Australia maintained their SEDEX annual requirement for SEDEX self-assessment questionnaires.

OUR SUPPLY CHAIN

In CY21, Goodman Fielder carried out a thorough assessment of our supply chain against a risk framework, which looked at risks such as inherent commodity/material/service risk, source location and category of spend. Since then, we have used that assessment as a framework to identify and prioritise our efforts on the highest risk suppliers in our supply chain. These efforts continued to be our focus in CY23. In particular, we have continued to prioritise onboarding higher risk suppliers onto the SEDEX Platform where they will complete a self-audit of their social and business practices and follow any resulting SEDEX processes.

GF Suppliers on SEDEX – SAQ and SMETA (Sedex Members Ethical Trade Audit) completion rates

In CY23, Goodman Fielder increased the number of suppliers with whom we are linked on SEDEX, which, at the date of this Statement, stands at 161 suppliers, comprising 201 individual sites. All of the suppliers with whom GF is linked on SEDEX have completed or commenced SAQs and 92 of those have had an audit as at the date of this Statement. We are continuing to work with suppliers to increase this number, which will be done through collaboration and prioritisation of higher risk suppliers focusing on high risk countries and ingredients.

A priority for CY23 was to increase SMETA audit rates and a further 39 SMETA audits were carried out at supplying facilities, including 9 high risk sites. Goodman Fielder is continuing to work with 5 sites that are required to resolve non-conformances for audits that were conducted in CY23. Priority is being given to those non-conformances that received a high risk rating in the SMETA audit, such as instances where the auditor was unable to verify the wages and labour hours of suppliers' employees due to the absence of relevant records.



Focus on Commodity Risks

Rice

Goodman Fielder does not source rice directly from primary producers; however, we have made considerable progress in engaging with our rice suppliers to investigate any instances of modern slavery in the rice supply chain.

In CY23, one of GF's major rice suppliers in India underwent a SMETA audit. Three (3) non-conformances were identified and are being addressed for resolution. GF will continue to work with our suppliers to identify and address potential risks across the rice supply chain.

Cocoa Powder

Goodman Fielder procures finished goods from third-party suppliers which use cocoa powder in our White Wings products (including baking mixes and fillings) and private label products.

For some GF product ranges, GF continues to require that any cocoa sourced in the manufacture of our products is from suppliers who are certified by either the Rainforest Alliance or Cocoa Horizon's programs.

Palm Oil

GF is a member of the Roundtable on Sustainable Palm Oil (**RSPO**) and has been since 2005. We continue to adhere to RSPO's Principles & Criteria, which include human rights standards that help to mitigate modern slavery risks. GF supports the production of sustainable palm oil and in 2014, Goodman Fielder committed to sourcing certified sustainable palm oil (CSPO) for all Goodman Fielder products in Australia using the mass balance supply chain model. In support of this commitment, we have achieved supply chain certification for all GF manufacturing sites in Australia that handle ingredients containing palm oil.

As part of the requirements for maintaining RSPO certification of our manufacturing sites, we undertake a multisite certification audit annually, including an audit of our head office processes. This annual process is an opportunity to continually improve and hold ourselves accountable to delivering on our commitment to RSPO, including as it relates to human rights standards. For our CY23 audit, GF received four non-conformances, however, these non-conformances were unrelated to human rights violations or modern slavery. GF has expanded its RSPO training program beyond our direct staff and is now working with our third party suppliers that handle palm oil materials on their understanding of the RSPO Principles & Criteria.

Focus on Third Party Service Providers

Logistics Providers

GF relies on independent contractors as part of our baking logistics network. These independent contractors undertake tasks such as delivery of bread from our bakeries or depots to our customers. They also undertake merchandising tasks. GF's evaluation of risk in this area identified that because of the nature of these roles, there is the potential for an increased risk of unfavourable working arrangements, particularly in the areas of working hours, working conditions, wages and workplace health and safety. GF is also conscious of the potential for modern slavery issues to arise in these circumstances. To combat this, GF utilises its ongoing monitoring and audit program which seeks to identify and mitigate risks, including those related to modern slavery.

In 2023, we continued to monitor these risks (including the risk of modern slavery occurrences) within our network of delivery contract drivers. The actions carried out during CY23 in this regard included the following:

- 202 confirmations that previously signed statutory declarations from independent contractors affirming their compliance to applicable workplace laws (indicating 100% compliance), were still valid.
- 34 new contracts and 119 contract renewals signed in 2023 requiring compliance to chain of responsibility laws.
- Independent contractors' delivery drivers undertook daily logging of their workplace hours, which showed 100% compliance to legal working hours across approximately 2 million annual deliveries.
- Chain of responsibility training was completed by 626 drivers.
- 10 independent contractor audits conducted, all identified as low risk, bringing total audits completed to 320 over the past six years.

Cleaning

GF engages external cleaning companies to ensure its facilities are maintained to the highest standards of hygiene and cleanliness. The use of unskilled and sometimes temporary labour in this area by external cleaning companies, together with high labour intensity and low oversight increases the potential for adverse working conditions. To counteract this, from June 2022, GF's default position in Australia is that it will include targeted modern slavery clauses in any new agreements with cleaning companies.

In CY23 GF undertook an audit of our head office cleaning supplier. We provided a questionnaire to the supplier to enable them to carry out a thorough review of their employees' pay and conditions and visa status. GF had direct discussions regarding employment conditions with both the cleaning contractor and the cleaning employee themselves and the supplier was able to show the appropriate documentation. Through the audit process, no modern slavery concerns were uncovered.

Third-party Labour

GF continues to acknowledge an increased risk of unfavourable working arrangements among workers who are employed by third-party labour hire companies or through complex labour value chains. Third-party labour hire companies may be contracted to provide operational support, cleaning or IT services. In an effort to mitigate the risk of modern slavery in this area, since June 2022, GF's default position in Australia has been to include targeted modern slavery clauses in any new labour hire agreements.

During CY23, GF executed a contract variation with one of its major labour hire suppliers in order to incorporate specific modern slavery commitments into the contractual arrangements with that supplier. As a result, our two largest labour hire suppliers (who together provide over 80% of GF's labour hire spend) have now both entered into contractual commitments whereby the supplier has agreed to comply with various ethical sourcing and Modern Slavery commitments, including adherence to the Goodman Fielder Responsible Sourcing Code of Conduct (described in detail below). No modern slavery issues have been raised since they agreed to operate under these provisions.

GOVERNANCE AND POLICES

Goodman Fielder understands the importance of a robust governance system to support our commitment to upholding fundamental human rights. In CY23, we took the steps described below to enhance our existing governance framework.

Modern Slavery Policy

GF is committed to doing business in a way that is ethical and respectful and ensures that the most vulnerable are protected from exploitation. In order to deliver on this, GF is committed to ensuring that all laws and regulations relating to modern slavery are upheld in both our workplaces and supply chains.

In CY23, we introduced a standalone internal and externally-facing Modern Slavery Policy in respect of GF's Australian operations. The Modern Slavery Policy consolidates our position and outlines the kinds of mechanisms and controls that GF may employ to identify and mitigate modern slavery risks in our supply chains and operations, including measuring the effectiveness of and continuously reviewing and seeking to improve our modern slavery initiatives. Our Australian leadership team, led by our Managing Director, is ultimately responsible for ensuring that both GF and its external stakeholders uphold GF's commitments set out in the policy. The Modern Slavery Policy also establishes a related Grievance Procedure (detailed below) and complements existing policies that are relevant in this space including our Ethical Employment Policy and Whistleblower Policy.

To complement training on the Modern Slavery Policy delivered to our procurement teams in CY23, further targeted training, including for GF's Australian leadership team, will be carried out during the course of CY24.

Grievance Procedure

In conjunction with the introduction of the Modern Slavery Policy, during CY23 we also introduced a specific and related Modern Slavery Grievance Procedure. The Grievance Procedure is integral to the effectiveness of the new Modern Slavery Policy. The Grievance Procedure is a comprehensive procedure that provides internal and external stakeholders with the information necessary to enable them to raise a grievance which is relevant to GF's commitments under the Modern Slavery Policy against any party in the Goodman Fielder supply chain and/or our owned operations. The Grievance Procedure also acts as a framework for the business to ensure clarity and consistency in the event a grievance is raised.

As part of introducing the Grievance Procedure, GF's existing Whistleblower Policy was also amended during CY23 to explicitly confirm that modern slavery-related complaints can also be received through the existing GF Whistleblower Policy, but that the specifically designed Modern Slavery Grievance Procedure will apply to all modern slavery related complaints regardless of how the complaint is received.

Available on the Goodman Fielder website.

GOVERNANCE AND POLICES

Responsible Sourcing Code of Conduct

GF is working to ensure that our business is fit for the future, and we know that our success is reliant on thriving, productive supply chains. We have a publicly-stated goal to source 100% of our ingredients sustainably by 2030 and our suppliers are critical partners for this ambition. We are continually seeking and welcoming of opportunities to work collaboratively with our suppliers to achieve our collective sustainability goals, and our Responsible Sourcing Code of Conduct (**Code of Conduct**) is one example of this.

The Code of Conduct outlines the standards and principles that GF expects our suppliers to adhere to when conducting business with us and forms part of our written contracts with suppliers. Since the Code of Conduct was reviewed and updated in CY21 to ensure that modern slavery, human rights and business ethics risks were adequately addressed, GF has increasingly incorporated an express commitment by its suppliers to comply with the Code of Conduct into its contractual arrangements with its suppliers, which continued throughout CY23.

The commitments set out in the Code of Conduct include explicit bans on the use of forced labour, bonded labour, and child labour, an expectation that workers should enter into employment voluntarily with clear written employment agreements and have the freedom to terminate their employment, a requirement to provide safe and healthy working environment for all employees and mandates in relation to employees receiving fair wages that meet or exceed legal minimums and industry standards, along with appropriate benefits, accompanied by payment practices which are transparent and regular.

Available on the Goodman Fielder website.

Training

Goodman Fielder understands the importance of our employees having a solid knowledge and awareness of modern slavery. We recognise that this is especially important for certain functions within our business who have primary responsibility for and oversight of GF's operations and external supply chains, such as our procurement, supply chain, and operations teams.

In conjunction with the introduction of the Modern Slavery Statement, in CY23 we conducted targeted and bespoke modern slavery training with the GF Australian and New Zealand Procurement teams. Further bespoke training for the Australian leadership team and the Operations teams is intended to be rolled out during the course of CY24.

The training will build awareness of modern slavery for all GF employees and will enable our staff to identify potential and actual risks in our operations and supply chain. It will also ensure that all employees are familiar with our Modern Slavery Policy, Grievance Procedure and Code of Conduct.



EFFECTIVENESS MEASURES AND CONTINUOUS IMPROVEMENT

Goodman Fielder is committed to an ongoing review of our modern slavery program by continuously assessing the effectiveness of the measures we implement.

We have assessed the actions we committed to in our CY22 Statement and provide the following summary of the key actions we have taken against the effectiveness measures set for those actions:

Governance and Management Frameworks

In CY23, GF launched a standalone Modern Slavery Policy in respect of GF's Australian operations, as well as a specific and related Modern Slavery Grievance Procedure. The Modern Slavery Policy and Grievance Procedure have since been rolled out across the Australian business, with all Australian GF employees expected to be aware of and act in accordance with the policy and related grievance procedure, as relevant to their individual functions. These actions fulfilled the corresponding effectiveness measures set in our CY22 Statement.

Risk Assessment/ Due Diligence

An action to continue to increase the number of suppliers on SEDEX and increase SMETA audits rates for those suppliers was also set as a 2023 Action in our CY22 Statement. The effectiveness measure was to assess the number of suppliers added to SEDEX and audits completed in CY23. As outlined in this Statement above, as at the date of this Statement, GF has increased the number of suppliers we are linked with on SEDEX to 161 suppliers comprising 201 individual sites. Additionally, 39 SMETA audits were carried out at supplying facilities during CY23. While progress was made in CY23 in relation to risk assessments and due diligence audits carried out on suppliers, GF recognises the need to continue to increase the number of our suppliers who are engaging with the SEDEX platform, including as GF onboards new suppliers. As such, GF will maintain this as an action in 2024.

Training

In our CY22 Statement, we committed to rolling out a Modern Slavery Training program in CY23, and set an effectiveness measure of that training program being rolled out to staff in relevant functions at GF's Head Office and at GF sites, and specialised training for employees who are dealing directly with suppliers and third parties. In conjunction with the launch and roll out of our Modern Slavery Policy, in CY23 we commenced the roll out of targeted modern slavery training, starting with the Australian and New Zealand Procurement Teams who are directly responsible for managing GF's engagement of GF's external suppliers and supply chain partners, and therefore have an important role to play in upholding GF's modern slavery commitments as relevant to our supply chains. Further bespoke training for the Australian leadership team and the Operations teams is intended to be rolled out during the course of CY24. Further rollout of the training program to other relevant functions and employees is required and will be an ongoing process. This is reflected in the effectiveness measures set for CY24 in this Statement below.

Targeted initiatives: third party service providers

In our CY22 Statement, we stated that our focus in this area would be to continue the rollout of an audit program for cleaning service providers, and amend our logistics contractor agreements and audit process to include specific modern slavery clauses and commence the rollout of the revised contract and audit framework. In CY23, we carried out an audit of our head office cleaning supplier, with no modern slavery risks identified. We now intend to conduct further cleaning service provider audits across our Australian manufacturing sites. In relation to logistics agreements and audit processes, GF reviewed and sought external advice in relation to updating our 'Independent Contractor Workplace Laws Compliance Tool Kit' to include a new chapter specifically covering modern slavery risks and compliance. The Tool Kit is provided by GF to its independent delivery and merchandising contractors to assist them to self-assess whether they are complying with applicable laws. Updates to the Tool Kit have subsequently been finalised and GF intends to roll out the updated Tool Kit, together with an updated version of its independent contractor agreement which will incorporate specific modern slavery commitments, in CY24.

Goodman Fielder’s priorities for CY24 will be as follows:

	2024 Action	Effectiveness Measure
Governance and Management Frameworks	<ul style="list-style-type: none"> • Embed Modern Slavery Policy in GF’s operations • Embed and monitor uptake of the Grievance Procedure 	<ul style="list-style-type: none"> • Modern Slavery Policy included in further targeted training • Grievance Procedure included in further targeted training and number of modern slavery related grievances monitored and recorded
Risk Assessment/ Due Diligence	<ul style="list-style-type: none"> • Continue to increase number of suppliers on SEDEX and increase SMETA audit rates for those suppliers • Close out any identified risks with suppliers 	<ul style="list-style-type: none"> • Number of suppliers added to SEDEX and audits completed • Number of high-risk issues outstanding (that is, not closed out)
Training	<ul style="list-style-type: none"> • Continue roll out of targeted Modern Slavery Training to leadership and relevant functions 	<ul style="list-style-type: none"> • Targeted training rolled out to staff in relevant functions at GF’s Head Office, and for employees at GF sites who are dealing directly with suppliers and third parties
Targeted initiatives	<p>Focus on the following identified risk areas:</p> <p>A. Continued rollout of audit program for cleaning service providers</p> <p>B. Amend logistics contractor agreements and audit process to include specific modern slavery clauses and commence rollout</p>	<p>A. Number of audits completed and (where applicable) remedial action taken by supplier</p> <p>B. Completion of update to logistics contractor audit questions and number of contractors audited. High risk items identified to be closed out with contractors</p>

CONSULTATION

Goodman Fielder’s Modern Slavery Statement has been developed in consultation with the Senior Executives of Goodman Fielder Pty Limited, each of whom oversees a group-wide function. The Senior Executives provided their feedback on the Statement prior to it being provided to the Board of Goodman Fielder Pty Limited for final review and approval on behalf of Goodman Fielder and its Subsidiaries. GF has also consulted with the Group Sustainability function of Wilmar International, being GF’s parent company. Wilmar International carries out regular consultation with external global stakeholders on Human Rights related matters.

APPENDIX

This Statement was prepared to meet Goodman Fielder’s reporting requirements. The table below references where the mandatory criteria set out in the Act are addressed in this Statement.

MANDATORY CRITERIA	LOCATION IN DOCUMENT
Criteria 1. Identify the reporting entity	Page 2
Criteria 2. Describe the structure, operations and supply chains of the reporting entity	Page 3
Criteria 3. Describe 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	Page 4
Criteria 4. 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 and remediation processes	Page 5 -10
Criteria 5. Describe how the reporting entity assess the effectiveness of such actions	Page 11 -12
Criteria 6. Describe the process of consultation with any entities that the reporting entity owns or controls	Page 12

**GOODMAN FIELDER PTY LIMITED MODERN SLAVERY STATEMENT
2023**

