

Bega Cheese Limited

2022
MODERN SLAVERY
STATEMENT



*creating great food
for a better future*

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About the Statement

We have prepared this statement in accordance with the Modern Slavery Act 2018 (Cth) (MSA or 'the Act'). This is a Joint Statement made by Bega Cheese Limited (ABN 81 008 358 503) of 23-45 Ridge Street, North Bega, New South Wales, 2550 and covers the wholly owned or controlled subsidiaries listed in Appendix A as reporting entities.

This Statement addresses our efforts in regard to modern slavery for the financial year 1 July 2021 to 30 June 2022 (FY2022).

In this Modern Slavery Statement, the terms "Bega", the "Company", "our business", "organisation", "we", "us", and "our" refer to Bega Cheese Limited, unless otherwise stated.

Bega Cheese Limited is a publicly listed company on the Australian Securities Exchange (ASX Code: BGA). To find out more about our business, you can visit www.begacheese.com.au.

About modern slavery

Modern Slavery is a global issue that is estimated to affect over 50 million people¹. It can take various forms, including the trafficking of people, forced labour, servitude and slavery.

The outcome is profound, affecting individuals, families and communities, depriving victims of their freedom.

Its impact is global, and no country is immune. The elimination of modern slavery is critical to effective human rights protection and sustainable development.



¹Fifty million people were living in modern slavery in 2022, according to the latest [Global Estimates of Modern Slavery](#). Of these people, 28 million were in forced labour and 22 million were trapped in forced marriage.

CEO Reflections on 2022

We are pleased to present our third Modern Slavery Statement. Through our acquisition of the Bega Dairy and Drinks business, the Company has now doubled in size in 18 months. During this period, we have worked hard on bringing together Bega Group while managing multiple challenges. The ongoing COVID-19 pandemic and significant flood events disrupted logistics, while geopolitical tensions added significantly to cost pressures.

In FY2022, we have focused on maintaining the smooth operation of the Bega Dairy and Drinks business. The acquisition of Bega Dairy and Drinks added cafes, impulse, government, aged care and healthcare to our traditional grocery, co-manufacturing and quick service restaurant customers, extending the range of products supplied to those customers and leveraging greater value from our distribution network.

Our vision is to become The Great Australian Food Company by creating great food for a better future. We continue to build on and consolidate our approach to sustainable development. While we have made progress in some areas, bringing together policies and data collection systems remains an area of focus for Bega Group. Our strategy – Greater Good – continues to provide direction. It is aligned to the United Nations Sustainable Development Goals (UN SDGs), specifically our contribution to the UN SDG 2 to end hunger, achieve food security and improved nutrition, and promote sustainable agriculture.

Addressing modern slavery risks transparently remains a priority. Our Ethical Sourcing Policy was updated this year to reflect a single approach for Bega Group. All of our new suppliers in FY2022 were screened using our ethical sourcing self-assessment questionnaire and all new suppliers assessed as medium to high-risk completed an independent compliance audit. We have identified high-risk commodities for their potential impact on the environment and people, including coffee, cocoa, rice powder and fish oil.

While we have more work to do, we are optimistic about how we can contribute to a more sustainable future.



Paul van Heerwaarden
Chief Executive Officer

20 December 2022

Our Purpose

CREATING GREAT FOOD FOR A BETTER FUTURE

Our purpose helps connect our people, customers, consumers, suppliers and the communities in which we operate. It helps guide strategy and decision-making and informs our values and behaviours.

We are proud of our heritage as an iconic Australian business with strong connections to agriculture and a passion for creating great food.

To deliver on our purpose for consumers we must anticipate consumer needs and food trends.





Introduction

Our purpose is “creating great food for a better future”. Our purpose helps connect our people, customers, consumers, suppliers and the communities in which we operate. It helps guide strategy and decision-making and informs our values and behaviours.

The Bega Group Greater Good strategy is aligned to the United Nations Sustainable Development Goals with a focus on addressing the impacts of our business and where we can contribute to sustainable development – our products, our people and communities and our planet².

To progress the work of the Greater Good strategy, Bega is developing a series of Pledges which will be underpinned by the principle of circularity:

- Bega’s Planet Pledge addressing our impacts and targets for waste, water, climate and packaging.
- Bega’s Wellbeing Pledge will address our impacts through products, promotion, education and sustainable diets.
- Bega’s Community Pledge will address our impacts through sourcing, farms, people and safety – and this includes human rights.

Integrity and ethical conduct in our operations and supply chain are critical to achieving this. We are committed to protecting and advancing human rights. We condemn modern slavery in all its forms. It is a violation of human rights and contravenes the values of our company and our people.

Our customers and consumers increasingly seek assurance that the products they purchase have been produced and sourced ethically. Our strong farmgate relationships means the provenance of much of our raw materials is known. Analysing our operations and supply chain to identify, manage and mitigate risks of modern slavery helps give customers and consumers the confidence they seek that they too have acted ethically in purchasing our products.

This Modern Slavery Statement 2022 sets out the issues, risks and mitigation actions taken by Bega in the financial year ending 30 June 2022. It outlines our continued efforts to:

- enhance and expand our program of work in relation to reducing the risk of modern slavery.
- effectively assess the risk of modern slavery across our business and supply chain.
- ensure we have in place the most appropriate responses for the risks we have identified.
- increase awareness of the risk of modern slavery.
- promote greater transparency.

We produced our first Modern Slavery Statement in 2020. Since then, we have worked to deepen and expand our approach. We are committed to continually developing our approach over time with feedback from stakeholders and through assessing the effectiveness of our actions.



Company Overview

Our operations

A collective of rural dairy farmers founded our business in Bega, New South Wales in 1899, keen to make a difference to their local industry and community. We listed on the Australian Securities Exchange in 2011 and now have over 20,000 shareholders.

In FY2022 the Bega Group generated top line normalised revenue of \$3.01 billion. Employing more than 3,800 people, today we own and operate 20 manufacturing sites across Australia and are supplied by around 4,000 suppliers. This includes more than 800 dairy farms, 155 peanut farms and more than 70 orchards. The acquisition of Bega Dairy and Drinks brought with it one of the largest cold chain distribution networks in the country enabling us to deliver food products to more than 95% of the Australian population. A full diagram of our company structure is included on page 12.

Bega has a portfolio of leading iconic brands in seven consumer categories. Many of these brands have become trusted household names by generations of consumers.

Our brands continue to be some of Australia's favourite household names. Our iconic Vegemite, along with our peanut butter range and honey, holds 32% of the Australian spreads market. We now also hold 50% of the milk-based beverage market and 25.1% of the yoghurt market. Through our joint venture with Vitasoy International Holdings Limited, we also hold 29.3% of the plant-based milk market in Australia. Increased consumption of grocery items in homes, due to the COVID-19 pandemic, has resulted in continued growth. We continue to innovate across our core brands such as Dare, Farmers Union,

Dairy Farmers and Daily Juice. We are also introducing new offers like 180 Nutrition Good Sport, a nutritional beverage, expanding Mildura into a sparkling fruit drink and extending our range into bulk food service pack formats.

We supply a range of high-quality products to the Australian food service industry from cheese to condiments, dressings, mayonnaise, spreads and portion control staples.

Our focus has been on maintaining our customer base during the COVID-19 pandemic by implementing contactless delivery. We have a broad range of domestic customers, including the key grocery outlets of Aldi, Coles, Woolworths and Independent Grocers as well as Petrol and Convenience, Route, Foodservice and Quick Service Restaurants channels across multiple Australian States.

Managing the past 12 months has been demanding and our team has been both highly resilient and customer focused to ensure that we have provided the very best service we could on any particular day. This has also allowed us to retain our customers where they have been able to continue to trade and secure new customers across cafes, government institutions and aged and healthcare sectors.

Alongside our retail business we also have an extensive business-to-business customer base including Fonterra, Kraft, Mondelēz, Bellamy's and Blackmores. Our international customer base includes manufacturers, retailers, distributors and agents in markets including South East Asia, China, Japan, Korea, United Kingdom, France and the Middle East.


























Category	Category size \$m	Category growth	Bega share	Brand portfolio
Fresh white milk ^{3,4}	1,942	1.4%	12%	   
Yoghurt ³	1,563	6.3%	25%	   
Milk based ^{3,4} beverages	851	2.3%	50%	     
Spreads ⁵	666	5.2%	32%	   
Chilled juice ³	620	5.2%	23%	  
Creams and custards ³	515	1.3%	10%	 
Water ice ³	54	8.2%	81%	 

Figure 1: Our brands.

³Data extracted from IRI Total Business Scan (AU grocery Unweighted and Structured Convenience) MAT 30 June 2022. Statements in relation to market share value data provided by IRI (and Bega's competitive position) are based on outside data sources, assumptions and weightings in combination with management estimates.

⁴Excludes non dairy

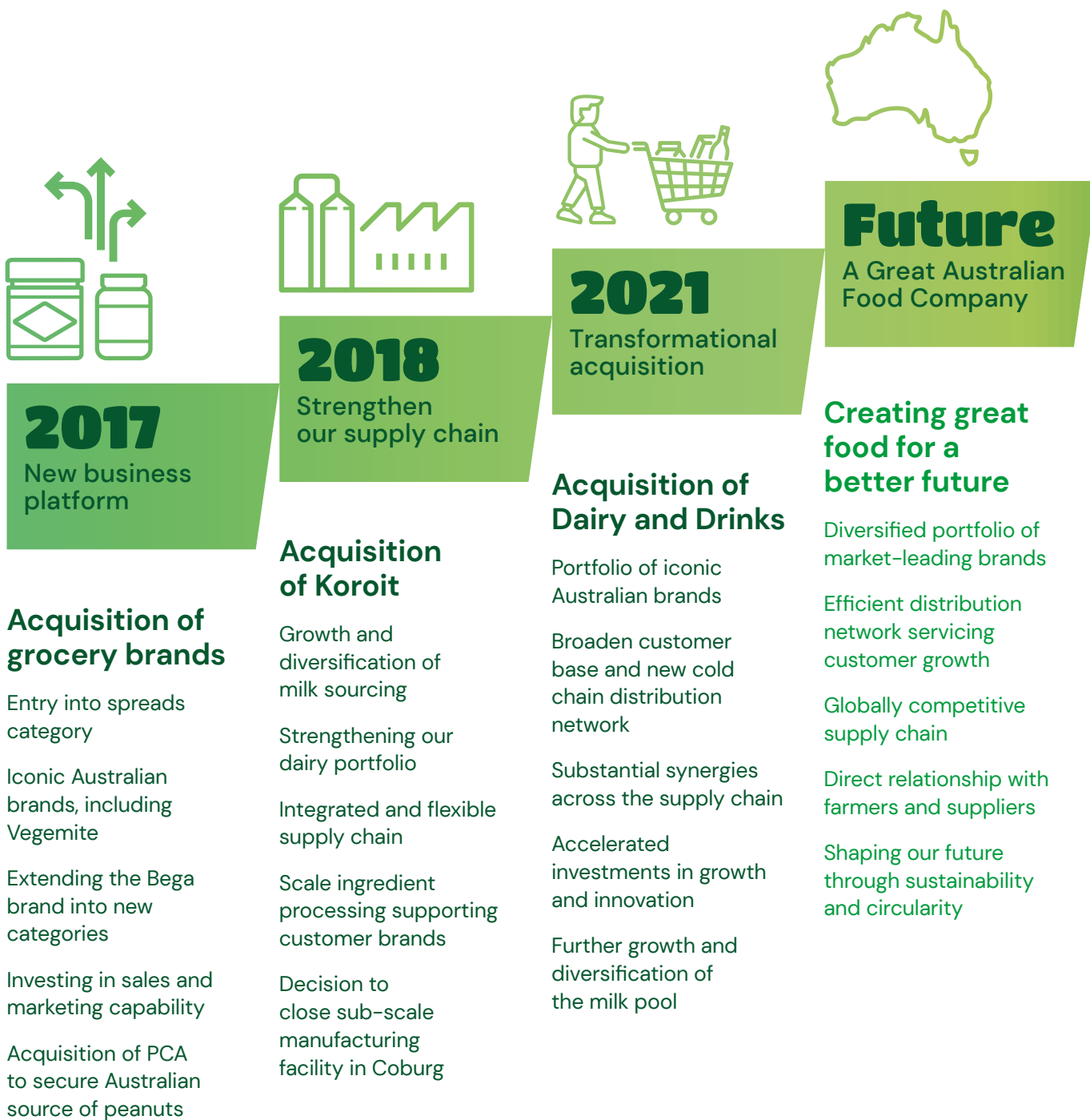
⁵Bega calculation based in part on data reported by NielsenIQ through its Scantrack Service for the Total Spreads category (Client defined), for the 52-week period ending 28 June 2022, for the Total Grocery Australia market (value). Copyright © 2021, Nielsen Consumer LLC

OUR TRANSFORMATION TO BECOMING A GREAT AUSTRALIAN FOOD COMPANY.

Our vision is to become The Great Australian Food Company by creating great food for a better future.



In FY2022 the Bega Group generated top line normalised revenue of \$3.01 billion. Employing more than 3,800 people, today we own and operate 20 manufacturing sites across Australia and are supplied by around 4,000 suppliers. The acquisition of Bega Dairy and Drinks brings with it one of the largest cold chain distribution networks in the country enabling us to deliver food products to more than 95% of the Australian population.



The Bega Group Footprint

Manufacturing Facilities

- 8 White Milk and Milk Based Beverages
- 1 Milk Based Beverages Hub
- 3 Cheese
- 2 Dairy Powder and Fats
- 2 Peanuts
- 2 Juice
- 1 Yoghurt
- 1 Spreads
- 1 Plant-based – Joint Venture

International Sales Offices

- Singapore Office
- China Office
- Malaysia Office

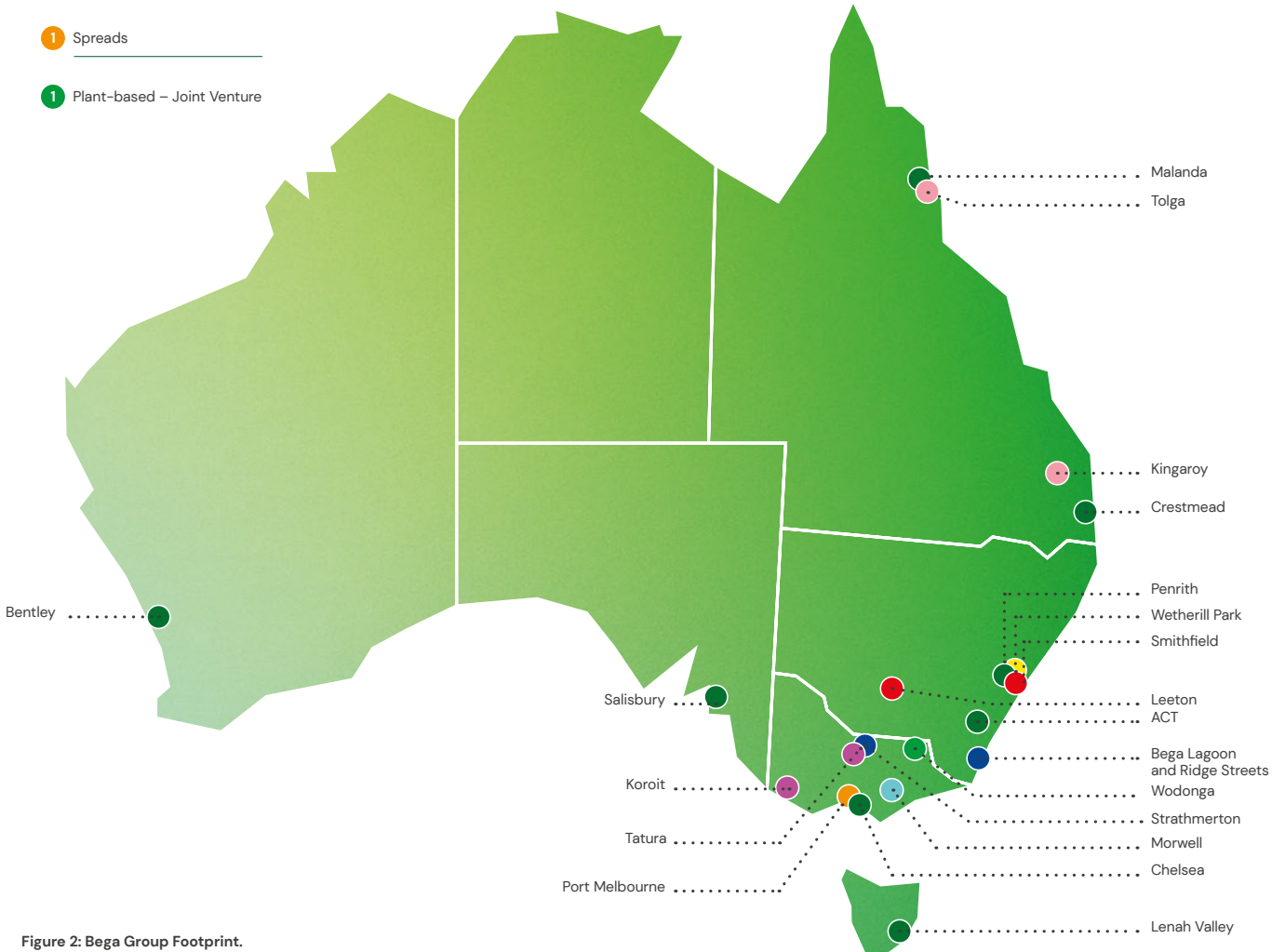


Figure 2: Bega Group Footprint.

Our People

Bega employs more than 3,800 people across our sites, distribution centres and offices. Our people are vital to our success and we are committed to creating a workplace where all people can thrive. We respect our employees' right to freedom of association and collective bargaining. Approximately 90% of our workforce are direct employees, with 57% of our workforce covered by collective bargaining agreements. We engage approximately 340 people (9% of our labour force) via labour hire.

Workforce by employment type and gender

	Female	Male	Non-binary ⁶	Total
Total workforce ⁷	1,132	2,703	1	3,836
Full time	882	2,465	0	3,347
Part-time	168	99	1	268
Permanent	981	2,491	1	3,473
Fixed term	69	73	0	142
Casual	82	139	0	221

Workforce by region and gender

	Female	Male	Non-binary	Total
Australian Capital Territory	9	27	0	36
New South Wales	329	866	0	1,195
Northern Territory	1	2	0	3
Queensland	121	269	0	390
South Australia	21	143	0	164
Tasmania	5	46	0	51
Victoria	625	1,267	1	1,893
Western Australia	21	82	0	103
Other	0	1	0	1

Age group of employees by category

	<30 years of age	30–50 years of age	50+ years of age
Board members (%)	0%	0%	100%
Management ⁸ (%)	2.72%	70.10%	27.18%
Non-Management (%)	14.64%	50.80%	34.56%
Workforce overall ⁹ (%)	13.01%	53.28%	33.71%

Freedom of association

	% of total workforce
Employees covered by collective bargaining agreements	56.8%

Figure 3: Workforce.

⁶Self-identified as Non-binary.

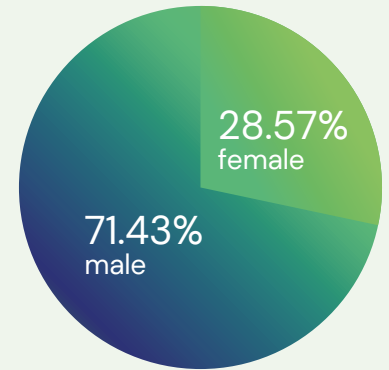
⁷Based on full time equivalent employees excluding external contractors.

⁸Includes senior executives.

⁹Bega Group.

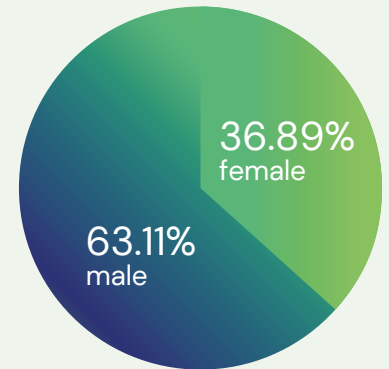
Board members

28.57% female and 71.43% male



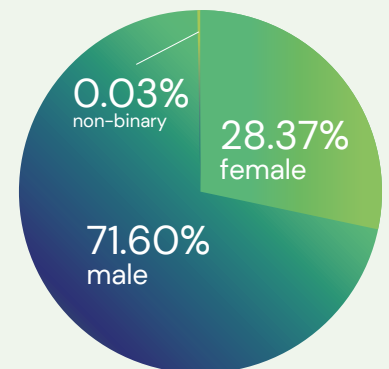
Management

36.89% female and 63.11% male



Non-management roles

28.37% female, 71.60% male and 0.03% non-binary



Overall workforce

29.51% female, 70.46% male and 0.03%¹⁰ non-binary

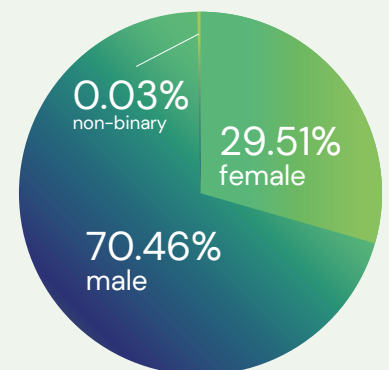


Figure 4: Gender representation in the workforce.

¹⁰Rounded to two decimal places.

Our Value Chain

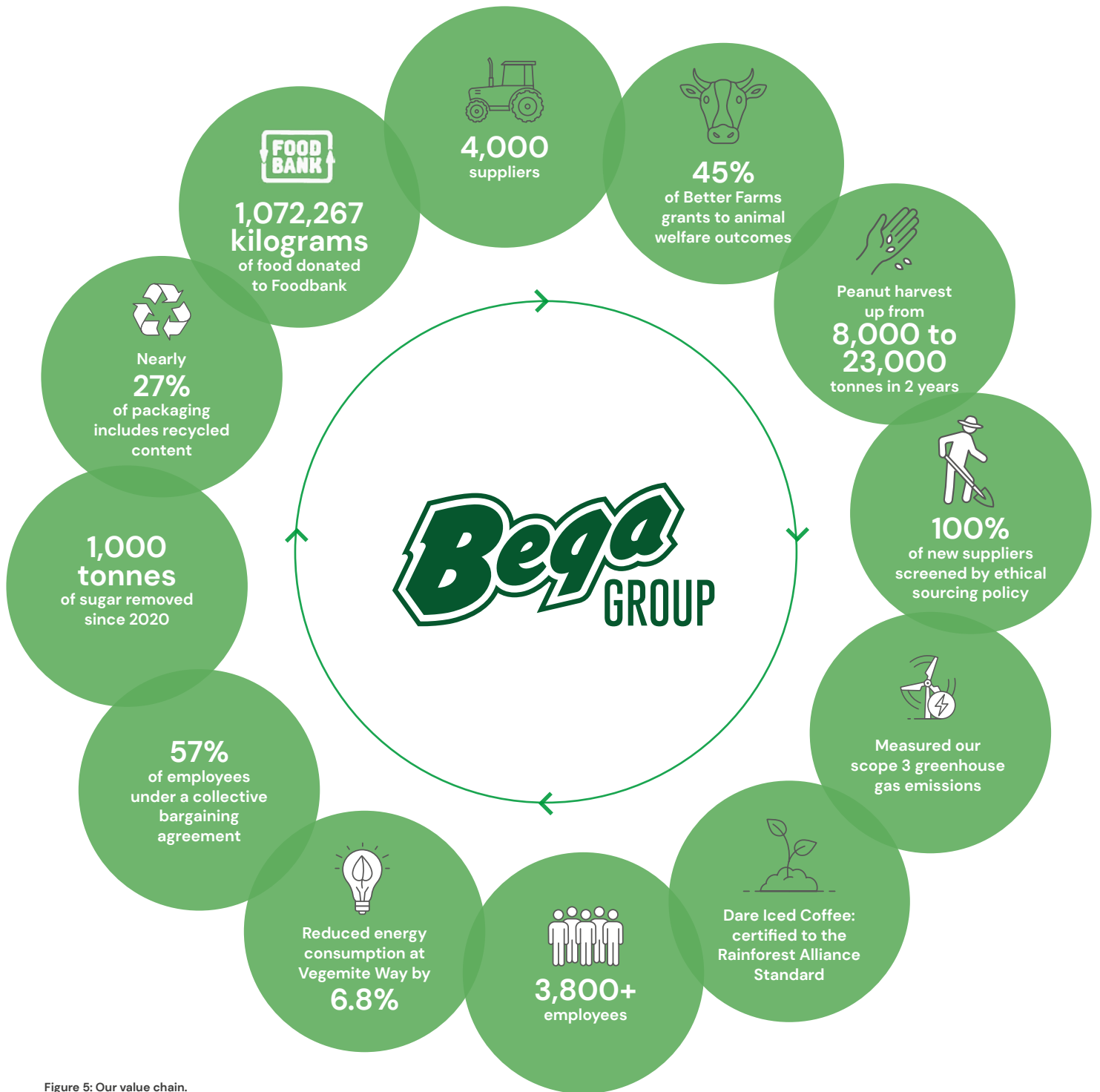


Figure 5: Our value chain.

Our Supply Chain

We have a complex supply chain with around 4,000 suppliers based both in Australia and overseas, in addition to those within our extended supply chain.

More than 85% of the Bega Group supply chain expenditure is in Australia. Local sourcing and long-term arrangements allow us to maintain a strong focus on quality and sustainability. Milk suppliers make up a large bulk of our top supplier expenditure.

The Bega Group was also impacted this year by disruptions to supply chains experienced globally. The conflict in Ukraine increased the costs of inputs and lockdowns in Shanghai, due to COVID-19, also disrupted the flow of products into major Asian markets.

Our supply chain relies on people’s passion and commitment to grow, milk, harvest and process raw food ingredients. The size of our business means we source large volumes of raw materials, goods and services. These include milk, peanuts, fruit, packaging, machinery, equipment, consumables, transport and logistics services.

Directly procured raw materials from dairy farmers, fruit, and peanut growers represent more than 50% of our supply chain expenditure. In FY2022, we sourced:

- 1.4 billion litres of milk
- 38,027 tonnes of citrus, and 4,849 tonnes of apples and pears from Victoria and New South Wales
- 23,000 tonnes of peanuts in FY2022, increasing from 8,000 tonnes in 2020.

We have dedicated teams that work closely with our farmers and growers, to ensure our policies, processes and requirements meet our expectations and those of our customers and consumers.

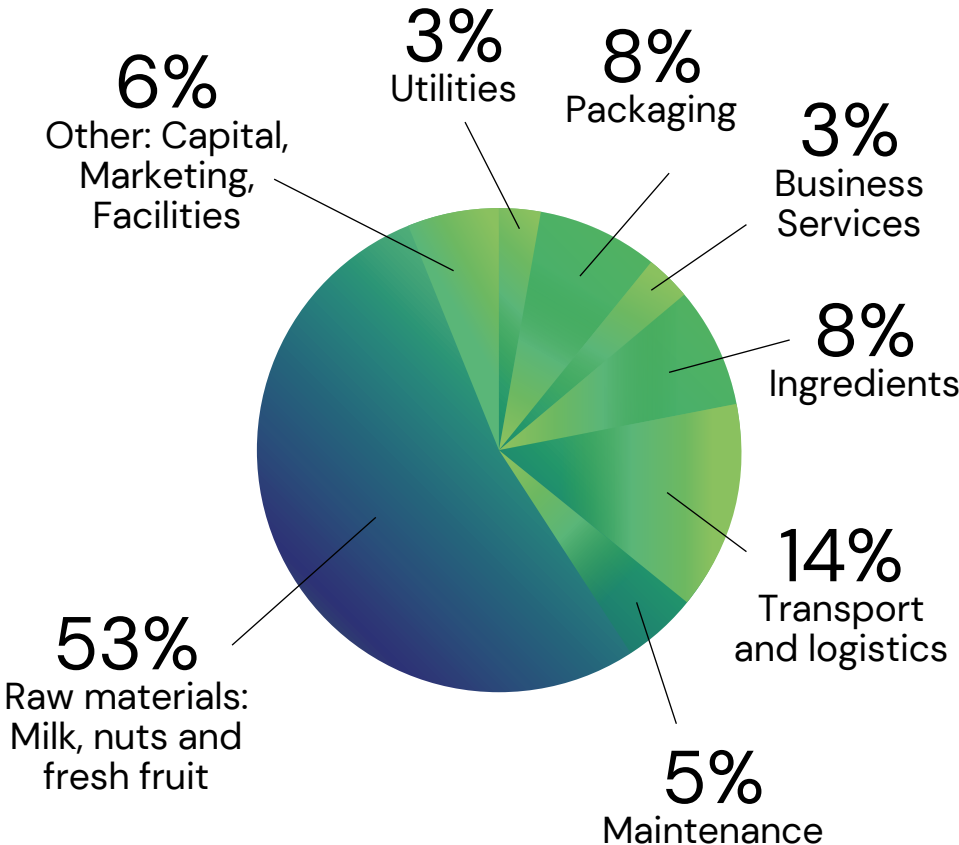


Figure 6: Bega Group supply chain by % of expenditure.

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GSI GOVERNMENT RESPONSE RATING

Most of our annual spend occurs with our Tier 1 suppliers in Australia (85%), followed by suppliers from New Zealand, the US and China. The following map depicts the proportion of annual spend with Tier 1 suppliers by country and their ranking relative to other countries, the change in proportionate spend since we last reported, and the modern slavery and Global Slavery Index (GSI) Government Response Rating for those countries using the GSI rating system¹¹.

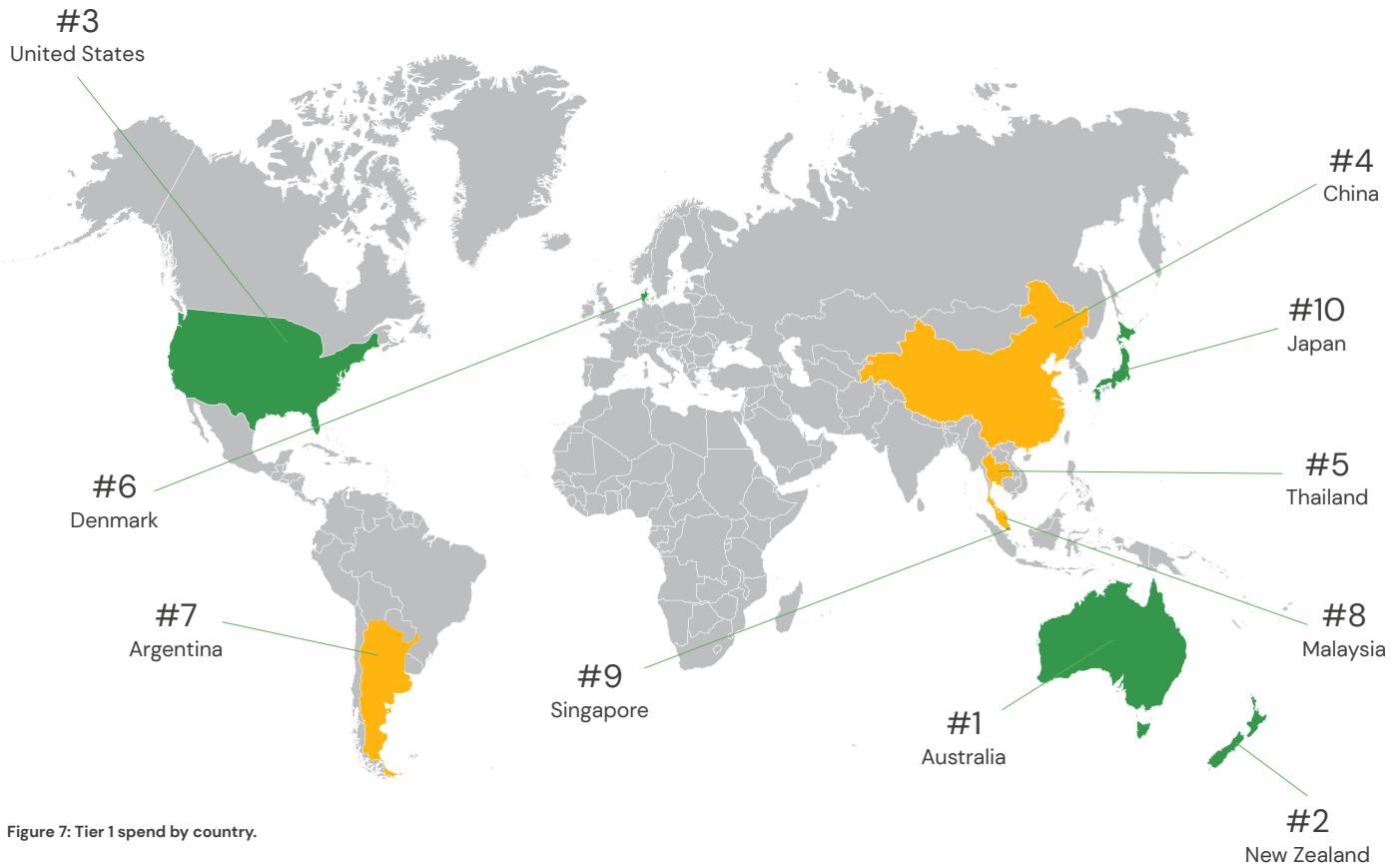


Figure 7: Tier 1 spend by country.

Rank	Country	Spend Current FY2022	Spend Previous FY2021	GSI Vulnerability	GSI Government Response Rating
1	Australia	82.8%	84.46%	4.27	AAA
2	New Zealand	5.13%	5.23%	1.91	AAA
3	United States	2.77%	2.83%	15.88	AAA
4	China	2.40%	2.45%	50.65	CC
5	Thailand	2.19%	1.83%	51.10	B
6	Denmark	1.65%	1.68%	10.44	BB
7	Argentina	1.14%	1.15%	28.88	BBB
8	Malaysia	0.52%	0.53%	39.23	CCC
9	Singapore	0.51%	0.11%	13.41	CCC
10	Japan	0.37%	0.38%	13.81	CCC

¹¹Source:

Global Slavery Index vulnerability rating represents the proportional vulnerability to modern slavery of the people within this country, due to other contributing factors such as conflict, corruption, inequality, minority groups, and lack of basic needs. The vulnerability rating is out of 100, with a higher number meaning greater vulnerability. The Government Response Rating varies from AAA to D and represents the national legal, policy and programmatic responses to modern slavery. Further information on the GSI methodology can be found here: Vulnerability | Global Slavery Index Country vulnerability score: www.globalslaveryindex.org

Our Modern Slavery Risks

We understand, in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPs), that our operations and supply chain could cause, contribute or be directly linked to adverse modern slavery risks and impacts. We take a proactive approach to the identification of risks. We consider modern slavery risk factors derived from the country of operation, related to the industry/sector or product, and in relation to potential high risk business models such as labour hire. We refer to Commonwealth Guidance for reporting entities as well as drawing on sources such as the Global Slavery Index, Verisk Maplecroft Human Rights Indices, International Labour Organisation and US Department of Labour reports. We also gain insights from our own monitoring data, advice from external consultants and internal workshops and consultation. We also consider how activity such as acquisitions affect our risk profile. For example, in 2021 we updated our risk review based on our Dairy and Drinks acquisition, and our FY2022 actions reflected this. When we onboard a new supplier we conduct an internal assessment to help verify the risk level. This includes the industry, spend and country of origin.

In the following section, we have outlined findings and reflections on our assessment of risk in both our operations and supply chain for the FY2022 reporting year. This is based on a review of our risks, which determined that our risk profile remains similar to when we last conducted a formal risk assessment.

Our operations

Bega employs more than 3,800 people across our sites, distribution centres and offices. As noted in the previous section, just over 90% of our workforce is permanent, with the other ~9% on fixed term or casual contracts. We consider the risk of modern slavery in our direct workforce to be low.

The most likely risks of modern slavery for operational activity similar to ours correspond to indirect workers engaged through the use of outsourced services or labour hire. The potential forms of modern slavery include bonded labour and deceptive recruiting practices in outsourced services such as cleaning, catering, security, and facilities management, or through the use of labour hire contractors. These are forms of modern slavery we could potentially be linked to, or potentially contribute to, via engagement of service providers or labour hire. We also engage seasonal workers, via labour hire, and this is addressed in the next section (Our supply chain). Controls we have in place in relation to operational risk are outlined in the following section (Our approach).





Our Supply Chain

As outlined in the previous section, we have a complex supply chain with around 4,000 suppliers based both in Australia and overseas, in addition to those within our extended supply chain.

To manage our modern slavery risk, we focus on the high and medium risk materials, products and countries within our supply chain.

We assess our supplier risks based on:

- Country of operation, we use the GSI rating to determine the country risk.
- Industry integrating commodity and service risk, this is measured using Verisk Maplecroft Human Rights Indices and US Department of Labour International Child Labor and Forced Labour Report.
- Other considerations including the degree of expenditure, and our degree of leverage.

The following table outlines the key risks we have identified, based on the extent to which we might potentially 'cause', 'contribute to', or be 'linked' to those risks. This aligns to the UN Guiding Principles on Business & Human Rights. These were identified through a risk assessment based on our list of suppliers, our expenditure and country of origin of the ingredients in 2019 and 2021, and a 2022 review of risk profile. See later sections (operations and responsible sourcing) for our management of these risks.

Notably, we have identified several commodities as high risk for their potential to impact both people and the environment. This includes coffee, cocoa, rice powder and fish oil used as ingredients in our products. We also understand that our use of temporary workers via labour hire is an area of inherent risk.

Risks	Activity	Potential impacts	Risk Detail (Actions to mitigate risks are outlined in next section)
Potential risks caused by Bega	Temporary and seasonal workers.	Underpayment of wages, debt bondage, deceptive recruitment.	We employ additional workers during peak harvest and processing seasons hired through labour hire agencies. These are addressed in the operational risk section of this Statement.
Potential risks contributed to by Bega	Higher risk commodity ingredients.	Debt bondage, servitude, deceptive recruitment trafficking, child labour.	<p>These higher risk ingredients include fish oils, alginates, carrageenan, coffee, cocoa, almonds, rice powder, cashews, sugar, salt, fruit and processed fruit, imported citrus, vanilla, coconut, corn-derived sweeteners and palm oil.</p> <p>These risks are present due to both geographic and commodity-based risk, with farming and harvesting often requiring base-skill labour and opaque supply chains making traceability difficult.</p>
Potential risks linked to Bega	<p>Merchandising and licensing relationships.</p> <p>Ingredients and manufacture in high-risk countries.</p> <p>Personal Protective Equipment and related COVID-19 risks.</p> <p>Goods not for resale.</p>	<p>Forced labour, underpayment of wages.</p> <p>Forced labour, trafficking, debt bondage.</p> <p>Worker health & safety, supply chain pressure.</p> <p>Forced labour, trafficking, debt bondage.</p>	<p>We have several commercial relationships with other companies related to merchandising and the licensing of some of our products and brands. Manufacturing can be a high risk industry, and contract manufacturing can be present risk as it involves third parties.</p> <p>We source from countries such as Brazil, Chile, India, Malaysia, Thailand, Indonesia and China which have increasingly high inherent risk due to forced labour risk.</p> <p>We recognise that COVID-19 has heightened modern slavery and broader human rights risks, particularly across high demand items such as Personal Protective Equipment. COVID-19 has also limited capability to conduct supplier audits in a range of ways.</p> <p>This includes our textile uniforms, pallets, capital machinery, and IT equipment all carry risks in manufacturing stages of supply.</p>

Figure 8: Key risks identified.

Our Approach: Greater Good

Our company values of grow our people, passion for the customer, invest in our future, and support each other, highlight the actions and behaviours we expect of our employees as representatives of our business. We strive to maintain the highest standards of employee conduct and ethical behaviour as we operate and manage our supply chain.



Our priorities are aligned with the UN Sustainable Development Goals

Figure 9: Greater Good and alignment with the UN Sustainable Development Goals.

Governance Framework

The Modern Slavery Working Group (MSWG) reports on progress to the Audit and Risk Committee and the full Board.

The MSWG consists of a cross functional group of managers with responsibility for Bega's operations and supply chain.

The MSWG's role is to:

- develop, review and implement our Modern Slavery Action Plan, which includes actions to monitor our own operations and supplier risks of modern slavery and the related performance.
- review relevant labour rights and modern slavery regulations in the jurisdictions in which Bega operates.
- review and assess policies and industry trends for modern slavery.
- monitor and contribute to the Bega Modern Slavery Statement.

The MSWG's purpose is to reduce the risks and strengthen our response to modern slavery by implementing robust processes to identify and address risks of modern slavery.

Modern slavery risk to people is reviewed by the MSWG as new risks are raised. This Group involves representation of the Audit and Risk Committee and would further escalate to Board as deemed necessary. Business risks related to modern slavery identified by the MSWG are managed and reported to the Audit and Risk Committee. The Audit and Risk Committee comprises of a subset of Board directors, and their summary is reported back to the Board. The Audit and Risk Committee monitors and reviews our risk register annually at a minimum, to assess the degree to which material risks are being effectively managed, and to ensure that they are adequately reflected in the material financial and compliance risks in our financial statements

Our Board, as of 30 June 2022, comprised of seven directors. Directors, and their other current directorships, are listed on pages 36 and 37 of our FY2022 Annual Report¹².



Figure 10: Governance diagram.

[12 READ MORE](#)

BEGA ANNUAL REPORT 2022

Our Policies

Our commitment to reducing the risk of modern slavery is operationalised through a range of policies and procedures. We are committed to operating in an objective and transparent manner that satisfies all of our legal and regulatory requirements and our corporate and social responsibility commitments.

Updates to our policy frameworks in FY2022

Our Ethical Sourcing Policy was updated in May 2022 to bring together the responsible and ethical sourcing approaches of Bega Cheese and Bega Dairy and Drinks, each of which had their own policies and procedures prior to acquisition in FY2021. Informed by relevant international agreements, the revised Policy has been updated to reflect our use of the Supplier Ethical Data Exchange (SEDEX), our expectations of suppliers regarding their participation in SEDEX and provisions for employees and suppliers to raise potential compliance issues.

Our Responsible Sourcing Code, which was developed this year and will be rolled out next year, then provides greater detail of our supplier sustainability and responsibility aspirations and the minimum standards we expect of suppliers, including those related to modern slavery and human rights.

We will continue to explore opportunities to frame our modern slavery approach in a broader approach to human rights.

Policy	Intent & relevance to modern slavery
<u>Code of Conduct</u>	Updated in FY2021, our Code of Conduct provides a framework of principles that Bega Group will abide by in business and dealing with stakeholders. Our Code of Conduct requires employees to act in an ethical manner and display the highest levels of professionalism across all aspects of their work.
<u>Quality</u>	Bega's Quality Policy outlines how we will achieve our commitment to supplying quality, safe and consistent products that meet the expectations of our customers and consumers and comply with legal requirements. This policy applies to all Bega manufacturing sites, and we expect third party manufacturers producing products on our behalf to apply the same principles.
<u>Environment and Sustainability</u>	Our Environment and Sustainability Policy outlines how we will action our commitment to ensuring our business continues to develop sustainably and reduce our impact on the natural environment and ensure positive social impact.
<u>Ethical Sourcing</u>	Our Ethical Sourcing Policy is aligned with our commitment to the United Nations Sustainable Development Goals. The aim is to protect the labour and human rights of workers across our supply chain and is informed by the Ten Principles of the United Nations Global Compact and the International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work.
<u>Compliance & Integrity</u>	Our Standards of Business Integrity sets out our commitment to integrity and operating at the highest standards of business conducts and ethics. This Standards documents outlines requirements suppliers must comply with at all times, including child labour and forced labour, working hours, safety and health, wage and benefits, non-discrimination, harassment and abuse, and disciplinary practices.
<u>Sustainable Palm Oil Sourcing</u>	Our Sustainable Palm Oil Sourcing Policy commits to sourcing palm oil in a socially and environmentally responsible manner, adopting the Roundtable on Sustainable Palm Oil as our standard for palm oil. Bega commits to sourcing palm oil and palm oil products from a transparent and sustainable supply chain respects and upholds the rights of workers, indigenous peoples, and local communities among other social and environmental considerations.
<u>Chain of responsibility</u>	Our Chain of Responsibility Policy outlines the actions Bega takes to comply with the Chain of Responsibility legislation and Heavy Vehicle National Law (HVNL) to protect employees, contractors, and communities.
<u>Health & Safety Policy</u>	This policy applies to all Bega manufacturing and network logistics sites and commercial offices in Australia, and also includes our sales and field support personnel working domestically or overseas, and all other locations where Bega has management control. It sets out our commitment to providing a healthy and safe workplace for all employees, contractors and visitors.
<u>Whistleblower Policy</u>	Our Whistleblower Policy aims to encourage the reporting of wrongdoing that may cause loss to Bega or damage to Bega's reputation, or may cause harm to others. The Whistleblower Policy establishes effective reporting and investigation mechanisms within Bega to enable the organisation to effectively deal with reports from Disclosing Persons in a way that will protect the identity of the Disclosing Persons and provide for the security of the information provided. The Whistleblower Policy notifies Disclosing Persons of the protection they are entitled to under the Corporations Act 2001 and this Policy in respect of Reportable Conduct.
<u>Diversity and Inclusion Policy</u>	Our Diversity and Inclusion Policy aims to ensure that our employees are treated fairly and equally. We recognise that a workforce that reflects our customers and global markets helps us understand changing consumer needs and builds an innovative and externally connected culture. We are committed to ensuring our business practices, systems and processes do not prevent people from diverse backgrounds having equality of opportunity within the business.
<u>Anti Fraud and Corruption Policy</u>	Our Anti Fraud and Corruption Policy provides guidance regarding Bega's position on fraud and corruption. This policy is part of our commitment to operate ethically, responsibly and with moral integrity. This Policy underpins any international business activity and financial transactions we perform.

Figure 11: Corporate and social responsibility commitments

Controls in our Operations

Bega recognises that strong labour and human rights protections are safeguards to prevent modern slavery. Our Code of Conduct outlines the requirements of staff to ensure suppliers are meeting their obligations to abide by laws and Bega policies. The Code of Conduct includes information on using the independent, confidential grievance hotline.

We have a range of controls and mitigation activities in place in relation to workforce compliance in our direct and indirect workforce. These support mitigation of modern slavery risk. Relevant controls and actions include:

- Approximately 57% of our staff in our manufacturing and logistics sites operate under collective bargaining agreements.
- We provide training for team members covering company policies and procedures, including our code of conduct, whistleblower policy, workplace behaviours and grievance procedures.
- Employees complete a Code of Conduct Declaration upon employment and take part in refresher training every 12 months to ensure awareness of any changes.
- We conduct independent audits (Sedex) to verify compliance.
- We have a dedicated human resources team to ensure compliance with all labour, employment, immigration and whistleblower protections under applicable legislation including the Corporations Act 2001 (Cth) and the Fair Work Act 2009 (Cth).
- We conduct an internal audit program to assure the effectiveness of our risk control framework and compliance with our policies.
- We support freedom of association and ensure our workers are free to join unions and participate in union activities, this is outlined in our Code of Conduct.
- Our approach to recruitment is "inside first", however when hiring externally, the organisation only uses reputable employment agencies to source workers and always verifies the practices of any new agency it uses before accepting workers from that agency. This functions to mitigate the risk of exploitative practices such as deceptive recruitment or debt bondage.
- When using a contingent labour hire company we verify accreditation levels. This also includes insurances, work cover and a detailed assessment of business history, financial performance, competency and references. Labour hire providers are also required to join the Sedex platform and undertake independent audits.

We have a dedicated human resources team to ensure compliance with all labour, employment, immigration and whistleblower protections

We support freedom of association and ensure our workers are free to join unions and participate in union activities

We provide training for team members covering company policies and procedures

Our Responsible Sourcing Program

Our due diligence process for engaging suppliers is initiated prior to awarding contracts and continues through to annual performance reviews. Our Ethical Sourcing Manager conducts the assessment of new suppliers and reviews existing suppliers.

Our approach is outlined in Figure 12. As active members of SEDEX we require suppliers to share their data and we review their responses against an internationally recognised audit and compliance program. Our suppliers must also complete an annual ethical sourcing self-assessment questionnaire (SAQ) and Bega may require an independent compliance audit of the supplier, particularly those considered to be high risk.

This year, 211 of our medium to high-risk suppliers completed the SAQ and 100% of high-risk suppliers have completed an independent compliance audit using SMETA (Sedex Members Ethical Trade Audit). Only one business critical non-conformance was found and it was resolved. Another 1 critical, 8 major and 4 minor non-conformances were recorded with a resolution rate of 100%, 100% and 100% respectively this year. All of our 22 new suppliers in FY2022 were screened using the SAQ and 8 of the new suppliers deemed to be medium to high-risk completed an audit.

As part of our participation in SEDEX, we also undergo third party SMETA audits of our own manufacturing sites which, in turn, provides assurance to our major customers. This year we have completed audits for our sites at: Malanda, Kingaroy, Koroit, Bentley, Lagoon Street, Ridge Street, Salisbury, Lenah Valley and Strathmerton. An audit of the Vegemite Way and Tatura sites is scheduled for FY2023.

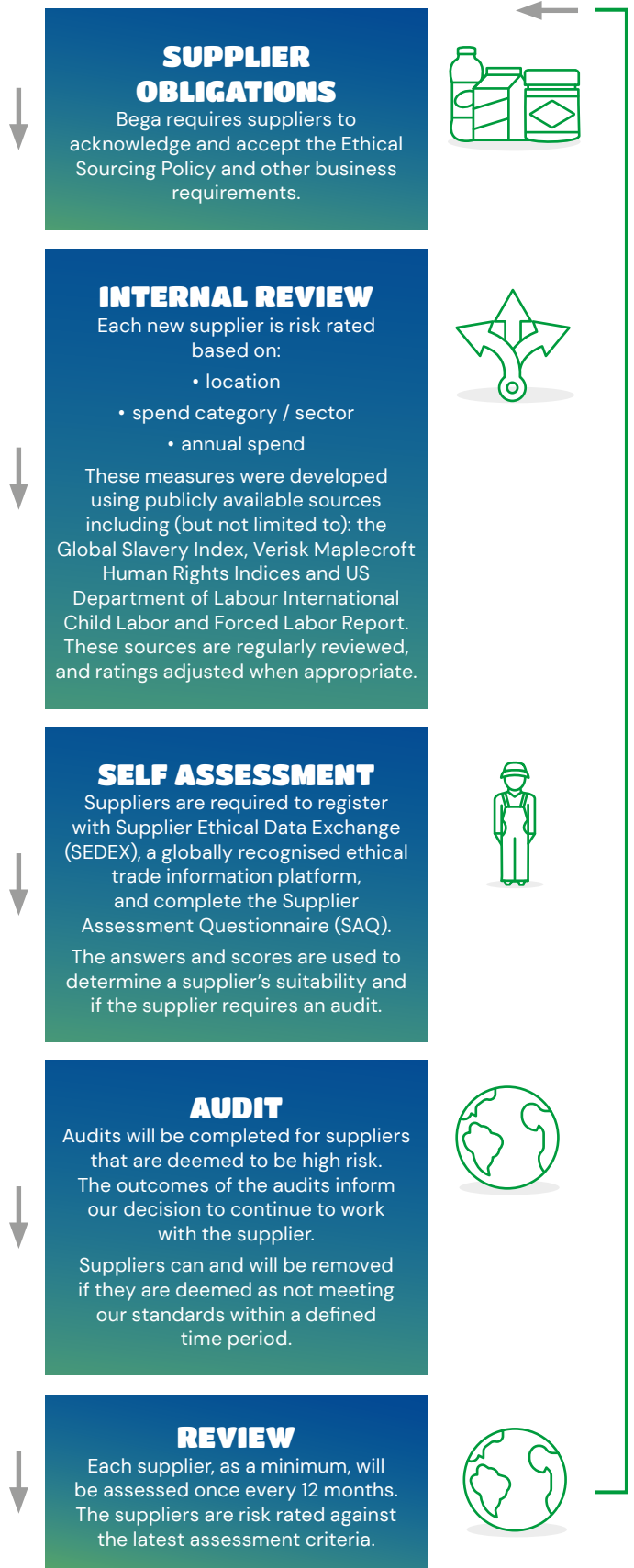


Figure 12: Bega Group ethical sourcing program.

Dare Iced Coffee uses coffee from Rainforest Alliance Certified farms

100%

of new suppliers were screened using our ethical sourcing questionnaire

100%

of high-risk suppliers have completed an independent compliance audit

More than

97%

of palm oil sourced by Bega Group in FY2022 was certified as Segregated under RSPO

We have 9 completed Audits in FY2022. There were 29 Non-Conformances in which all resolved within a 90-day period. The independent audits also found 21 good examples.

Better Farms Program

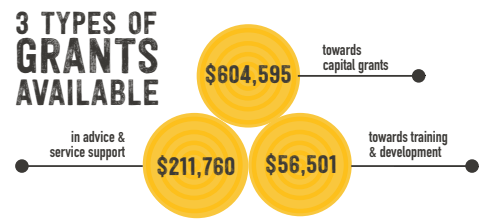
We support dairy farmers through our Better Farms Program which helps farmers develop and improve their business through grants for capital works, service support and development and training. As part of the capital works grant, our farm Service Field Officers complete a checklist with the farmer to ensure all compliance areas are met before proceeding with funding of grants of projects that are not compliance related. Animal welfare is also a major focus of the Better Farms Program, these grants help our farmers improve their practices and levels of compliance. Our grants have been used by farmers to better workplace health and safety, improve waste and water management practices, support people and support animal health and welfare.

More than 45% of grants to dairy farmers under our Better Farms program have been devoted to capital works projects, training and advice on improving animal welfare and calf management outcomes. Bega's Better Farms Program provides financial grants to eligible dairy farmers who have milk supply agreements with Bega Group or other Program participants. See www.betterfarms.com.au for more information.

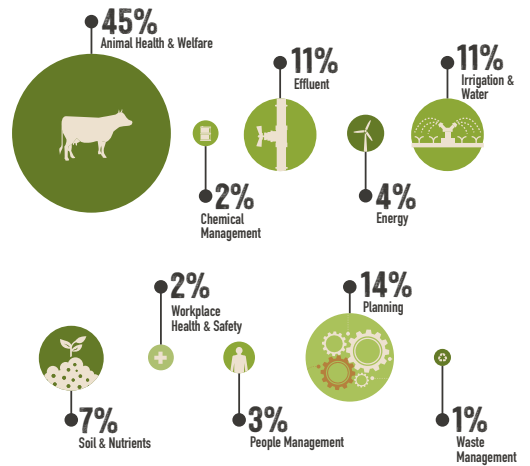
Better Farms complements our existing contractual agreements with dairy farmers which reflect the Dairy Industry Code of Conduct. Our supply agreements are publicly available and include commitments to health and safety for staff and contractors, as well as reference to grievance and dispute mechanisms.



Figure 13: Summary of Better Farms grants expenditure April 2018 to 30 June 2022



OUR FARMERS HAVE USED THEIR GRANTS TOWARDS:



READ MORE

BEGA'S FARM MILK SUPPLY AGREEMENTS

High Risk Commodities

We have identified several commodities as high risk for their potential to impact people and the environment. This includes coffee, cocoa, rice powder and fish oil used as ingredients in our products. These were identified through a risk assessment based on our list of suppliers, our expenditure and country of origin of the ingredients. We have commenced further and specific due diligence work with these suppliers. This year we worked with the Rainforest Alliance to procure coffee for specific manufacturing sites now independently certified to the Rainforest Alliance 2020 Sustainable Agriculture Standard.

We recognise that palm oil presents risks of modern slavery due to the presence of labour exploitation. Bega Cheese has been an associate member of the Roundtable on Sustainable Palm Oil (RSPO) since December 2019 and adopted a Sustainable Palm Oil Sourcing Policy in 2020. Our manufacturing sites at Ridge Street, Bega and Strathmerton have maintained RSPO Supply Chain Certification (SCC). Bega Dairy and Drinks also adopted a palm oil policy in 2020 limiting palm oil or its derivatives to less than 1.5% of Bega Dairy and Drinks products. The policy commits Bega Dairy and Drinks to 100% RSPO certified sustainable palm oil according to the Mass Balance model as a minimum. A reconciled and whole of Bega Group palm oil policy is to be developed. This year more than 97% of palm oil sourced was RSPO certified Segregated. Labour and human rights have been part of the RSPO standards since its inception.



Case Study

COFFEE CERTIFICATION

Through a risk assessment of our supply chain, we identified several commodities as high risk for their potential to impact people and the environment, including coffee. We are working with the Rainforest Alliance to procure coffee independently certified to the Rainforest Alliance 2020 Sustainable Agriculture Standard. Rainforest Alliance Certified coffee means contributing to lifting rural people out of poverty by improving sustainable livelihood opportunities for farmers, workers, and their families in addition to addressing human rights abuses like child and forced labour, low wages, poor working conditions, and gender inequality. All of our sites making Dare Iced Coffee were independently certified under the Supply Chain Standard this year, sourcing and processing coffee from Rainforest Alliance Certified Farms.

**4 STAR HEALTH
STAR RATING**



[READ MORE](#)

**RAINFOREST
ALLIANCE**



Grievance Mechanisms & Remediation

Grievance mechanisms

Our confidential whistleblower program is available to all of our people (and their families) as well as contractors/ suppliers (and their workers). The program allows concerned parties to bring allegations of inappropriate behaviour and other issues to the attention of the Executive Team. Reports received through the whistleblower scheme can be on any topic where there is suspected or actual illegal activity, or to report breaches of Company Policy, including our Code of Conduct and Compliance and Integrity Policy. The Code of Conduct also acknowledges that a person making a complaint may seek an external resolution at any time during the process. This may involve lodging a complaint with Fair Work Australia, WorkSafe, or the Human Rights and Equal Opportunity Commission. We ensure that the confidential whistleblower program is accessible by communicating through physical posters, and training that is conducted annually. We undertook efforts during 2022 to communicate the whistleblower program through training, materials such as posters, website content and inclusion in the on-boarding process. During 2023 we will work to review our grievance mechanisms and extend them to the entire supply chain.

Employees and third parties can confidentially access the externally operated whistleblower system by phone or email. Each whistleblower report is investigated and communicated to the Executive Team. Each instance and the outcomes of whistleblower investigations are also reported to the Board.

During the financial year, there were no reports of modern slavery received through the confidential whistleblower program.

Remediation

Whilst we seek to address and resolve non-conformance findings through our supplier and site audit program, we have not yet outlined an approach to remedy in our policies and procedures. During FY2023 we will work toward ensuring our commitment and expectations are clearly articulated in our policy frameworks and understood by suppliers.

As mentioned above we actively manage non conformance within our responsible sourcing program.



Stakeholder Engagement and Collaboration

As part of our consultation process we seek feedback and perspectives from a broad mix of internal and external stakeholders. Integrating different perspectives, having up-to-date information and working collaboratively across the supply chain are key to developing and improving our approach.

Initiative	Our Engagement
SEDEX ¹³	We are an A/B member of SEDEX, one of the world’s leading ethical trade data platforms, focused on improving the monitoring of working conditions in global supply chains. We use SEDEX risk ratings, SAQ and audit methodologies to inform our ethical sourcing approach. During the reporting period we engaged 22 new suppliers, in addition to over 200 active relationships in Sedex.
Australian Dairy Sustainability Framework (ADSF) ¹⁴	We are an active member of the Steering Committee for ADSF. ADSF has committed to ensuring all sectors of the dairy industry fulfil their responsibilities consistent with the United Nations Guiding Principles on Business and Human Rights. The ADSF has identified human rights as a material topic for the dairy industry in its 2020 materiality review. This has informed our own sustainability reporting.
Roundtable on Responsible Palm Oil ¹⁵	In FY2020 we became associate members of the Roundtable on Sustainable Palm Oil (RSPO), a not-for-profit organisation that develops and implements global standards for sustainable palm oil to help minimise the negative impact of palm oil cultivation on the environment and communities in palm oil producing regions. Although not required as an associate member, we will submit an annual Communication of Progress to the RSPO to identify our progress towards 100% RSPO-certified sustainable palm oil.
Peanut Growers Advisory Group	Our Peanut Grower Advisory Group includes grower representation from each of our major regions, helping us maintain two-way communication and build sustainable long-term relationships with peanut growers. During the reporting year we engaged with this group.
Dairy Industry Human Rights Collaboration	Bega is actively participating in the Australian Dairy Sustainability Framework’s Human Rights Working Group (see case study).

Figure 14: Stakeholder engagement and collaboration.



HUMAN RIGHTS COLLABORATION IN THE DAIRY INDUSTRY

Bega's work in human rights is supported by the Australian Dairy Sustainability Framework. In 2019, the Australian Dairy Industry Council agreed a national position on human rights which committed the dairy industry to building a profitable and sustainable future. It commits all sectors of the dairy industry to act responsibly, respecting internationally recognised human rights as set out in the Universal Declaration of Human Rights and related core international standards. In addition, all sectors of the dairy industry should fulfil their responsibilities consistent with the UN Guiding Principles on Business and Human Rights – the internationally recognised global standard for preventing and addressing business-related human rights harm. The Australian Dairy Industry Council recommended that all sectors of the dairy industry put policies and processes in place proportionate and reasonable to their size, to ensure they can fulfil their responsibility to respect human rights and work towards continuous improvement.

Bega is actively participating in the Australian Dairy Sustainability Framework's Human Rights Working Group which is conducting a review of the dairy supply chain to identify and assess human rights risks. A third party has been commissioned to support this work and to provide an independent assessment of the potential human rights risks in the Australian dairy industry. The Working Group includes representation from the Australian Dairy Products Federation, Australian Dairy Farmers, Dairy Australia and dairy companies. It will also develop action plans to address risks, showcase best practices by dairy businesses and track industry performance against the national commitments. Bega Group's ongoing approach to human rights will be informed by this work.



**Australian Dairy
Sustainability
Framework**

Assessing the Effectiveness of our Actions

Our approach

We regularly review our approach to addressing modern slavery to ensure the ongoing effectiveness of our actions. Effectiveness is assessed by asking whether our actions are effective in addressing the modern slavery risks that our business may cause, contribute, or be directly linked to in alignment with the UNGPs. Ultimately, we assess the effectiveness of our actions with the aim that human rights are respected across our own operations and supply chain.

We recognise that achieving an effective approach to modern slavery is complex, difficult to measure and requires continuous improvement. As such we take a qualitative and quantitative approach to assessing effectiveness.

Key actions to monitor and improve the effectiveness of our work include:

- We track our progress against our Modern Slavery Action Plan quarterly, and review the actions to monitor their ongoing effectiveness.
- The table on this page shows some of the metrics we track as part of our overall management of effectiveness. These quantitative outputs represent progress towards our objectives.
- We also recognise the importance of reflection, review and qualitative analysis to assess effectiveness of our actions. In the future we will explore additional outcomes-based metrics to improve the assessment of the effectiveness of our actions, such as assessing a measurable increase in workers' awareness of modern slavery after training.
- We conduct internal reflection and seek external expert guidance to evaluate whether our approaches align with established guidance and emerging good practice and are fit for purpose.
- The modern slavery risks identified during our FY2021 review have been assessed using AS/NZS ISO 31000:2009. From the assessment, we have developed actions to continuously improve and mitigate risks where needed during FY2022.
- We review our policies annually to ensure their continued effectiveness and alignment to best practice.
- We use a 'saliency' approach to consider which risks to people are the most severe; this supports effectiveness by facilitating prioritisation based on risk to people.
- Our internal audit team reviewed the identified potential modern slavery risks based on Bega internal policies. The process included considering the Bega risk approach as applied to key salient risks previously identified.

Indicator	Metric
Training	The percentage completion rate of employees finishing their annual mandatory refresher compliance training. The topics include the Code of Conduct, ethical behaviour, modern slavery, anti-bribery and anti-corruption, as well as health and safety standards.
Supplier risk	The percentage of suppliers identified as having high or medium inherent risk of modern slavery practices and the percentage of the high or medium inherent risk suppliers that have registered on SEDEX.
Third party social compliance audits	The number of high-risk suppliers that have been audited with open non-conformances, as a percentage of total high-risk suppliers.

Figure 15: Management effectiveness metrics.



Progress in FY2022 against Objectives

Area	FY2022 Actions	Status
Updated Ethical Sourcing Policy	Our Ethical Sourcing Policy was updated in May 2022 to guide our sourcing decisions. The updated Policy combines Bega Cheese and Bega Dairy and Drinks approaches to ethical sourcing and reflects our use of SEDEX.	Completed
Developed Supplier Responsible Sourcing Code	<p>We developed our Supplier Responsible Sourcing Code to support our Ethical Sourcing Policy, providing additional detail on requirements to meet our ethical sourcing standards. It sets out our expectations of suppliers (and their subsidiaries and sub-contractors) regarding key issues, including human rights, business integrity and ethical standards, health and safety, and environmental impacts. It requires all work to be freely chosen and completed without the use of forced or compulsory labour. In addition, it requires that all workers be of local legal age and prohibit the use of child labour.</p> <p>The Supplier Responsible Sourcing Code was presented to our Modern Slavery Working Group in August 2022 and will be rolled out in the upcoming financial year. It will be made available on our website, provided to prospective suppliers and regularly referenced in discussions with existing suppliers.</p>	Completed, to be rolled out in FY2023
Rainforest Alliance certification for coffee	All of our sites making Dare Iced Coffee were independently certified under the Rainforest Alliance 2020 Sustainable Agriculture Standard this year, sourcing coffee from Rainforest Alliance Certified Farms. For more information, see case study on page 28.	Completed
Completion of SMETA audits	As part of our participation in SEDEX, we also undergo third party SMETA audits of our own manufacturing sites which, in turn, provides assurance to our major customers. This year we have completed audits for our sites at: Malanda, Kingaroy, Koroit, Bentley, Lagoon Street, Ridge Street, Salisbury, Lenah Valley and Strathmerton. An audit of the Vegemite Way and Tatura sites is scheduled for FY2023.	In progress
High risk tier 2 and beyond	We are further investigating cashews and fish oil sources, based on the 2020 Modern Slavery Action Plan. We are working with suppliers to better understand the supply chains.	In progress
Additional contractual requirements	We have added clauses to our supplier agreements to improve transparency, set expectations and register with SEDEX if requested. We will continue to update and improve clauses as we introduce the Responsible Sourcing Code.	In progress
Modern slavery action plan and road map	The action plan and road map developed by our Modern Slavery Working Group in 2020 continue to guide our modern slavery risk management actions, with a continuous improvement approach.	In progress
SEDEX requirements	We achieved 92% of all high/medium risk suppliers registered on SEDEX during the reporting period.	In progress
Training	A training module was developed and approved by the Modern Slavery Working Group in FY2022, it will be rolled out in Q2 FY2023.	In progress

Figure 16: Progress in FY2022 against objectives.

Future Priorities

We are committed to continuously improving the ethical standards within our operations and our supply chain. In FY2023, we plan to:

Initiative	Our Actions
Implementation of Supplier Responsible Sourcing Code	We will implement our Supplier Responsible Sourcing Code, developed in FY2022 and detailed on page 22. It will be integrated into the contract process, with relevant policies and clauses being updated.
Continuous integration of high and medium risk suppliers signing up to Sedex	We will continually engage with our suppliers regarding our Ethical Sourcing Policy and Supplier Responsible Sourcing code. This involves an internal risk assessment assessing spend, industry and country of operation. Any supplier deemed high and medium risk in our supply chain will need to become a member of Sedex, complete the SAQ and conduct independent audits.
Ethical Sourcing Training	A new ethical sourcing training module has been developed and approved by the Modern Slavery Working Group. The module will be rolled out in Q2 of FY2023 and will be completed by key internal employees. Completion of the training will be monitored.
Implement a continuous improvement approach	The Modern Slavery Action Plan and road map, developed by our working group in 2020, continues to guide our modern slavery risk management actions. We will update the road map in FY2023, with a view to update it annually thereafter. We will also aim to ensure a continuous improvement approach by reviewing and updating relevant policies and continuing to monitor our processes internally.
Analyse high and medium risk commodities and suppliers	We will continue to monitor and assess suppliers for modern slavery risk and aim to conduct audits for all suppliers in our supply chain to assess the risk level. For suppliers of high-risk commodities, we will focus on traceability, appropriate use of certifications and standards, and further due diligence and targeted investigation and audit where recognised certifications are not available. We will also consider other areas such as cleaning and business merchandise.
Dairy Industry Human Rights Collaboration	We are a member of the Dairy Industry Human Rights Collaboration Working Group, chaired by Dairy Australia. Other members include the Australian Dairy Products Federation, dairy processors and consultants. In FY2023 Dairy Australia will produce a risk report for the Australian Dairy Industry through the supply chain, with a specific focus on human rights risks at farm level and an assessment of the controls the sector has in place to address them. This work will then be used to inform our ongoing approach with Bega's farmer suppliers.
Increased review and management of operational risks	We will undertake further work on understanding and addressing risks in the indirect workforce, notably such as those related to labour hire/ seasonal workers.
Review of grievance mechanisms and remediation	We will review our grievance mechanisms for alignment to UN guidance (UNGPs) and coverage across our supply chain and undertake to develop an approach to remediation.
Develop policy frameworks	We will undertake to develop a human rights policy, and consider conducting broad human rights salience assessment to inform our priorities.

Figure 17: Future priorities.

The Process of Consultation with Entities Owned and/or Controlled

In order to develop this joint statement, we consulted and engaged within Bega Cheese Limited and with the companies we own and control as relevant to frame expectations, gain relevant information for inclusion and to verify and confirm the data included.

All controlled subsidiaries within Bega Cheese Limited are covered by the same company policies, procedures, and systems, including those relating to supply chain management, ethical sourcing, employment, and human resource management. Bega applies common standards for the management of modern slavery risk across the whole of Bega Cheese Limited.

This statement has been reviewed by the Executive Team and the Board of Directors.

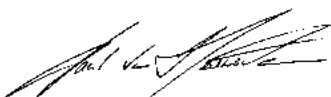
Statement approval

This Modern Slavery Statement is approved by Barry Irvin, Executive Chairman, and Paul van Heerwaarden, Chief Executive Officer as representatives of the Board of Bega Cheese Limited, as the parent entity for Bega Group on 20 December 2022.

Barry Irvin Executive Chairman

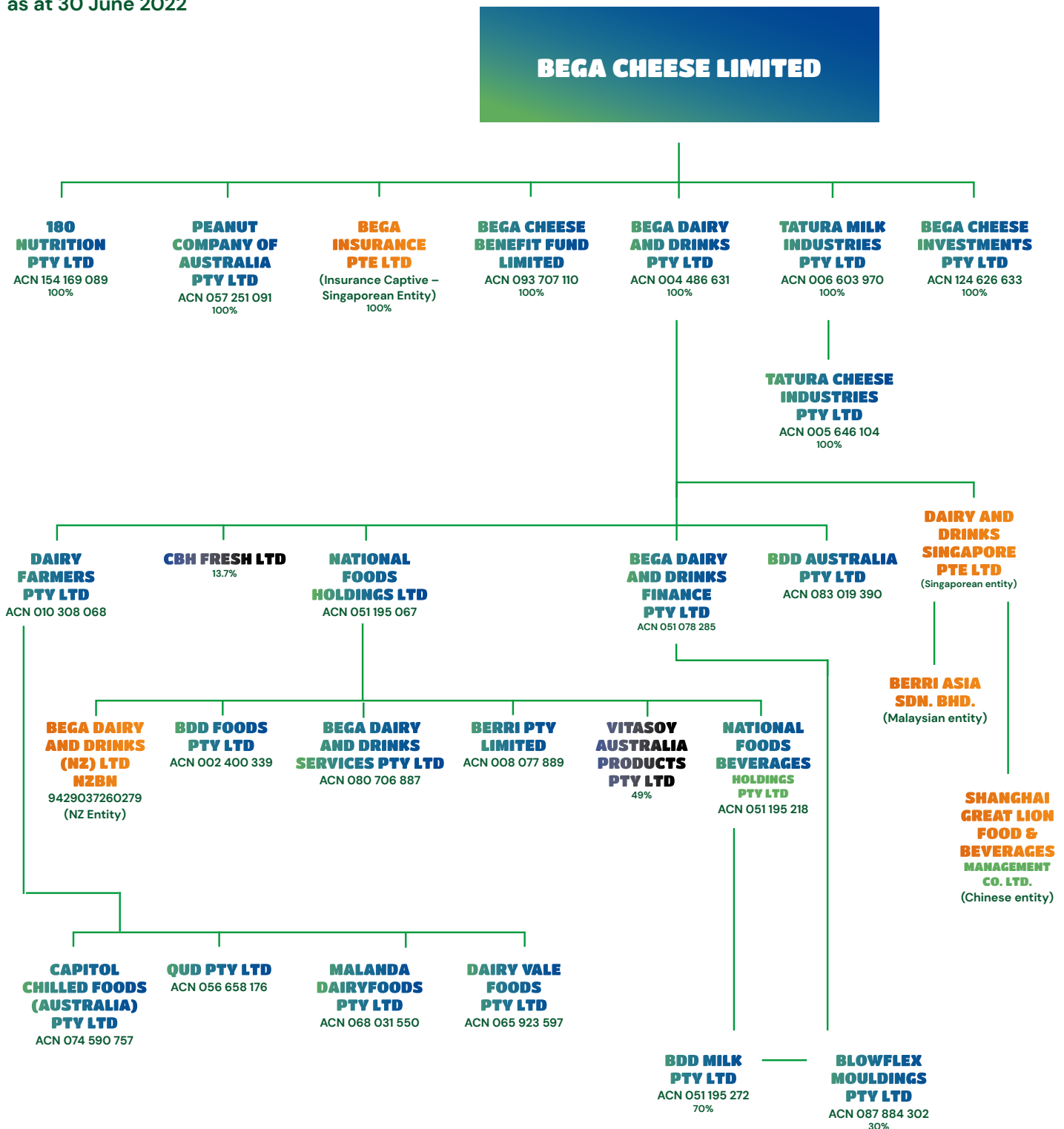


Paul van Heerwaarden Chief Executive Officer



Appendix 1: Bega Group Structure

as at 30 June 2022



WHOLLY-OWNED MEMBERS OF THE AUSTRALIAN GROUP

INTERNATIONAL ENTITIES

JOINT VENTURE

Figure 18: Bega Group entity structure.

Appendix 2: Entities Part of this Joint Statement

This Modern Slavery Statement has been prepared as a joint statement on behalf of the following reporting entities: Bega Cheese Limited ABN 81 008 358 503.

Business Entity		Type	Period
Tatura Milk Industries Pty Ltd	ACN 006 603 970	Ownership 100%	Reporting Period
Tatura Cheese Industries Pty Ltd	ACN 005 646 104	Ownership 100%	Reporting Period
180 Nutrition Pty Ltd	ACN 154 169 089	Ownership 100%	01 Nov–30 Jun
Peanut Company of Australia Pty Ltd	ACN 057 251 091	Ownership 100%	Reporting Period
Bega Cheese Benefit Fund Limited	ACN 093 707 110	Ownership 100%	Reporting Period
Bega Cheese Investments Pty Ltd	ACN 124 626 633	Ownership 100%	Reporting Period
Bega Dairy and Drinks Pty Ltd	ACN 004 486 631	Ownership 100%	25 Jan–30 Jun
Dairy Farmers Pty Ltd	ACN 010 308 068	Ownership 100%	25 Jan–30 Jun
National Foods Holdings Limited	ACN 051 195 067	Ownership 100%	25 Jan–30 Jun
BDD Australia Pty Ltd	ACN 083 019 390	Ownership 100%	25 Jan–30 Jun
Bega Dairy and Drinks Finance Pty Ltd	ACN 051 078 285	Ownership 100%	25 Jan–30 Jun
BDD Foods Pty Ltd	ACN 002 400 339	Ownership 100%	25 Jan–30 Jun
Bega Dairy and Drinks Services Pty Ltd	ACN 080 706 887	Ownership 100%	25 Jan–30 Jun
Berri Pty Limited	ACN 008 077 889	Ownership 100%	25 Jan–30 Jun
National Foods Beverages Holdings Pty Ltd	ACN 051 195 218	Ownership 100%	25 Jan–30 Jun
Capitol Chilled Foods (Australia) Pty. Ltd	ACN 074 590 757	Ownership 100%	25 Jan–30 Jun
QUD Pty Ltd	ACN 056 658 176	Ownership 100%	25 Jan–30 Jun
Malanda Dairyfoods Pty Ltd	ACN 068 031 550	Ownership 100%	25 Jan–30 Jun
Dairy Vale Foods Pty Ltd	ACN 065 923 597	Ownership 100%	25 Jan–30 Jun
BDD Milk Pty Ltd	ACN 051 195 272	Ownership 100%	25 Jan–30 Jun
Blowflex Mouldings Pty Ltd	ACN 087 884 302	Ownership 100%	25 Jan–30 Jun
Bega Dairy and Drinks (NZ) Ltd	NZBN 9429037260279	International entity	25 Jan–30 Jun
Dairy and Drinks Singapore Pte Ltd (Singaporean entity)		International entity	25 Jan–30 Jun
Berri Asia Sdn. Bhd. (Malaysian entity)		International entity	25 Jan–30 Jun
Shanghai Great Lion Food & Beverages Management Co. Ltd. (Chinese entity)		International entity	25 Jan–30 Jun

Figure 19: Entities part of this joint statement.

Appendix 3: Compliance with the Mandatory Criteria

We are committed to continuously improving the ethical standards within our operations and our supply chain. In FY2023, we plan to:

Mandatory Reporting Criterion	Reference in this statement
Identify the reporting entity.	Section 1. Introduction Section 2. Company overview Appendix A.
Describe the reporting entity's structure, operations, and supply chains.	Section 2: Company overview.
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Section 3: Our modern slavery risks.
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.	Section 4: Our approach.
Describe how the reporting entity assesses the effectiveness of such actions.	Section 5: Assessing the effectiveness of our actions.
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	Section 6: The process of consultation with entities owned and/or controlled.
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Future priorities (within Section 6).

Figure 20: Compliance with the mandatory criteria.



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*creating great food
for a better future*