



Modern Slavery Act Statement

Year Ended 31 December 2021

Introduction

This statement sets out the approach and actions of Dr Oetker Queen Australia Pty Ltd and its subsidiaries ("Company") to potential modern slavery risks in its daily operations and supply chain. The company recognises its important social role in industry and is fully committed to preventing slavery and human trafficking in its corporate activities.

Organisational Structure

This statement covers all activities of the Company, which is part of the Oetker Group, a large European family-owned company. Dr. Oetker Queen Australia Pty Ltd and its subsidiary Dr. Oetker New Zealand Ltd ("Company") operate under the management and single leadership team of Dr. Oetker Queen Australia Pty Ltd.

The Company is a frozen and ambient food manufacturer employing approximately 100 people across its three sites in Brisbane and Melbourne, Australia and Auckland, New Zealand.

Supply Chains

The Company procures raw materials, semi-finished products, packaging, finished goods and services from over 600 international and local suppliers. It is important to our customers, stakeholders, and our people, that we source our products in an ethical manner. Also ensuring our suppliers also source their products ethically and operate sustainable and profitable businesses.

Suppliers are critical to our business. We build long-term relationships with our suppliers including our international vanilla providers. This enables us to have open and honest discussions regarding their own procurement practices which often involves complex international supply chains.

Where possible we also source from local suppliers where we can and for international supply optimise our ordering practices to minimise environmental impact.

Risk with Company Supply Chain and Operations

The Company engages key suppliers on a frequent basis to conduct quality audits of operations, which includes local and international site visits. There are risks with some commodities such as vanilla and cocoa. These can be with supply partners that operate in developing countries who have less sophisticated operational management systems and involve complex downstream supply chains from harvesting raw materials to processing.

We work with our partners according to internationally established standards. These are based, among others, on the standards of the International Labor Organization (ILO) and include specifications regarding environmental protection, origin, and quality of the raw materials and products.

To manage further critical risks, where possible the company procures commodities that have strong sustainability programs such as Fair Trade Vanilla and Rainforest Alliance cocoa certification. These programs have a focus on both human rights and environmental due



diligence via dialogue with rightsholders, fair cost sharing, collaboration, and continuous improvement programs. These programs look to improve living wages and living incomes, protect against forced labour, discrimination, conditions of work and environmental rights.

Our goal is to always ensure our products contain ingredients produced under socially and environmentally responsible conditions. That is why we see great importance in also participating in local initiatives within vanilla producing regions.

The company has also established additional programs such as its own vanilla Plantations of Distinction (POD). Our Company POD program is a sustainable supply chain initiative in key vanilla growing regions on the ground in markets such as Uganda and Madagascar. The POD program focuses on traceability linking our vanilla to vanilla growers and their farms.

The Company is also a member of the Sustainable Vanilla Initiative (SVI). Launched in 2015 SVI is a voluntary industry vanilla initiative, which aims to promote the long-term stable supply of high-quality, natural vanilla, which is produced in a socially, environmentally, and economically sustainable way¹. SVI members believe vanilla can benefit all partners along the value chain, beginning with improving farmer livelihoods.

The SVI is hosted by IDH the Sustainable Trade Initiative, a non-government organisation in collaboration with US-based Sustainable Food Lab (SFL) and liaises with vanilla exporters, producers, sector organizations and public authorities worldwide to progress issues of governance, traceability, labor rights and technical assistance to grower groups².

The majority of the company's finished goods are processed and manufactured in company-owned premises in first world countries with well governed labour standards therefore any downstream risks are considered low.

Responsibility and Due Diligence

Overall responsibility for the organisations anti-slavery initiatives lies with the Managing Director and Procurement. The Managing Director, Executive Manager Supply Chain and HR are responsible for the statement creation and for ensuring that training of internal staff is conducted.

Other Relevant Policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in its operations.

- **Employee Code of Conduct:** The Oetker 'Code of Business Conduct' describes the basic requirements, which the organisation expects its employees to adhere to. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour not only internally but also when operating abroad and managing its supply chain.
- **Supplier Code of Conduct.** Our Oetker 'Supplier Code of Conduct', applies to all suppliers of the Company. In addition to strict compliance with the law, it requires that compliance with the core ILO labour standards is ensured, and that the environment is protected.



- **Recruitment/Agency Workers:** The organisation uses only specified, reputable employment agencies to recruit staff and verifies the practices of any new agency it is using before accepting workers from that agency. All permanent, part time and agency staff are covered by minimum fair working standards and award wages in Australia and New Zealand.
- **Australian Trusted Trader, Australian Border Force (ABF):** On 11 August 2021 Dr. Oetker Queen Australia Pty Ltd achieved full accreditation status as an Australian Trusted Trader by meeting the required standard of supply chain security and trade compliance, an arrangement under the Customs Amendment Act 2015. As a part of the international supply chain, the Company acknowledges that there is the potential for risk in our operations. In acknowledgement of these risks, the Company has implemented safeguards in line with our Australian Trusted Trader accreditation.

Awareness-raising program

Employee training sessions on Modern Slavery are conducted periodically refreshed as part of our compliance training program. In addition to training employees, the organisation raises awareness and keeps familiarity by a rotation of literature in offices and sites.

Induction Program

Information on Modern Slavery is provided by the Company during the Induction program.

Consultation Process

As noted in the organisational structure, the reporting entities operate under the management of a single leadership team, which has been consulted in the preparation and approval of this statement.

Maintaining Effectiveness and Continual Monitoring of Risk Mitigation

The Company is committed to periodically reviewing risk identification, code of conduct, communication, and awareness procedures at a Leadership team level. The Company, as part of a global group with activities in other countries with similar legislation will as necessary compare strategies to ensure compliance and best practice. The Company will use external advisers or auditors as deemed necessary.

This statement covers financial year 1st January 2021 to 31st December 2021. It has been approved by the Board of Directors on 14 November 2023 and signed by the Managing Director as the responsible member of the reporting entity.

Adam Hanlon
Managing Director