

The background is a dark blue gradient. In the top left corner, there are several bright red tomatoes on their green stems. In the top right corner, there are fresh green cilantro leaves. In the bottom right corner, there is a white bowl filled with red ketchup, with several garlic cloves scattered around it. The top of the page features a horizontal bar with five colored segments: purple, dark blue, teal, green, and red. In the bottom left corner, there is a faint, light blue circular graphic composed of several thick, curved segments.

Kraft*Heinz*

Joint Modern Slavery Statement

2023

Kraft Heinz Australia Pty Limited
H.J. Heinz Company Australia Limited
Golden Circle Limited
Cerebos (Australia) Limited
Salpak Pty Limited

INTRODUCTION

Message from ANJ President



I am proud to submit this statement detailing the activities and progressive achievements of our compliance program under the Australian Modern Slavery Act in 2023.

This is our fourth Modern Slavery Statement covering the operations and supply chain of the Kraft Heinz Australian companies. Building on the efforts of previous years, we have both broadened and deepened the scope of our compliance program. More specifically, we have:

- Undertaken independent ethical trade audits of all our factories in Australia and commenced a repeat audit cycle for both the Australian factories and Kraft Heinz's factories in New Zealand that supply products to Australia.
- Intensified our outreach to suppliers by launching a Supplier Partnership Programme with a significant human rights and modern slavery component.
- Conducted a thorough review of modern slavery risks in Tier 2 and Tier 3 of our tuna supply chain. This review focused on the fisheries and processing plants that supply our Greenseas branded tuna products.

We are committed to responsible, sustainable practices extending to each aspect of our business. The Company's ESG strategy prioritizes the issues that matter most to our business and stakeholders, focusing on areas that have the greatest impact. It includes three key pillars: Healthy Living & Community Support, Environmental Stewardship and Responsible Sourcing.

We pursue our vision through six core values, one of which is 'doing the right thing'. Combating modern slavery is a fundamental aspect of achieving this as a company. We are aware of the risk that people can be enslaved and exploited in any economic value chain. We work hard to address this risk.

We recognise that the fight against modern slavery is a continuing journey. Thus, this Modern Slavery Statement reflects what we achieved over the past year and but also details the progress we still need to make.

Jerome Drolet
ANJ President

Our vision is to sustainably grow by delighting more consumers globally.

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OUR VALUES

We dare to do better every day.

We are on a journey of continual improvement, constantly challenging the status quo. Our curiosity ensures we are constantly learning and working to be better than we were yesterday. Our commitment to efficiency enables us to courageously invest in our business and fast growth.



We are consumer obsessed.

We are a company of food lovers, and our brands hold a unique place in the hearts and homes of our consumers. We work every day to earn their loyalty and love. Our consumers are at the center of everything we do, and we are building a culture of creativity to anticipate and respond to their future needs, delivering appealing food across our brands.



We own it.

We are accountable. We act as owners each day, showing commitment and belief in our cause, making decisions and treating this business as if it were our own. We take responsibility for our actions and results, in the pursuit of building something together for bigger than ourselves.



We champion great people.

We are a meritocracy. Attracting, nurturing and developing talent is our top priority. Great people have the vision to see what must be done, and the courage to do it. As a company we are only as great as the quality of our teams. Our people make the difference.



We demand diversity.

We are inclusive. All are welcome. We will not just tolerate, but actively seek to bring different points of view, talents, backgrounds and perspectives into our organization. We are committed to creating a diverse and inclusive workplace.



We do the right thing.

We lead with honesty and integrity. We will always do right by our customers, partners, suppliers and the communities we serve. We actively care about our environment, creating high-quality, responsibly manufactured products.



OUR COMMITMENT

From our quality controls to the relationships we have with our growers and suppliers, we are committed to responsible business practices extending to every facet of our business. We continuously evaluate what we do in an effort to identify better and more sustainable ways to operate.

In support of our Vision, we are committed to respecting human rights in our own operations and throughout our global value chain. We believe the protection of human rights is fundamental to good business, and believe we have both the ability and responsibility to drive positive change through our global work. We are guided by internationally recognized standards, including the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the principles set forth in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Human Rights Guiding Principles

Kraft Heinz adheres to the following principles, and expects the same from its suppliers and other business partners:

- Minimum Age for Employment – we prohibit the employment of anyone under the legal working age as defined by local law and/or our human rights policy, whichever is higher. We do not tolerate the use of child labour
- Forced Labour – we do not tolerate the use of forced or involuntary prison labour
- Abuse and Harassment – we prohibit the use of corporal punishment or other forms of physical or sexual harassment or abuse
- Discrimination – we prohibit discrimination on the basis of inequalities including race, ethnicity, sex, language, religion, political or other opinion, national or social origin, property and birth or other legally-protected status (such as sexual orientation or health status)
- Freedom of Association – we recognize and respect the rights to freedom of association and collective bargaining
- Work Hours, Work Week and Payment of Wages – we provide fair and equitable wages and other employment conditions in accordance with applicable local laws and/or the principles of this Policy, whichever is higher
- Health and Safety – we require working conditions in compliance with all applicable laws regarding worker health and safety
- Bribery – we prohibit improper payments in the conduct of our business and expect full compliance with all applicable anti-corruption laws
- Recruitment of Workers – we require labour recruitment and employment procedures to be carried out in a legal, ethical manner
- Water and Sanitation – we aim to understand and, where relevant, address water access risk, respecting everyone's right to safe, accessible and affordable water as well as to clean sanitation facilities
- Land Rights – we adhere to the principle of free, prior and informed consent (FPIC). We follow all applicable laws relating to the rights of land and natural resources

REPORTING ENTITY AND STRUCTURE

This joint Modern Slavery Statement (**Modern Slavery Statement or Statement**) has been prepared by Kraft Heinz Australia Pty Limited ACN 622 234 379 in accordance with the Modern Slavery Act 2018 (Cth) (**the Modern Slavery Act**).

This Modern Slavery Statement covers Kraft Heinz Australia Pty Limited ACN 622 234 379, the Australian subsidiary of the US-based Kraft Heinz Food Company.

The Statement also covers the owned and controlled entities of Kraft Heinz Australia Pty Limited, including the following subsidiaries, which are also reporting entities under the Modern Slavery Act:

- H.J. Heinz Co Australia Limited ACN 004 200 319
- Golden Circle Limited ACN 054 355 618
- Cerebos (Australia) Ltd ACN 004 304 803
- Salpak Pty Limited ACN 004 536 636

(each, a **Reporting Entity** and together **Kraft Heinz Australia or Company**).

This Modern Slavery Statement describes the risks of modern slavery in the operations and supply chain of Kraft Heinz Australia and its owned and controlled entities for the period from 1 January 2023 to 31 December 2023 (the Reporting Period), actions taken by Kraft Heinz Australia to assess and address those risks and how Kraft Heinz Australia evaluates the effectiveness of these measures.

The term 'modern slavery' as used in this Modern Slavery Statement takes the meaning given to it in the Modern Slavery Act.

The Process Consultations

This Modern Slavery Statement covers each Reporting Entity, following an active engagement and consultation process with the Kraft Heinz Australia Human Rights and Sustainability Steering Committee and the executive leadership team of each Reporting Entity. This process included consideration and discussion of the Modern Slavery Act's reporting requirements, information regarding the actions we intend to take to address these requirements and the provision of relevant materials and regular updates.

The Human Rights and Sustainability Steering Committee includes representatives from legal, human resources, procurement, scientific and regulatory affairs, nutrition, product development and packaging functions and is co-chaired by the Kraft Heinz Australia General Counsel and the Head of Government and External Affairs. The Human Rights and Sustainability Steering Committee reports directly to the Kraft Heinz Australia Board of Directors.

A copy of this Modern Slavery Statement was provided to each entity owned and controlled by Kraft Heinz Australia Pty Limited (including each Reporting Entity) on 21 June 2024.

This Modern Slavery Statement has been approved by the Kraft Heinz Australia Board of Directors on 1 July 2024 on behalf of all Reporting Entities.

KRAFT HEINZ AUSTRALIA OPERATIONS AND SUPPLY CHAIN

Our Operations

As a large food and beverage company, Kraft Heinz Australia's operations are predominantly focussed on supplying food and beverage products to consumers and retailers and commercial customers in Australia and overseas.

After commencing operations in Australia in 1935, Kraft Heinz Australia has grown to employ approximately 900 people across its Australian offices and factories. At the end of 2023, Kraft Heinz Australia had 4 company-owned factories in Australia.

The following map depicts the locations of our factories around Australia:



Our Supply Chain

Our supply chain focuses on the sourcing and warehousing of ingredients and packaging required for the manufacturing of our food and beverage products and procuring other indirect goods and services that are necessary for the manufacturing process.

With a diverse portfolio of iconic and emerging brands, we aim to engage with our suppliers in a long term and stable relationship and therefore seek to do business with suppliers that share similar ethics and sustainability practices to us. We also work with external companies (contract manufacturers or 'co-packers') to produce products for Kraft Heinz Australia under our own brands.

At the end of 2023, Kraft Heinz Australia had approximately 120 packaging suppliers, 820 ingredients suppliers, including growers, 2600 indirect goods and services suppliers and 60 external manufacturers.

We aim to engage with our suppliers in a long term and stable relationship and therefore seek to do business with suppliers that share similar ethics and sustainability practices to us.

RISK OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN

Kraft Heinz Australia adopts a risk-based approach to modern slavery due diligence and has primarily focused on the human rights of our employees and contractors, along with the human rights of those employed by our suppliers and co-packers.

Our Operations

As of this Reporting Period, Kraft Heinz Australia has identified the actual risk of modern slavery in our own operations as low. This finding is based on the following initiatives and measures:

- Almost all of Kraft Heinz Australia's staff is engaged directly by Kraft Heinz Australia and their employment contracts are governed by the relevant Australian law. Kraft Heinz Australia employs human resources and legal specialists to ensure that contractual employment arrangements for Kraft Heinz Australia are lawful and compliant with the relevant regulatory requirements. We continually review our payroll processes and systems and practices to establish best practices and ensure compliance with the Fair Work Act 2009 (Cth) and applicable industrial instruments.
- Kraft Heinz Australia employees have high union engagement and membership, representing 62% of the blue collar workforce.
- Kraft Heinz Australia employees are free to negotiate collectively and if required involve third parties, such as unions, in such negotiations.
- We partner with reputable third-party labour providers who share our approach to Human Rights and have accepted our Supplier Guiding Principles (which embody these requirements).

Kraft Heinz Australia continues to monitor risk of modern slavery in its operations through regular employment engagement surveys, grievances raised by our team members through the human resources team and 24 hours help line and informal discussions, reflections and insights.

Sedex Ethical Trade Audits

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, self-assessment questionnaires (SAQs) and audit methodologies to inform our ethical sourcing approach.

Since 2021, we have conducted SMETA (Sedex Members Ethical Trade Audit) audits at Kraft Heinz's own factory sites in Australia and New Zealand. The audited facilities are involved in manufacturing of a range of different food products, including canned products, frozen vegetables, beverages, condiments and spices, and baby food. The SMETA standard is aligned with the Ethical Trading Initiative (ETI) Base Code, and covers labour standards, business ethics, health and safety and environmental practices. The audits identified no non-conformances relating to modern slavery or forced labour practices in any of our own sites. The findings of the audits highlighted good practices and areas of improvement for our facilities. We are working with our sites on implementing corrective actions and to ensure relevant improvement practices are in place.

Supply Chain

Kraft Heinz Australia acknowledges that there is an inherent risk of modern slavery instances in our supply chain due to the complexity and the multijurisdictional nature of our business, although we have found no examples of modern slavery practices in our supply chain within the Reporting Period.

As the basis for addressing modern slavery risk in our supply chain, we have chosen to prioritise suppliers that present the highest human rights risk and where Kraft Heinz Australia has the most leverage to implement practices that reduce this risk.

Kraft Heinz Australia carried out a baseline human rights risk assessment for this purpose in 2020 and 2021. It included our top 429 suppliers, across all four divisions namely packaging, ingredient, indirect services and external manufacturers (co-packers). This assessment was conducted together with ELEVATE, an industry leader in sustainability and supply chain services globally. It considered inherent sourcing risks (country of origin and type of product or service sourced) and business leverage insights to determine which segments of our supply chain provide the greatest opportunity to influence change, manage risk and drive impact.

The risk inputs involved evaluation of the relative risks of exploitation and human rights vulnerabilities involved in producing the products and delivering services within our supply chains.

Specific risk characteristics evaluated for each supplier included:

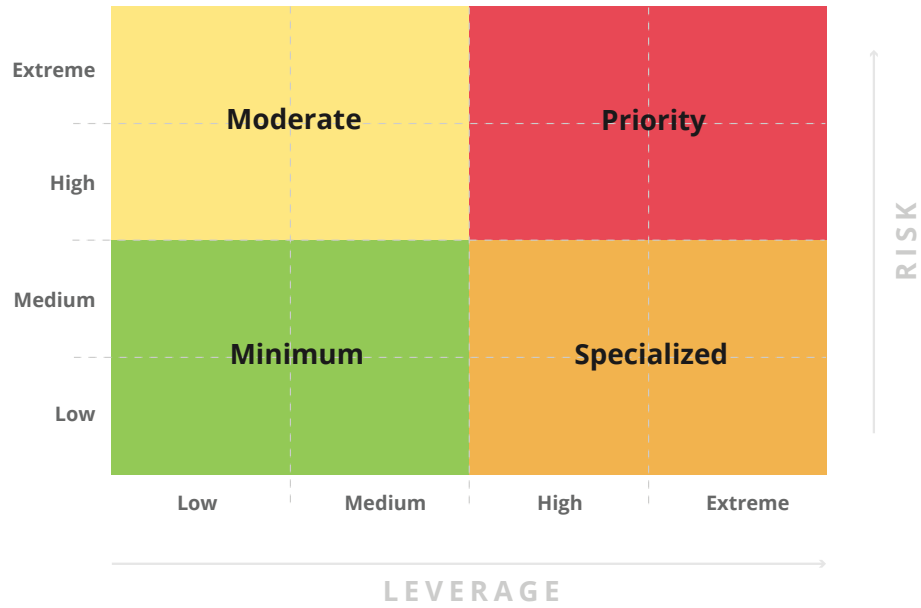
- **Workforce** – relating to the nature of the work, required skills
- **Product** – including seasonality, production processes, costs, and value
- **Business processes** – involving labour recruitment issues, transparency, and complexity.

Inherent geographic and commodity risks were determined through a blend of public domain datasets (for example, the United Nations, the World Bank, the Global Slavery Index and the International Labour Organisation) and ELEVATE's country risk scores based on annual audit data to reflect working conditions and human rights non-compliances on the ground.

The leverage inputs evaluated Kraft Heinz Australia's annual spend, spend trends and length of the relationship with the supplier. Each supplier was then assigned a risk and leverage rating based on the methodology described. These ratings determined the supplier 'category' or 'segment' for prioritised actions.

The risk scores were coupled with Kraft Heinz Australia's leverage data and each supplier was assigned a risk/ leverage rating, which determined the supplier 'category' or 'segment' for prioritised actions.

Risk Assessment Results



In the previous reporting period (the 2022 calendar year), 31 suppliers were selected based on this segmentation and asked to provide their existing ethical sourcing assessments (SEDEX’s SMETA Reports, SEDEX’s SAQ Reports and BSCI’s Audit Reports). For four suppliers who had not yet undertaken audits or self-assessments, Kraft Heinz Australia engaged ELEVATE to deploy Verified SAQs. This engagement and its results are described in Kraft Heinz Australia’s Joint Modern Slavery Statement 2022.

During the Reporting Period, we re-evaluated the ratings assigned to Kraft Heinz Australia’s suppliers using new risk and leverage scores determined by ELEVATE in January 2023 and used these revised ratings to generate a list of priority suppliers for our 2023 due diligence program (described below under Supplier Partnership Program).



ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY

Over this Reporting Period, Kraft Heinz Australia has implemented further steps to assess and address modern slavery risks in our operations and supply chain. Some of these actions are described below.

Policies and Compliance

Certain relevant policies have been implemented throughout our business. This is actioned through training programs. The Company encourages the reporting of non-compliance with these policies and follows up on complaints. Alleged violations are investigated and lead to consequences where appropriate.

Global Human Rights Policy

Our commitment to responsible business practices, continuous improvement, and respect for human rights is engrained within our business. This commitment is embedded within our Global Human Rights Policy which applies to both our own operations and our global supply chain. Our Policy is based on the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the principles set forth in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

We expect our employees, suppliers and all other business partners to adhere to the core guidelines within the policy. Specific focus is placed on the rights of vulnerable groups including foreign and migrant workers, women, children, indigenous populations, minorities and people with disabilities.

A Global Steering Group including the Chief Procurement Officer, Chief Ethics and Compliance Officer and Head of Corporate Social Responsibility is responsible for monitoring compliance with the policy, and day-to-day monitoring of human rights due diligence activities. Our multiple grievance channels are available for stakeholders to raise concerns and complaints confidentially and without fear of retaliation.

Supporting a Respectful, Non-discriminatory, and Safe Workplace in Kraft Heinz Australia and New Zealand

We have a diversity, equity, inclusion and belonging strategy and vision to advance our inclusive workplace culture and enhance feelings of belonging through creating equitable outcomes for all and leveraging the diversity of our people to enable innovation, engagement and success.

Business Resource Groups

This vision is brought to life by our employee-led business resource groups (BRGs). We currently have five such groups:

- Gender Equity, focused on providing equitable outcomes for all genders with a particular focus on female leadership,
- LiveWell, focused on providing a physically and mentally safe working environment for all,
- Indigenous Outreach, focused on indigenous reconciliation,
- Pride, focused on building a LGBTQI+ inclusive culture and
- Multiculturalism, focused on engaging and celebrating our diverse ethnicities.

Representation of the BRGs spans across various functions and levels of employees with current representation at over 50 members. The groups partner with our executive leadership team to develop plans and execute initiatives to build a diverse and inclusive culture and create a sense of community in the workplace.

Kraft Heinz Global Code of Conduct

All employees, officers and directors are required to abide by the company's Global Code of Conduct. The Global Code of Conduct sets high standards for conducting business in a legal and ethical manner and serves as the foundation of our corporate policies and procedures. The Code has dedicated chapters on building a respectful, non-discriminatory, and safe workplace, and protecting human rights for our workers and workers in the value chain.

To ensure compliance with the Global Code of Conduct's tenets, Kraft Heinz Australia regularly provides training, communications, and guidance to our employees around the world. Further, employees are required to annually certify that they have read and will follow the Global Code of Conduct. The document is available in 14 languages and can be accessed here [Kraft Heinz Global Employee Code of Conduct](#).

The Kraft Heinz Supplier Guiding Principles

We continue to implement our Supplier Guiding Principles (SGPs) with an aim to greatly increase transparency around human rights in our supply chain. The SGPs outline our requirements, standards and expectations for all our suppliers. This policy covers areas including business ethics, human rights and ethical labour practices, occupational health and safety, supplier diversity, protecting animal welfare, as well as environmental stewardship. Suppliers are required to manage their subcontractors and supply chains in a manner consistent with the SGPs.

Acceptance of the SGPs and commitment to comply with the requirements contained are part of every supplier contractual arrangement or purchase order with Kraft Heinz Australia. Kraft Heinz Australia reserves the right to monitor a supplier's compliance with the SGPs using supplier self-declarations, assessments, and/or verification through external audits.

Suppliers are required to provide a confidential mechanism for their workers to communicate any workplace grievances, misconduct, or violations of the SGPs, or legal or ethical concerns. Suppliers are also required to protect workers reporting violations in good faith or cooperating in any investigations against retaliation.

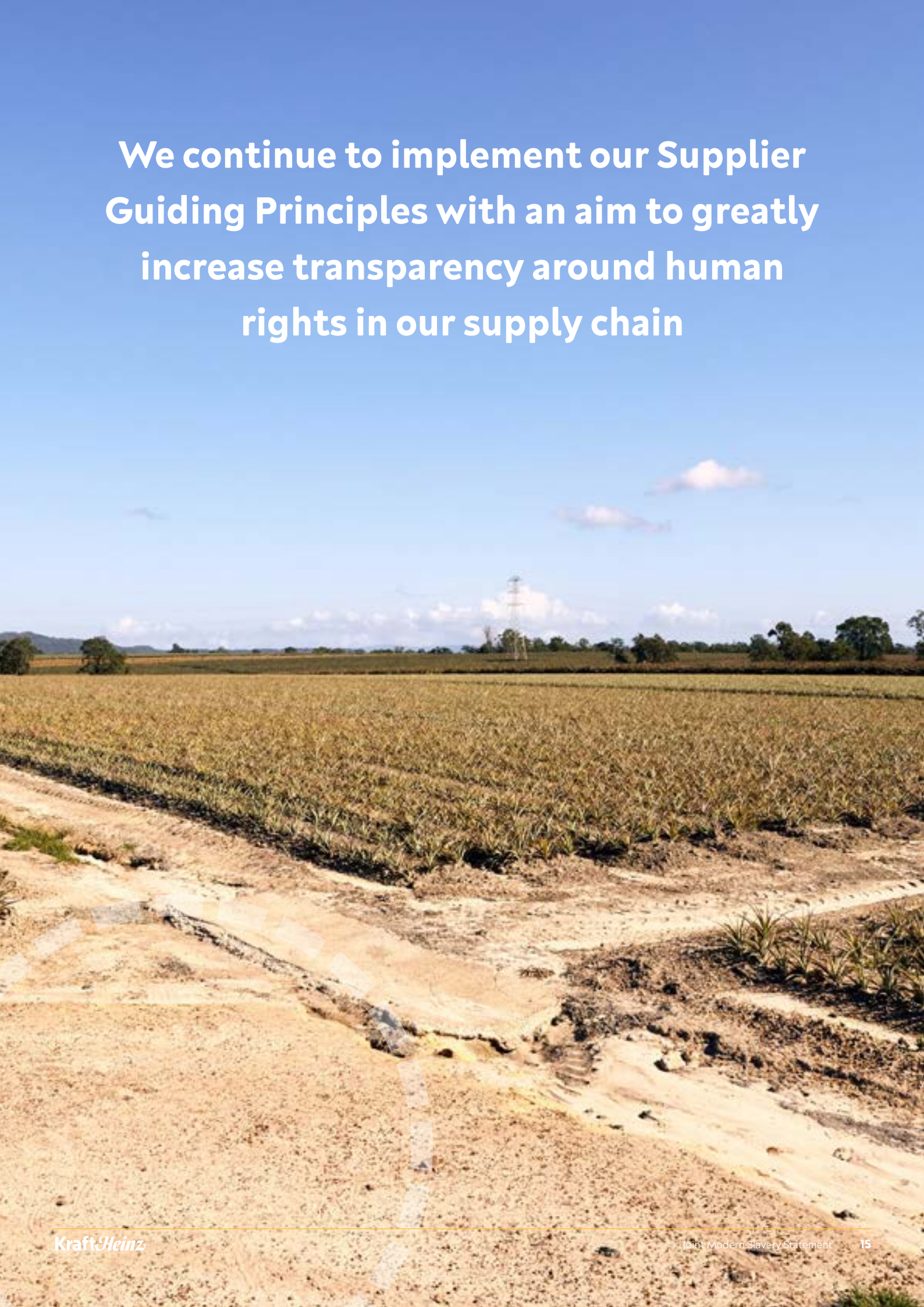
The Kraft Heinz Ethics & Compliance Hotline is hosted by an independent third party and is confidential, multi-lingual, and available 24 hours a day. Reports can be made via country-specific, tollfree phone numbers or online via www.KraftHeinzEthics.com. Kraft Heinz Australia encourages suppliers to communicate the availability of the Ethics and Compliance hotline to their workers. Kraft Heinz Australia does not tolerate retaliation against any person or supplier reporting potential misconduct in good faith.

Suppliers and their employees, contractors and agents are also encouraged to report any potential non-compliance with the SGPs or any violation or misconduct to the Kraft Heinz Ethics & Compliance Hotline.

In the event Kraft Heinz Australia becomes aware of supplier conduct that is not in accordance with SGP requirements, Kraft Heinz Australia will take appropriate action to thoroughly investigate any reported noncompliance and discuss the findings with the supplier.

In circumstances Kraft Heinz Australia determines remediation is required, the supplier is expected to implement a corrective action plan to promptly correct the non-compliance. In the event of serious or persistent conduct in violation of the SGPs, the conduct of the Supplier will be evaluated on a case-by-case basis. Kraft Heinz Australia reserves the right to terminate any agreement or business relationship with a supplier that fails to meet any of the Mandatory Requirements contained in the SGPs.

We continue to implement our Supplier Guiding Principles with an aim to greatly increase transparency around human rights in our supply chain



NEW ACTIONS TAKEN DURING THE REPORTING PERIOD

Audits and Self-assessments of Our Own Operations

In 2023 we arranged 4-Pillar SMETA audits of three Kraft Heinz sites in Australia and New Zealand:

- A first-time audit of the Golden Circle beverages and canning factory in Northgate (Queensland)
- A second audit of the gravy, sauces and condiments factory in Seven Hills (NSW)
- A second audit of the frozen vegetables factory in Christchurch (New Zealand)

The audits covered labour standards, health and safety, environment and business ethics in accordance with the SMETA Best Practice Guidance (version 6.1). They were conducted by Sustainable Assurance Solutions Pty Ltd through auditors certified by the Association of Professional Social Compliance Auditors Inc. (APSCA). The audits took place over a period of 1.5 to 3.5 days (depending on the number of workers at the site) and included management interviews to ascertain company practice, a site tour, a detailed review of human resources and health & safety documents as well as a series of interviews with workers (without the presence of management and under conditions of confidentiality).

None of the audits resulted in findings or allegations indicative of modern slavery at the audited sites.

During the Reporting Period, we also continued our process to update the SEDEX SAQs for our sites as a way of monitoring that the policies and procedures to ensure workers' rights and health and safety obligations are respected. In late 2023, SEDEX published a new SAQ form to replace previously completed SAQs by May 2024. Among other changes, the new form has an increased focus on recruitment of migrant workers. We commenced the process to complete the new SAQs for Kraft Heinz's factories in Australia and the majority of our factories in New Zealand before the end of the Reporting Period.

Follow-up from 2022 Supplier Due Diligence Program

In 2022, we had requested a targeted group of 31 suppliers (chosen based on the segmentation conducted by ELEVATE in 2020/2021) to provide their human rights audits and self-assessments for review. 20 suppliers provided independent audit reports (17 SMETA audit reports and 3 BSCI reports).

The independent organisations conducting these audits did not find any instances of modern slavery but, identified a number of non-compliances with the audit standards. As at December 2022, 16 of the suppliers had not yet closed out all these non-compliance issues. In 2023 we continued to monitor the progress and sufficiency of the outstanding corrective actions. Since then, seven suppliers have successfully completed all corrective actions, three have provided an action plan that would be completed after the end of the Reporting Period, three carried out a new audit in 2023, and one supplier was discontinued and not followed up. The remaining two suppliers did not provide information on their corrective actions and were contacted again in the 2023 Supplier Partnership Program described below.

For four additional suppliers who had not yet undertaken audits or self-assessments, Kraft Heinz Australia engaged ELEVATE to deploy Verified SAQs in 2022. The verification reports issued by ELEVATE at the end of this process identified similar issues to the SMETA audit reports obtained from other suppliers in the pilot program. We monitored the progress and sufficiency of corrective actions of suppliers who completed the Verified SAQ in 2023 as well. As a result, one of those suppliers was requested to carry out a SMETA audit (which took place after the end of the Reporting Period).

Supplier Partnership Program

During the Reporting Period, Kraft Heinz Australia commenced a supplier partnership program with a substantive modern slavery compliance component.

Under this program, all new suppliers must go through an onboarding verification process prior to being in a position to contract with Kraft Heinz Australia. During this exercise, suppliers must connect to Kraft Heinz Australia as a supplier in SEDEX. The SMETA audits and SAQs obtained through these connections will then be checked to disqualify any supplier found to have an unacceptable risk of modern slavery.

Existing suppliers will be requested to join the supplier partnership program and provide SEDEX connections as well. For the first phase of the supplier partnership program, we selected 89 existing suppliers based on the segmentations prepared by ELEVATE in 2021 and 2023, respectively. 18 suppliers who had been contacted in the 2022 due diligence program were also included, either because they had not responded or because the findings of their audits or self-assessments warranted further attention.

These 89 suppliers were contacted in late 2023. SMETA audits will be obtained from them and reviewed in the next reporting period.

Human Rights Risk Assessment of the Tuna Supply Chain

During the Reporting Period, we worked with Systemiq, a consultancy specialising in matters relating to achieving the United Nations' Sustainable Development Goals, to assess the human rights risk in the supply chain of our range of Greenseas branded tuna products. The tuna is caught by fishing vessels in the Western and Central Pacific Oceans, aggregated by several suppliers and processed by third party manufacturers in Thailand. Systemiq was requested to review all tiers of this supply chain and formulate recommendations for addressing identified risks as part of a broader engagement on environmental, social and governance matters.

Systemiq assessed that modern slavery is a key risk in the fishing industry. Specifically, remoteness, length of times away and limited communications makes fishers vulnerable to modern slavery. Migrant fishers are especially vulnerable, for reasons of potential debt bondage for recruitment fees.

Systemiq identified the following key risk factors in a tuna supply chain which could apply to us:

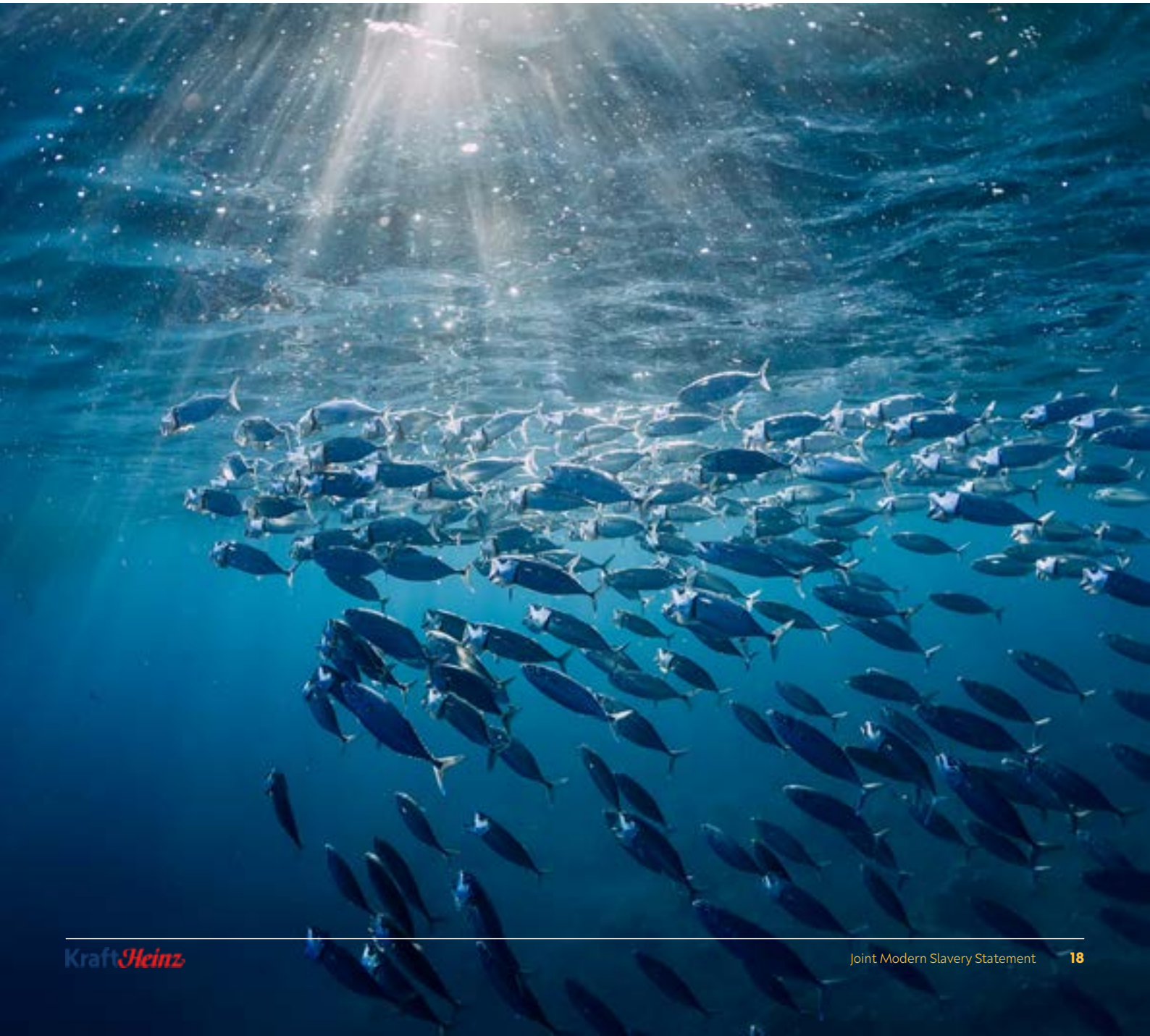
- Poverty – Systemic underpayment of fair wages to fishermen by vessel owners or middlemen
- Poor working conditions – Negative work environment such as lack of decent contractual employment protections, inadequate safety and isolation on vessels
- Modern slavery – Forced labour and potential human trafficking of workers in the value chain
- Child labour – Practice of employing children in fishery work that deprives them of their childhood and is harmful

Based on a review of best practice and information provided by Kraft Heinz Australia, Systemiq considered that with appropriate supplier cooperation, these risks can be mitigated by requesting additional information and creating better traceability.

The major specific changes to practices advised by Systemiq were to (i) gather additional data, (ii) seek to strengthen modern slavery mitigation actions of current suppliers (for example, through captain statements, onboard fishing vessel monitoring, policies on no transshipment or labour recruitment fees) and (iii) explore alternative suppliers with stronger mitigation actions already in place.

Kraft Heinz Australia has taken first steps to implement the changes proposed by Systemiq and will take further action in the next reporting period.

In addition, we obtained and reviewed SMETA audit reports on the processing operations of the third-party manufacturers of Greenseas products in Thailand. The reports contain no findings or allegations indicative of modern slavery at the audited sites. In light of the risk profile of this industry, the manufacturers have agreed to conduct SMETA audits annually.



MEASURING EFFECTIVENESS OF OUR ACTIONS

Human Rights Sub-committee

The Board of Directors of Kraft Heinz Australia Pty Limited has established a Human Rights Sub-committee to assist the Board in its commitment to protecting and upholding human rights in Kraft Heinz Australia's operations and global value chain. Specifically, the role of the sub-committee is to develop, implement and oversee human rights standards, policies, procedures, programs and reports; assess and address modern slavery risks in Kraft Heinz Australia's operations and supply chains; oversee compliance with the reporting requirements under the Modern Slavery Act; and address any adverse human rights impacts within Kraft Heinz Australia's operations and supply chains.

The sub-committee includes the General Counsel, Head of Procurement, Head of People & Performance and Head of Government Affairs of Kraft Heinz Australia. The sub-committee meets on a monthly basis.

As part of the tasks assigned to it by the Board of Directors, the sub-committee assesses the effectiveness of our actions in assessing and addressing modern slavery risks, including by reviewing and making decisions or recommendations based on the following information:

- Findings from SMETA audits and self-assessments of Kraft Heinz sites
- Findings from SMETA audits and self-assessments of suppliers to Kraft Heinz Australia
- Engagements with suppliers, including through the Supplier Partnership Program
- Grievances, complaints and other instances of potential non-compliance with legal requirements or Kraft Heinz policies
- Research and advocacy by governmental, non-governmental and academic organisations
- Best practice examples from other industry participants in Australia or overseas
- Information relating to modern slavery risk in our operations and supply chain obtained from other internal and external sources in various contexts.

Grievance Mechanisms for Employees and Stakeholders

Kraft Heinz Australia provides several ways for employees, suppliers, business partners and other stakeholders to raise concerns or complaints. This includes the reporting of potential misconduct to managers, Human Resource professionals, the Legal Department and the Ethics & Compliance team, and our confidential Ethics & Compliance Hotline. The Hotline is open to anyone inside and outside the Company and is maintained by a third-party provider with multilingual staff available 24 hours a day.

Reports can be made via country-specific toll-free phone numbers, or online. Kraft Heinz Australia is monitoring the effectiveness of the processes and procedures to address the modern slavery risks that our business causes, contributes to, or is directly linked to, in line with the Modern Slavery Act.

Ethics and Compliance Training

'We Do the Right Thing' is one of Kraft Heinz's core Company Values and is something everyone is expected to follow. Kraft Heinz utilises a mandatory interactive training programme for the various components of the Employee Code of Conduct. Its modules are focused on honesty, integrity, respect, dignity and conduct of business in an ethical and legal manner.

Employee Engagement Survey

Our annual 'Employee Engagement Survey' is a key moment in our employees' calendar and helps us measure and shape our culture for today, tomorrow, and the future. It is part of a larger listening strategy designed to check in with our employees throughout the year and to help us continuously improve our employees' experience. The engagement survey provides an opportunity for employees to share their honest feedback about what it is like to work at Kraft Heinz Australia.

The survey targets several key issues of employee engagement that research has found to be critical components of successful organizations and provides an opportunity for team members to share their honest feedback about what it's like to work at Kraft Heinz Australia. From 2017 to 2023, we have seen an engagement increase among Kraft Heinz Australia team members (64 → 71), with the response rate more recently at 90%.

Our goal is to track our engagement levels and leverage survey results in an action plan to enhance our workplace culture and transform Kraft Heinz Australia into an even better place to work.

Complaints Investigations

We assess, monitor and investigate complaints that are raised in various forms including through our established grievance mechanisms and engagement with industry unions. These channels are frequently used to raise issues encountered in Kraft Heinz Australia's workplaces, including some complaints about inappropriate behaviour by co-workers or managers. We therefore believe that the existing grievance mechanisms are effective in raising and addressing matters relevant to human rights and ethical labour practices in our operations.

During the Reporting Period, 17 complaints relating to inappropriate conduct at Kraft Heinz Australia sites were investigated. None of the issues about Australia raised through our grievance mechanisms during the Reporting Period related to allegations of modern slavery.

**'We Do the Right Thing'
is one of Kraft Heinz's core Company
Values and is something everyone is
expected to follow.**

LOOKING AHEAD

We have established a solid foundation for our Modern Slavery compliance journey and are determined to make further progress. Our objectives for 2024 include to:

- Continue and expand the SMETA audit program for our Australian and New Zealand factories
- Increase the number of suppliers from whom we obtain and review SMETA (or equivalent) audits through the Supplier Partnership Program
- Collect and review information about human rights risks involved in growing and harvesting key commodities sourced by Kraft Heinz Australia.

Our focus will remain on responsible sourcing, protecting vulnerable workers and collaborating with key stakeholders and suppliers to prevent and address modern slavery in our operations and supply chain.

This Modern Slavery Statement was approved by the Board of Kraft Heinz Australia Pty Limited (in its capacity as the principal governing body of Kraft Heinz Australia Pty Limited and as the parent company of each other Reporting Entity) on 1 July 2024.

This statement was signed by Jerome Drolet in his capacity as a director of the Board of Kraft Heinz Australia Pty Limited and ANJ President on 1 July 2024.



Jerome Drolet

Director Kraft Heinz Australia Pty Limited – ANJ President



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