



Monde Nissin Australia



MODERN SLAVERY STATEMENT 2023



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CEO MESSAGE

Our purpose of being “Simply Good for People and Planet” continues to be deeply ingrained in our culture, driving our commitment to uphold human rights and fair labour practices within our business and supply chain. In 2022, we made significant strides by launching our Sustainability Strategy (2022 - 2025) and Goodness Framework, which guides us in delivering on our Purpose. This framework is built on three pillars: Good for People, Good for Planet, and Good for Partnerships. Our 'Fair' Human Rights and Modern Slavery program aligns closely with the 'Good for People' pillar.

In 2022, we set clear expectations for human rights by refining our internal policies and procedures, establishing a cross-functional working group, training our employees, and piloting due diligence tools with several key suppliers.

In 2023, we refined our approach based on our learnings, understanding our capacity amidst a challenging business environment that was seen throughout industry with increasing cost of living challenges for our consumers and increased supply chain cost all impacting our business. We finetuned our focus on training employees, specifically those who deal directly with suppliers, and setting KPIs around training, completing a 4 Pillar SMETA audit at our Black Swan site and supplier due diligence progress. We have prioritized embedding these policies and procedures within our operations and continued on a learning path to enhance our effectiveness in addressing modern slavery risks.

We are steadfast in our support of the Modern Slavery Act and its mandatory reporting requirements. It is with pride that we present our third Modern Slavery Statement, reflecting the extensive work undertaken to manage and mitigate the risks of modern slavery in our operations and supply chain.

The Monde Nissin Australia Board of Directors and Executive Leadership team approves this statement and our Modern Slavery 2023 report, and I sign on their behalf..



Hadrianus Setiawan
Chief Executive Officer
Monde Nissin Australia

Statement on the reporting entity Monde Nissin Australia (ABN: 25 169 518 325) is an Australian private company. The company is registered at Level 3 / 6 Nexus Crt, Mulgrave VIC, Australia. This Statement has been published in accordance with the Modern Slavery Act 2018 (Cth) (MSA or Act). It identifies the steps Monde Nissin Australia undertook during year ending 30 December 2023.

COMPANY INTRODUCTION

Monde Nissin Australia (MNA) sources, manufactures, stores and distributes some of Australia's most loved brands, including Nudie, Black Swan, Wattle Valley, Peckish and Quorn. We understand the importance of corporate social responsibility and human rights and work together to ensure our vision of:

'Simply Good for People and Planet'

Is reflected in activities we undertake as well as across our operations and supply chain.

Our company values reflect our belief in the rights of all individuals to have fair and just working conditions:

Care; Teamwork; Excellence; Fun



Care

We are passionate about the work we do, and act with integrity and honesty. We value and support each other with empathy and genuine respect, creating a workplace that is mentally and physically safe.



Teamwork

We respect and acknowledge all team members ideas and always have each others backs. We communicate openly, aligned to achieve our common goals, celebrating wins along the way.



Excellence

We plan for success through considered and balanced decision making. We operate with discipline, attention to detail and agility and have the courage to speak up to understand the WHY.



Fun

We recognise each others wins, big or small and celebrate with our colleagues. We have a laugh and don't take ourselves too seriously or worry about things we can't control.

Company STRUCTURE

Monde Nissin Australia Pty Ltd (ABN 25 169 518 325) is an Australian Private Company that has been operating since 2014 following the purchase and amalgamation of three individual business; Black Swan, Nudie Foods and Menora. We currently employ 349 individuals across VIC, NSW, WA & QLD, with the majority of employees in VIC and NSW.

The following business units make up Monde Nissin Australia:

- Black Swan
- Nudie Foods
- Menora
- Supply Chain and Logistics

These business units are supported by a shared service departments that includes the functions of finance, information technology, procurement, people & culture and business excellence (safety, quality and sustainability).

Our consumer brands are:



nudie®




Peckish™
— AIR BAKED LAYERS —



Quorn™



ESTD SOUTH MELBOURNE
— 1985 —
BLACK SWAN™



wattle
valley
FOODSTORE

COMPANY OPERATIONS AND SUPPLY CHAIN

OPERATIONS

Monde Nissin Australia core operations consist of procurement of both raw materials and retail food products, food processing and production, food storage and distribution. Currently our retail products are distributed domestically and into 15 international markets. Other core operations include the employment of 349 employees across the business.

Monde Nissin Australia Head Office:

- Mulgrave Victoria

Production Sites

- Clayton South, Victoria – Black Swan
- Eastgardens, New South Wales – Nudie

Warehousing and Distribution Sites

- Noble Park, Victoria
- Smithfield, New South Wales
- Perth Airport, Western Australia

SUPPLY CHAIN

The Monde Nissin Supply Chain includes the procurement of raw materials, finished products and services.

We source a wide range of raw materials, the majority of which are procured from domestic suppliers. These include:

- Fruit Juices
- Fruit, nuts, vegetables and spices
- Dairy product, including Australian Cream Cheese and Milk Powders
- Primary and Secondary packaging materials

We also procure finished retail product from both domestic and international (East and South East Asia; UK and European Union) suppliers, including:

- Rice Crackers
- Meat Replacement Products
- Dairy products, including butter, cheese and dairy based deserts
- Condiments, including tea, mustards, sauces and jams

The services we procure are mainly domestic and include for example:

- Domestic and International logistics and transport services
- Laboratory testing services
- Cleaning services
- Professional service consultants, such as legal services and marketing specialists
- Trades and maintenance services

For all materials and services sourced, our procurement team, in consultation with subject matter experts within the business, ensure safe, quality and continuous supply from reputable companies.

GOVERNANCE

FAIR: Human Rights and Modern Slavery working group

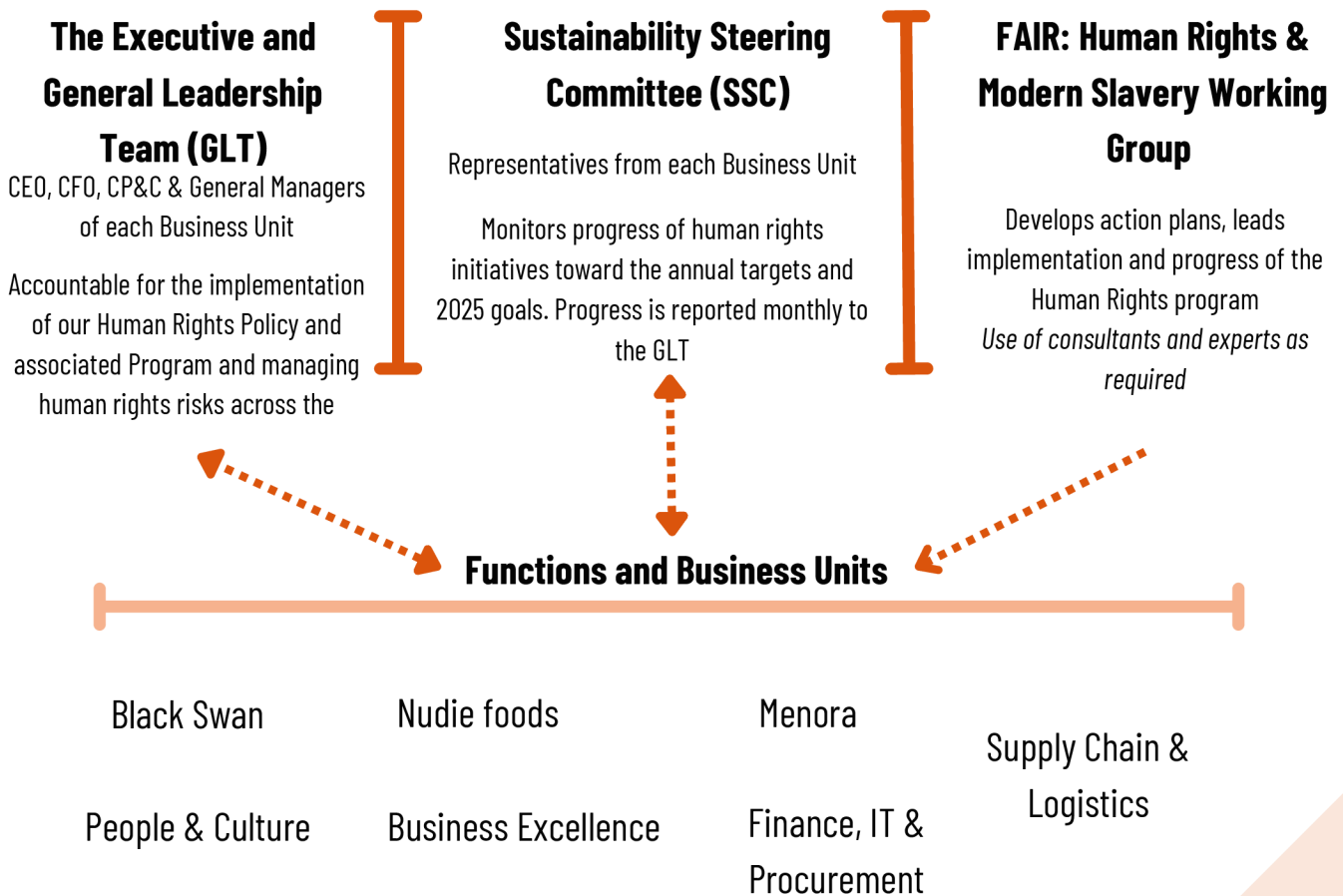
This reporting period is our second year of our FAIR; Human Rights and modern slavery program, under our Sustainability Strategy (2022-2025). Following our progress in 2022, the working group reflected on progress and continued to learn and adapt our approach to ensure we make steady and consistent progress by prioritising our activities against risk.

The FAIR: Modern Slavery Working Group meets quarterly to establish annual priorities and targets, monitor progress and the implementation of the modern slavery annual action plan. The group is cross functional and made up of Chief People & Culture Office, Head of Procurement, Head of Safety and Sustainability and Head of Quality Assurance.

The broader sustainability strategy, where the FAIR: Human Rights and modern slavery program sits, is managed under the following reporting framework.

Monde Nissin Australia Board

Responsible for reviewing, appraising and approving the Sustainability Strategy (2022 -2025), which includes human rights and our annual Modern Slavery Statement and policy commitment



Modern slavery risk assessment

During this reporting period the FAIR working group conducted a basic review of the F21 modern slavery risk assessment. Overall there was no material changes to the F21 risk assessment by category. We still acknowledge that the risks of modern slavery may be heightened in some of our procurement categories and supply chain operations as a result of the source of materials used in products supplied to us and the geographical location of some suppliers. Labour conditions was a key supply chain risk identified across many of the procurement categories as we have low visibility of local and overseas contracted and subcontracted business-related services and professional services, agricultural supply chains and packaging.

We deemed modern slavery risks as low for our direct employees. This means that we have direct visibility of employment terms and conditions, which are set out in either contracts of employment that are regulated by Australian employment laws and relevant industrial instruments. We do note that our higher area of risk locally is with labour hire engagement.

However we identified in our review we utilised more detailed spend data in order to prioritise our supplier engagement strategy with a focus on utilising the SEDEX platform to assist in risk management tools and supplier connections.

KEY SUPPLY CHAIN RISKS



Labour rights and low visibility in local and overseas contracted and subcontracted business-related services and professional services, such as transport and logistics, packaging and advertising and marketing.



Labour conditions in the cultivation, harvesting and processing of food products



Labour conditions and child labour in the overseas supply chain of materials such as paper and plastic.

ACTIONS TAKEN TO CONTROL IDENTIFIED RISKS

SUMMARY

The working group focused developing a more targeted annual action plan to achieve better progress against our goals while still building our internal framework and competency. The priority for 2023 was to start communicating our human rights expectations that are laid out in our Human Rights Policy and Supplier Code of Conduct more widely, following its development and trial of supporting tools in 2022. We did this by utilising the contractor engagement tools already available to us through our contractor management platform and online induction.

Our second priority was to drive better utilisation of our SEDEX membership through both supplier connections and completing a SMETA 4 pillar audit at one of our sites which is an excellent opportunity to examine our workplace and process and learn.

The actions taken by the working group within the period were:

- communication of human rights requirements to all workers that come to our sites (direct employees, labour hire and contractors)
- targeted Modern Slavery Awareness training to teams that directly engage with external suppliers
- development of Anti-bribery and Corruption Policy and supporting tools
- completion of a SEDEX 4-pillar SMETA audit at one of our sites
- communication and acknowledgement of Human Rights Policy and Supplier Code of Conduct with direct contractor companies
- a due diligence framework tool used in new co-manufacturer agreements and contracts

Our policy governance framework overtime as well as greater emphasis in embedding and integrating these within our practices and to our supply chain.

ACTIONS TAKEN TO CONTROL IDENTIFIED RISKS

GOVERNANCE SYSTEMS

Our policy governance framework continues to develop overtime to provide greater clarity and operation tools for our people on how to address issues. We have commenced development of two polices shown below in blue, ensuring that we are consulting with our people and reviewing good industry practices. This is balanced with a greater emphasis in embedding and integrating the other listed policies within our practices and to our supply chain.

Policy / Resource	Purpose
Human Rights Policy	Communicates our commitment to the fundamental human rights of people within our operations and supply chain. Aligns to the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.
Work Health Safety Policy	Outlines our commitment to the physical, psychological safety and health of our team members, contractors, visitors and other that may be impacted by our business operations
Anti Discrimination, Harassment & Bullying Policy	Outlines our commitment to value and respect the unique contributions of people with diverse backgrounds, and a zero tolerance of bullying and harassment behaviours.
Code of Conduct	Communicates how we expect team members to behave towards each other, in business dealings and the broader community. References details of our Integrity Hotline Policy.
DRAFT Diversity, Equality & Inclusion Policy	Outlines our commitment to creating a workplace culture that systematically supports diversity, equality and inclusive practices throughout an employee lifecycle and at all levels of the business. Provides greater detail and clarity on the requirements in the Code of Conduct and supports our Values
DRAFT Anti-bribery and Corruption Policy	Communicates our expectations and operational processes to ensure that our business practices, decisions and relationships are free from bribery and corruption. Provides greater detail and clarity on the requirements in the Code of Conduct
Supplier Code of Conduct	Articulates the expectations for our suppliers in relation to human rights, child labour and modern slavery, anti-bribery and corruption
Integrity Hotline Policy	Details the grievance mechanisms available to workers including an independent and anonymous reporting channel for team members (including contractors) to raise serious matters they don’t feel comfortable raising through other channels, including breaches of the law and/or conduct that breaches our Code of Conduct, Policies or other forms of unacceptable behaviours

DIRECT

Communicating our human rights expectations

In our to reinforce our Human Rights policy across all persons that are coming to our sites, including direct employees, labour hire and contractors, we have integrated our policy and the ETI base code poster into our general induction. The poster assists in communicating quickly to people and assists in addressing literacy and language barriers to that our expectations are clear to all, especially those labour hire workers that are at a higher risk of modern slavery based against our risk assessment. This is also supported with information on the Integrity Hotline grievance process.

Our policies are available to our people through a variety of ways:

- People & Culture intranet policy page for employees
- noticeboards to communicate our independent grievance hotline.
- A Human Rights and Modern Slavery intranet page to provide further education on modern slavery

Our policy commitments are supported by our People & Culture team and Business Excellence team, that provide specialised advice to team members on human resources, and sustainability and safety matters, respectively.

In 2023 we took a more targeted approach to educating our people that engage with suppliers and external companies on modern slavery. We continued to utilise our online Modern Slavery Act training and Modern Slavery awareness training programs to achieve this. The training in the Act provides legislative knowledge to our leadership team, while the general awareness training informs people on what modern slavery is and how to report concerns.

SUPPLY NETWORK & CHAIN

In 2022 our supply chain network focus area was to piloting our supplier due diligence framework with two strategic suppliers that were both in the agriculture procurement risk category. Taking the learnings from our pilot program, in this reporting period we targeted our roll out of the due diligence processes with our new co-manufacturer partners.

The pilot program also provided us with important understanding of our own resourcing limitations on how we can manage information accurately track visibility in our vast finished goods supplier network. We reviewed our options for this space and found that engaging with our finished goods suppliers through the SEDEX platform was our best option. This was done via a strategic engagement based on spend data, aligned to our due diligence framework.

For our lower risk suppliers, such as trades and maintenance providers that complete services locally at our sites, we utilised our existing contractor management platform to communicate our Human Rights Policy and Supplier Code of Conduct to contracting companies. This was reinforced to contractor workers through our online induction that provides direct information to individuals on our Human Rights Policy, the ETI Base code and our grievance mechanisms including our confidential 3rd party integrity hotline.

ASSESSMENT OF EFFECTIVENESS OF CONTROL MEASURES

As we prioritise building our internal governance and awareness in 2023, we modified our annual measures of effectiveness accordingly.

Area of Action	Measures of effectiveness FY 23
Policy and governance	<ul style="list-style-type: none">• Anti-bribery and Corruption Policy draft completed• 100% of procurement employees completed Modern Slavery Awareness training• 80% People & Culture employees completed Modern Slavery Awareness training
Mitigation of modern slavery risk	<ul style="list-style-type: none">• SMETA (4 pillar) audit completed at Black Swan site• 18 suppliers connected via SEDEX (increased from 8)• 8 new co-manufacturers completed modern slavery due diligence onboarding assessment• Modern slavery clauses placed in new contracts• Modern slavery clauses placed in contract templates for all future agreements• 65% (97) of onsite contractor companies have completed the Human Rights Policy and Supplier Code of Conduct
Remediate	<ul style="list-style-type: none">• All corrective actions from SMETA audit remediated within auditor given timeframes

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CONSULTATION

Monde Nissin Australia operates as a single corporate entity comprised of various internal business units, overseen by a group leadership team. In preparing this Statement, a Modern Slavery working group, consisting of cross-functional roles from the People & Culture, Procurement, and Business Excellence departments, was consulted to inform and contribute to its content. This working group meets quarterly to monitor the progress of our FAIR: Human Rights and Modern Slavery program, identify additional opportunities, and review our progress against the risk control plans that underpin this Statement.

The General Leadership Team, which heads group-wide functions, conducted a wider consultation for the final review before obtaining approval from the CEO and the Board.

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FUTURE PLANNING

Moving forward with our sustainability strategy 2022-2025, our FAIR working group will develop the year three annual action plan to progress our program. Key areas of focus will be:

- Greater implementation of our supplier due diligence process into new contracts and supplier network partners
 - Updating contract clauses with contemporary wording in relation to Human Rights and anti-slavery
 - Launch of our Anti-Bribery and Corruption Policy and supporting operational tools
 - Launch of our Diversity, Equality and Inclusion Policy and a DE&I survey for our internal staff to help prioritise our actions
 - SEDEX platform training for our supplier facing roles to ensure best use out of the supplier risk assessment tools
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APPENDIX

Compliance elements for the statement

This Modern Slavery Statement was prepared in accordance with the criteria set out in the Modern Slavery Act 2018 (Cth) (Australia). The table below outlines where information related to each mandatory reporting criteria can be located within the report.

MANDATORY REPORTING CRITERIA	LOCATION IN DOCUMENT
Criteria 1. Identify the reporting entity	Section 1: CEO message
Criteria 2. Describe the structure, operations and supply chains of the reporting entity	Section 2
Criteria 3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Section 4
Criteria 4. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 3, 5
Criteria 5. Describe how the reporting entity assess the effectiveness of such actions	Section 6
Criteria 6. Describe the process of consultation with any entities that the reporting entity owns or controls	Section 7
Criteria 7. Additional information	Section 8