



# Modern Slavery Statement

YEAR ENDING 31 JULY 2022



## REPORTING ENTITY

This Statement describes the actions taken by The Arnott's Group to address modern slavery risks in our business and supply chains in the year ending 31 July 2022 pursuant to the requirements of the Modern Slavery Act 2018 (Cth). In this Statement, The Arnott's Group refers to Snacking Investments Holdco Pty Ltd (ACN 634 908 482) and its related bodies corporate, as defined in Section 50 of the Corporations Act 2001 (Cth). This Statement is given by Snacking Investments Holdco on behalf of itself, as a reporting entity, and the other reporting entities in The Arnott's Group<sup>1</sup>.

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1. This Statement is made for the following reporting entities within The Arnott's Group: Snacking Investments Holdco Pty Ltd (ACN 634 908 482), Snacking Investments MezzCo Pty Ltd (ACN 634 908 795), Snacking Investments MidCo Pty Ltd (ACN 634 908 893), Snacking Investments Bidco Pty Ltd (ABN 18 634 909 032), Arnott's Group Holdco Pty Ltd (ABN 17 635 109 081), Arnott's Bidco Pty Ltd (ABN 50 635 108 851), Campbell Australasia Pty Ltd (ABN 28 004 456 937), Arnott's Holdco Pty Ltd (ABN 80 007 245 105), Arnotts Pty Ltd (ABN 41 000 003 001), Arnott's Biscuits Limited (ABN 44 008 435 729), Good Food Partners Holdco Pty Ltd (ABN 47 646 575 662) and Good Food Partners Pty Ltd (ABN 38 104 048 400). This Statement predominantly describes the operations of Arnott's Biscuits Limited, Campbell Australasia Pty Ltd and Good Food Partners Pty Ltd, being the only reporting entities that operate The Arnott's Group's business in Australia.

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## CEO'S STATEMENT

# Creating an Ethical Supply Chain

The Arnott's Group is the custodian of some of Australia's most iconic food brands, many holding a special place in the hearts and pantries of Australians for over a century and a half.

As a company with a significant footprint including manufacturing facilities and corporate offices, we recognise the need to do our part in creating an ethical and sustainable supply chain in which we uphold the highest standards for all people.

In June 2022, The Arnott's Group released its Sustainability Report, which follows on from our Sustainability Statement released in 2021.

Where the Statement outlined how we as a business intended to do our bit in preserving the planet and its people, and promoting connectivity and community, our Sustainability Report outlines the actions we have taken.

Our Report includes a Scorecard for our three sustainability pillars – Source, Make and Connect – and we are on track or ahead of the targets in all pillars.

For our business, sustainability is a priority. It is one of our core values and guides who we are and how we operate.

Eliminating modern slavery is something we are committed to, and is a key focus of our sustainability strategy.

Across all areas of our business we have standards in place to ensure we deliver on our commitments. How we uphold those standards across our business activities in Australia, Asia and New Zealand is outlined in our 2022 Modern Slavery Statement.

I am proud of the work our team has undertaken in the past year to minimise, identify and mitigate modern slavery risk. It builds on the previous year's strong and meaningful actions by:

- Enhancing our existing processes for engaging new suppliers.
- Educating our employees on the risks of human slavery and how to identify and escalate those risks.
- Continuing to communicate with our suppliers about our responsible sourcing expectations and the actions they must take to meet those expectations.
- Acting to remove suppliers that do not comply.
- Facilitating easy access to an anonymous whistleblower platform.
- Completing Sedex self-assessments of all our manufacturing sites in Australia.

With an estimated 50 million people worldwide in modern slavery, we must be more determined than ever to eliminate the risks of modern slavery within our business, our supply chain, and where possible, beyond.



**George Zoghbi**

CEO, The Arnott's Group  
 Director, Snacking Investments  
 Holdco Pty Ltd



**1.  
Fostering  
equality, diversity  
& sustainability**

**2.  
High  
performance,  
with integrity**

**3.  
Balancing  
decisions from  
our head  
& heart**

**4.  
Delighting our  
customers every  
time**

WE STAND FOR

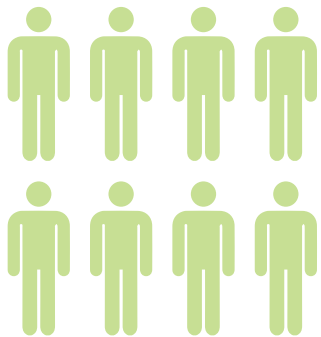


# 01



## Structure, Operations & Supply Chains

The Arnott's Group portfolio of brands continues the more than 157 year legacy of the Arnott family. We employ approximately 4,000 people in markets across Asia Pacific to provide high quality, great-tasting food to create delicious moments for consumers around the world. Our business is headquartered in Sydney, Australia, and we have bakeries in Sydney, Brisbane and Adelaide. We also operate bakeries in New Zealand and Indonesia. In addition to the Arnott's brand, our portfolio includes Campbell's products in Australia, Malaysia, Hong Kong and Japan, with manufacturing operations for these products in Shepparton, Australia and Petaling Jaya, Malaysia. The Arnott's Group is also the majority owner of cereals and snacking business Good Food Partners (GFP), which has manufacturing operations in Scoresby, Dandenong South and Leeton, Australia. Collectively, The Arnott's Group, sources direct inputs for our products, and other goods and services for our operations, from suppliers all over the world.



**4,000+**

people are employed  
in markets across  
Asia Pacific



## Structure

Snacking Investments Holdco Pty Ltd (ACN 634 908 482) is an Australian private company which owns the reporting entities within The Arnott’s Group.

They are:

- **Arnott’s Biscuits Ltd** (ABN 44 008 435 729), which operates the biscuits and snacks portfolio; and
- **Campbell Australasia Pty Ltd** (ABN 28 004 456 937), which operates the juice, soup and stock portfolio.

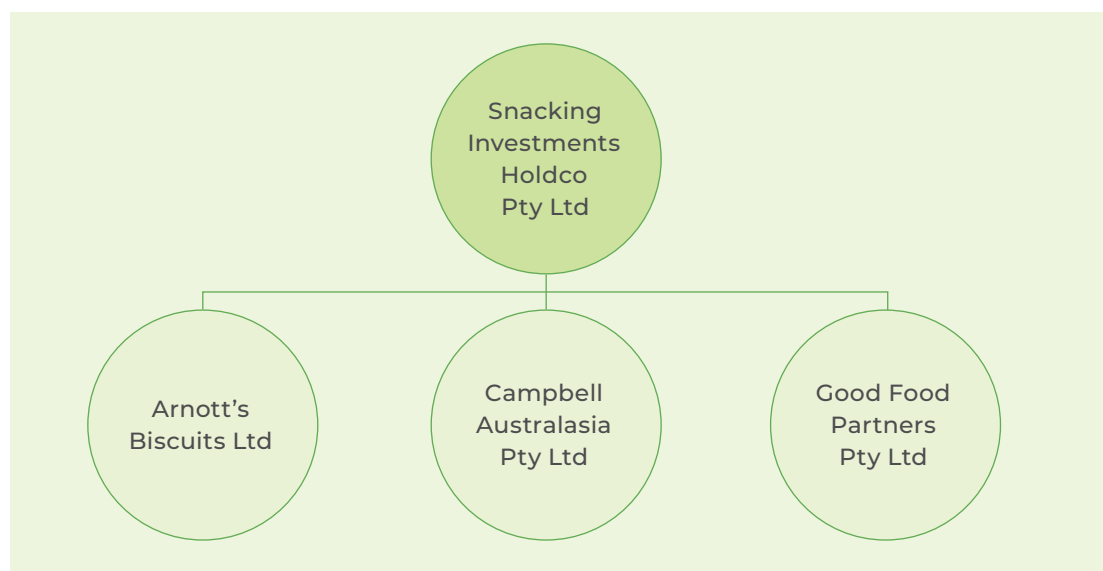
These two companies essentially operate as a single business using the same policies and processes, and under the management of the same leadership team.

Snacking Investments Holdco also owns a 75 per cent interest in **Good Food Partners Holdco Pty Ltd** (ABN 47 646 575 662), which is the holding entity for Good Food Partners Pty Ltd (ABN 38 104 048 400).

**Good Food Partners Pty Ltd** operates a cereals and snacks portfolio as a standalone business unit within The Arnott’s Group (referred to in this Statement as “Good Food Partners”). This Statement includes activities of Good Food Partners Pty Ltd as the operating reporting entity for the Good Food Partners business.

The registered office for all reporting entities in The Arnott’s Group is in North Strathfield, New South Wales, Australia.

Outside of Australia, Snacking Investments Holdco owns The Arnott’s Group operating entities in Hong Kong, Indonesia, Japan, Malaysia and New Zealand. Snacking Investments Holdco does not itself carry out The Arnott’s Group’s business activities.



## Brands

The Arnott's Group portfolio of brands includes household names such as Tim Tam, Shapes, Iced VoVo, SAO, Vita Weat, Salada and Tiny Teddy. We also own the full range of 180 degrees crackers and biscuits brands, following acquisition of the New Zealand manufacturer during the previous reporting period.

In addition to biscuit brands, our portfolio includes Campbell's soup, stock and juice brands. We own the Country Ladle brand within this portfolio and use other key brands (such as Prego and V8) under licence from Campbell Soup Company.

Good Food Partners is a business unit of The Arnott's Group that has a portfolio of cereals and snack brands which includes Messy Monkeys, Heritage Mill, Arnold's Farm, Freedom Foods and Sam's Pantry. Good Food Partners also acquired the Sunsol brand of premium cereals during the reporting period.





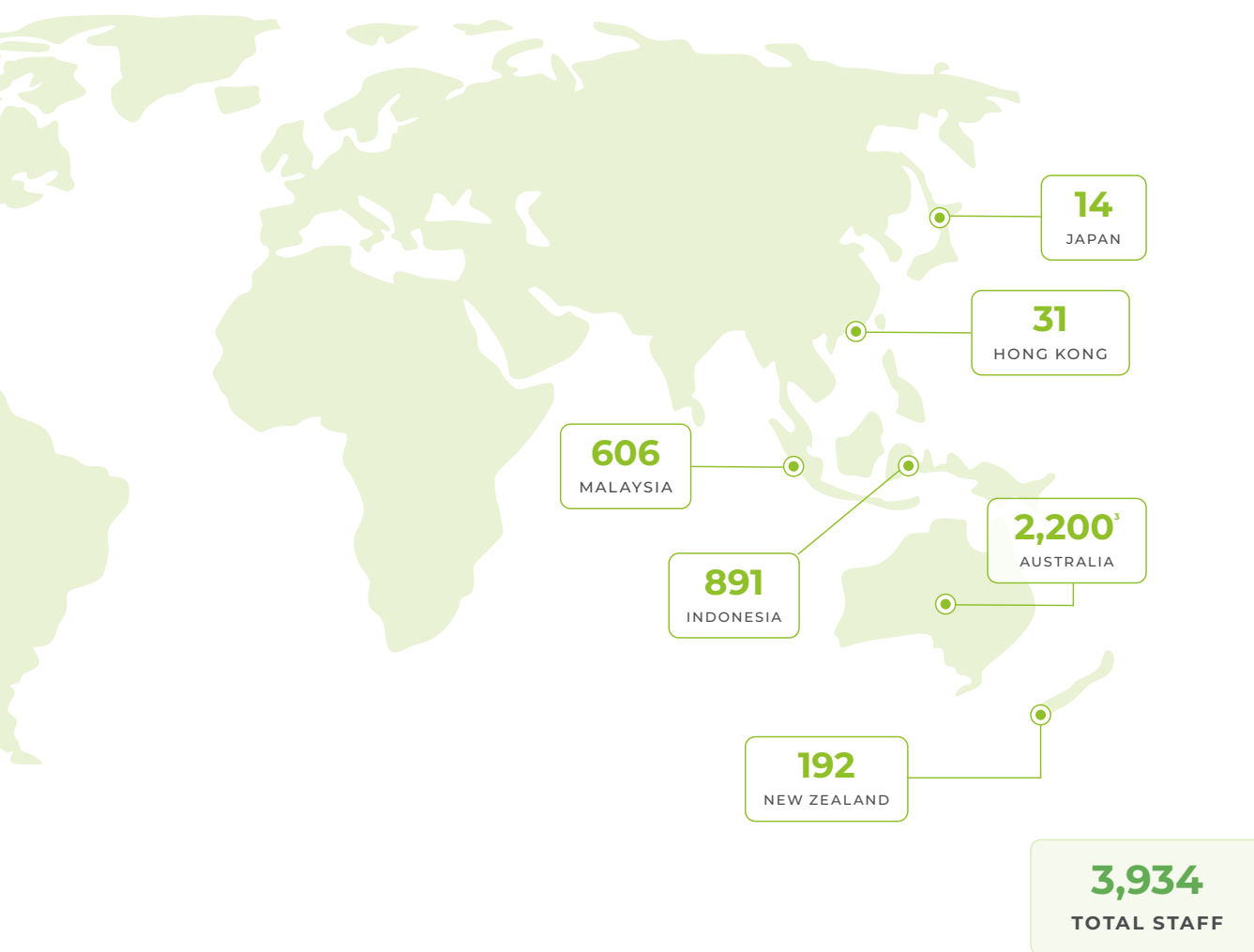
## Operations

The Arnott's Group undertakes a range of activities in pursuit of our business objectives and standards.

These include:

- Direct and indirect employment in manufacturing, field sales and corporate activity.
- Procurement and purchasing of ingredients, packaging and other materials and services.
- Production of biscuits, crackers, snacks, cereals, meals, soup, stock and juices.
- Development of new food products.
- Merchandising services at customer retail premises.
- Product distribution, marketing, sales and exports.
- Operation of The Arnott's Foundation, a charitable arm supporting community initiatives.

### GEOGRAPHIC STAFF PROFILE<sup>2</sup>



2. Approximate employee numbers (excluding casual employees) as at 31 July based on country of incorporation of employing entity.

3. Of this number, 1,723 were employed by Arnott's Biscuits Limited, 140 were employed by Campbell Australasia Pty Ltd, 337 were employed by subsidiaries of Good Food Partners Holdco Pty Ltd.



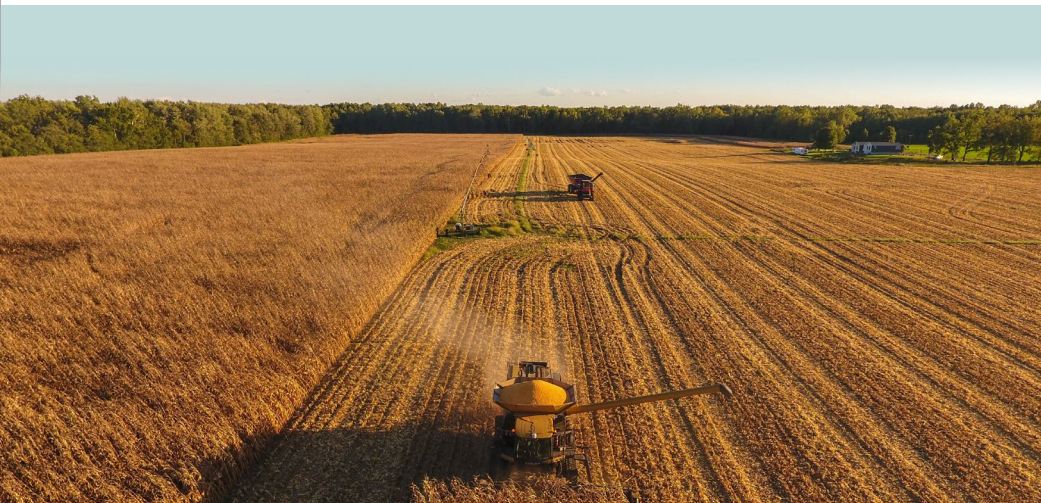
## Supply Chains

The Arnott's Group (excluding Good Food Partners) supply chain arrangements were largely the same as in the previous reporting period.

Most of our long-term arrangements with key ingredient suppliers remained in place, and we continued to utilise short-term arrangements as necessary.

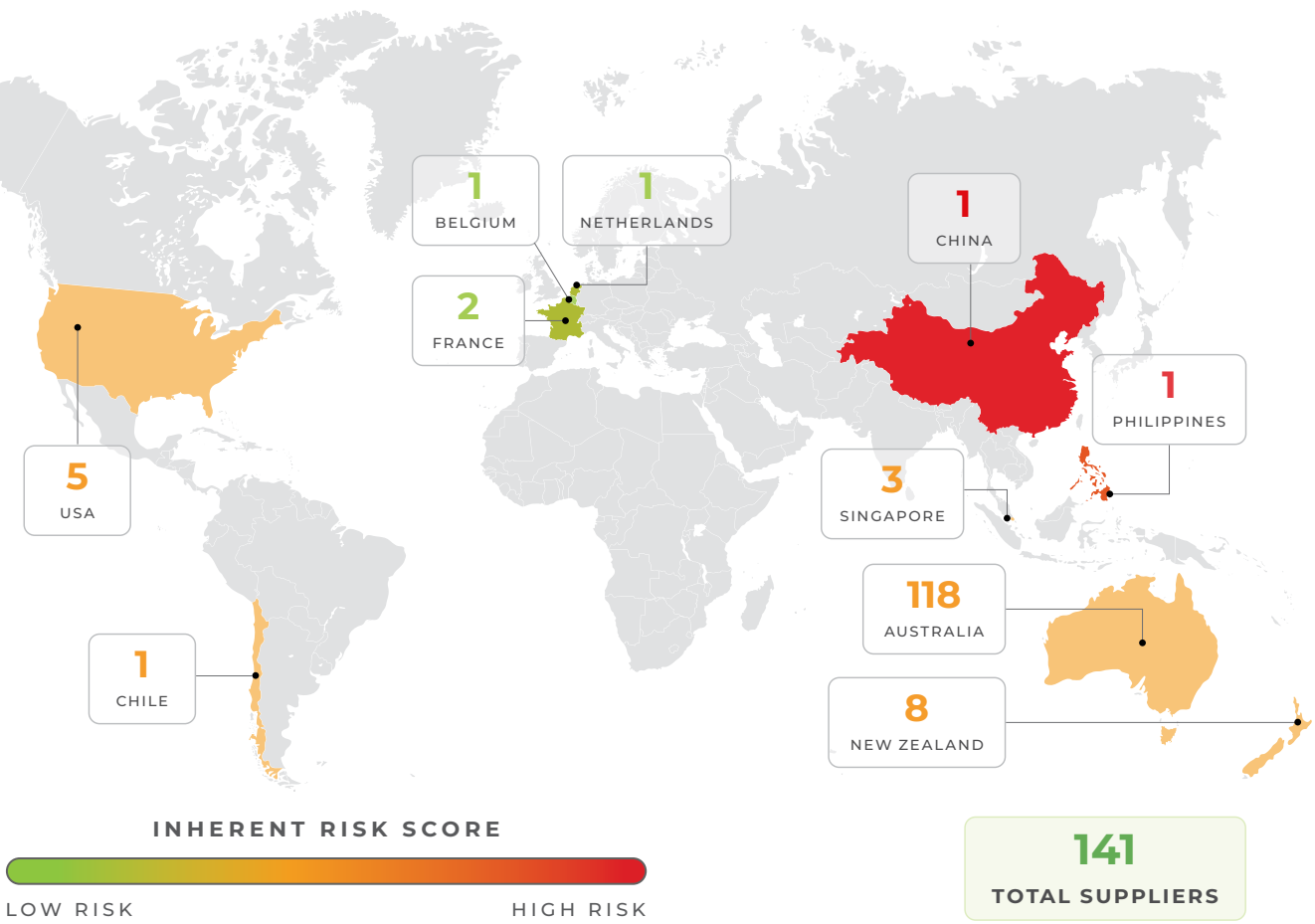
We also continued our commitment to local manufacturing, with more than 99 per cent of products sold in Australia made in Australia.

During the reporting period, The Arnott's Group Australian operations (excluding Good Food Partners) sourced inputs for our products directly from approximately 141 suppliers, the majority of which are based in Australia.<sup>3</sup> These included ingredients such as flour, dairy, salt, flavours, colours, juice concentrates, vegetables, spices, fruits, yeast, diced tomato and tomato paste, sugar and other sweeteners, cereals, malt, cocoa, nuts, eggs, chocolate, and oils, as well as packaging such as paper, plastic and adhesives.



3. As at the end of the reporting period, we had approximately 234 suppliers of direct inputs to production. This included 141 whom we engaged directly, with the remainder engaged through a distributor.

**RISK SCORE FOR SUPPLIERS OF DIRECT INPUTS**



We procured other goods and services from approximately 1,624 other suppliers, including maintenance and operations, marketing, logistics, capital, human resources, corporate, IT and telecommunications, and utilities services.

In addition to engaging Australian based suppliers, we procured goods and services from suppliers in Belgium, Brazil, Canada, Chile, China, Chinese Taipei, Costa Rica, Denmark, Egypt, France, Germany, Greece, India, Indonesia, Italy, Malaysia, Mexico, New Zealand, Norway, Philippines, Singapore, Spain, South Korea, Switzerland, Thailand, The Netherlands, Turkey, UK, USA and Vietnam.

The Arnott's Group does not engage suppliers in countries that are subject to international sanctions. As a number of those sanctioned countries are also associated with high risks of modern slavery, our sanctions compliance policy indirectly contributes to mitigating modern slavery risks in our supply chains.

We also worked with two Australian co-manufacturers during the reporting period, including one engaged to manufacture our gluten-free product lines.

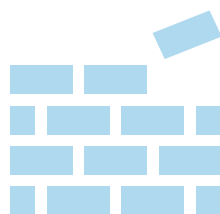


Good Food Partners sourced direct inputs for products from approximately 175 suppliers during the reporting period. These included raw materials such as oats, dried fruits, seeds, syrups and nuts, packaging and consumables. Most of these direct suppliers are based in Australia.

Good Food Partners also sources from suppliers in Asia, Europe, South America and USA through arrangements with local suppliers.

# 02

## Assessment & Mitigation of Modern Slavery Risks



During the reporting period, The Arnott's Group continued to build on our previous efforts to address modern slavery risks in our operations and supply chains.



Our actions included:

- Enhancing our supplier management processes to incorporate key steps required by the controls that we established during the previous reporting period, to minimise modern slavery risks when engaging new suppliers.
- Further educating our employees on modern slavery risks by proactively sharing our previous Modern Slavery Statement, reinforcing our policies, and continuing to roll out our online modern slavery training program.
- Continuing to work with suppliers to secure and confirm their commitment to responsible sourcing, including in relation to modern slavery.
- Taking action to remove suppliers from our supply chain who we identified to be associated with modern slavery practices.
- Completing Sedex self-assessment questionnaires (SAQs) for all of our Australian based manufacturing sites.
- Enabling ready access for our suppliers to our anonymous whistleblower platform for the reporting of modern slavery concerns relating to our business.
- Continuing our robust controls relating to the employment of our people and reviewing our payroll controls to ensure our people are correctly paid.



## Our Actions

In our third year of reporting under the Modern Slavery Act, The Arnott's Group continued to progress our efforts to minimise, identify and mitigate modern slavery risks.

During the reporting period, our Modern Slavery Working Group pursued the following actions aimed at eliminating modern slavery risks in our operations and supply chains.



### Bringing our Modern Slavery Guidelines and Checklist to Life:

- In the last reporting period, we developed The Arnott's Group Modern Slavery Guidelines which outline our approach to addressing and eliminating modern slavery risks within our operations and supply chains. The Guidelines include the process for assessing modern slavery risk in relation to prospective suppliers, our minimum conditions of engagement, and a process for reporting and dealing with modern slavery concerns that arise.
- We also developed a Modern Slavery Checklist to help our people comply with the Guidelines when engaging new suppliers. The Checklist includes a requirement for suppliers in industries typically associated with a high risk of underpayment of workers to complete a questionnaire in relation to their payment rates and practices, providing us with key data points to assess underpayment risk.
- In this reporting period, we implemented changes to our supplier registration system to include prompts for actions and information, to ensure compliance with key steps in our Checklist. These include:
  - Confirming the supplier's Sedex membership where required by our Guidelines, as well as their Sedex risk rating to help identify any high risk suppliers warranting further due diligence.
  - Ensuring suppliers are provided with the key documents that we require them to comply with, including our Responsible Sourcing Supplier Code.
  - Prompting users to issue our underpayment risk due diligence questionnaire to relevant suppliers.





### Educating our people:

- Building on previous communications, we reinforced with our people The Arnott's Group expectations of them in managing our modern slavery risk during this reporting period. We did this through the creation of an ongoing annual communications program that includes the recomunication of the Guidelines and Checklist in English, Indonesian, Malaysian and Japanese. Having multi-language versions ensures we are building greater understanding among our Asian based employees of the importance of recognising and taking action against modern slavery risks, particularly as those risks are more prevalent in the Asia region as compared to Australia and New Zealand.
- We continued to deliver our online modern slavery training course, rolling this out to all new salaried employees within three months of joining our business. This reflects our commitment to ensuring our employees are well informed of The Arnott's Group position on modern slavery, and relevant policies and procedures, from the start of their journey with our business.



### Utilising Sedex to help identify modern slavery risks in relation to our suppliers:

- We continued our program to establish Sedex relationships with our suppliers and to actively request that our suppliers complete a Sedex self-assessment questionnaire (SAQ). This enables us to have a more comprehensive insight into modern slavery risks associated with their business. As we did in the previous reporting period, we prioritised the suppliers of our key materials (flour, dairy, oils, sugar and cocoa, which comprise approximately 60 per cent of the materials we procure) for this program.
  - The increased number of Sedex relationships with our suppliers facilitated a more accurate assessment of modern slavery risks in relation to a greater proportion of our suppliers. As a Sedex relationship enables visibility of a supplier's SAQs and ethical audit reports, we could more readily identify any modern slavery concerns in relation to these suppliers and take appropriate action.
- For example, where we identified a high risk rating from a supplier's SAQ, we worked with the supplier to understand the nature of the non-compliances and the steps required to address them. Established Sedex relationships have also provided greater visibility of any modern slavery risks at an individual site level, allowing us to make better informed decisions about the ongoing engagement of suppliers on a site by site basis.
- We continued to monitor our progress against targets for Sedex relationships and SAQ completion across our supplier base, which we had set in the last reporting period. Our progress against these targets is detailed in the "Measuring Our Effectiveness" section.



### Leveraging our industry relationships and insights to help identify modern slavery risks in relation to our suppliers:

- In addition to our internal controls, we closely monitor the industries in which our suppliers operate. We do this through strong relationships with our key suppliers and by using external monitoring tools such as Stroom, a comprehensive, industry leading media monitoring service.
- As a result, we are well placed to keep abreast of modern slavery issues which emerge that could have potential and/or real impacts on our business. In this reporting period, our monitoring alerted us to modern slavery risks in the sourcing of palm oil for our products. The actions we took on this issue are detailed in the “Key Risks Identified” section.



### Reinforcing avenues for reporting modern slavery concerns:

- In the last reporting period, we expanded the coverage of our whistleblower platform to enable suppliers and other third parties to report any modern slavery concerns confidentially and anonymously. This year, we published details of how to report modern slavery concerns relating to our business on our external supplier website. We also added the QR code for accessing our whistleblower platform to ensure our suppliers can easily access it to report any modern slavery concerns directly and anonymously.
- As with the previous reporting period, we continued our internal “speak up” communications campaign, including reminders from our CEO, to promote the platform to our people as a confidential way to report concerns.



### Ethical audits:

- Holding to the commitment we made in the previous reporting period, and in the spirit of holding ourselves to the high standards we expect of our suppliers, we completed SAQs for The Arnott’s Group manufacturing sites across Australia. The SAQs are published on the Sedex platform and are accessible by Sedex members with whom we have a relationship.
- Good Food Partners continued its existing audit program of completing SAQs every six months, as well as ethical audits every 24 months, for each of its sites.
- We did not identify modern slavery concerns in relation to any of our sites.



## Fair work arrangements for our people:

- We continued the robust processes we have in place to ensure people who work at our sites are legally entitled to do so. This includes confirmation of citizenship or the right to work in the relevant jurisdiction, and that minimum age requirements are met.
- As an ongoing demonstration of our commitment to our peoples' right to freedom of association, we have enterprise or collective agreements with our factory employees at the majority of our sites. During the reporting period, we successfully concluded renewals of the enterprise agreements for factory employees at our sites in Virginia and Marleston.
- We don't use "gig economy" models of employment in our business. Only a small proportion of our workforce are casual employees<sup>4</sup>.
- Our payroll time and attendance software provider was subject to a cyber-attack that disabled its systems for a number of months during the reporting period. Thankfully, no personal information relating to our people was compromised as a result of the attack. However, the system outage complicated our ability to correctly record the time worked by employees at our Australian manufacturing sites. We put internal controls in place to ensure these employees were correctly paid during the outage. We subsequently also engaged a third party accounting firm to undertake a reconciliation of our wage payments during the outage to ensure they were correct.



4. In Australia, we have 175 casual employees within The Arnott's Group, including Good Food Partners.



## Key Risks Identified

In our first reporting period, three years ago, we undertook a comprehensive review of modern slavery risks in our operations and supply arrangements.

We reported on a number of modern slavery risk areas identified through that process, and the actions we have taken to address and mitigate the relevant risks.

Since then, our focus has been on reinforcing our responsible sourcing expectations among our existing suppliers and minimising modern slavery risks when engaging new suppliers. We also continue to take action to address modern slavery risks as they are identified.

Examples from this reporting period follow on:

-  Palm Oil
-  Tomato Paste
-  Cocoa
-  Solar Panels

### Palm Oil

In our previous Modern Slavery Statements, we discussed the risks of modern slavery in relation to palm oil. The Arnott's Group's Australian business sources certified sustainable palm oil from peninsular Malaysia from land which has been used to produce palm oil or other agriculture crops. Our palm oil supplier:


- Follows free prior and informed consent (FPIC) principles in the palm oil supply chain. This means there is informed, non-coercive, negotiations between it and local communities prior to oil palm farms being established and developed.
- Has controls in place to ensure its supply chain is free from forced labour.
- Operates a smallholder program to ensure it deals with a range of growers of different size. Smallholder farmers account for roughly 40 per cent of its palm oil supply.

During this reporting period, we became aware through extensive media coverage that the supplier of palm oil used in our instant dry soup products and quick cook pasta – manufactured by a co-packer in our Malaysian business – had been engaging in forced labour practices. In line with our strong commitment to eliminating modern slavery risks in our supply chains, our Procurement team acted promptly to explore alternative palm oil supply options and to develop and implement a plan to transition to an alternative supplier as quickly as possible. The Arnott's Group no longer sources palm oil from the offending supplier. The supplier of palm oil to our Australian business, who in turn had also sourced product from the offending supplier, has also stopped doing so for the same reasons.




### Cocoa

In previous Modern Slavery Statements we have discussed the sourcing of cocoa. The Arnott's Group no longer sources cocoa from West Africa, instead it sources cocoa from Asia. Part of this cocoa is certified by the Rainforest Alliance, and certification of our total cocoa products will increase progressively over the next three to five years. In this reporting period, Good Food Partners took steps to further minimise the risks of modern slavery in the sourcing of this ingredient. The business streamlined the procurement of cocoa products, reducing the number of suppliers from six to two. Both suppliers are Sedex members and supply UTZ certified cocoa products.



### Tomato Paste

In our Modern Slavery Statement for the 2019-2020 reporting period, we noted that we had stopped sourcing tomato paste from a geographic region which human rights organisations associate with high risks of modern slavery. During this reporting period, we continued to source tomato paste from other regions despite continued global shortages of tomato paste supplies. We did source tomato paste from a supplier which has operations in the high risk geographic region, but that tomato paste was sourced from other regions. Based on the supplier's SMETA audit reports, we are assured that no modern slavery concerns have been identified in relation to this supplier and the site we are sourcing from, noting its association with a high risk geographic region.



### Solar Panels

We published The Arnott's Group Sustainability Report during the reporting period which outlined the progress we have made in creating a more accountable and transparent supply chain.

One major sustainability project we reported on having commenced was the installation of solar energy systems at some of our sites in Australia. During the reporting period, the risks of modern slavery in the manufacture of solar panels was widely reported in the media.

We worked closely with our solar panel provider to ensure the solar panels to be installed on our sites would not be sourced from any manufacturers known or reported to be engaged in modern slavery practices. As part of this, we obtained contractual commitments from our solar panel provider to accept a Sedex relationship with us, to undertake

annual SAQs, and to confirm that no form of modern slavery is used either in its business or by its contractors or subcontractors.

In addition to these contractual commitments, our provider shared data in relation to their solar panel manufacturer's position on modern slavery issues. We sighted the manufacturer's annual sustainability report, which included reporting against GRI Standards. The manufacturer reported that it does not have any operations or suppliers in which the right to freedom of association and collective bargaining may be at risk, that are highly susceptible of child labour, or that are at significant risk for incidents of forced or compulsory labour or child labour. The sustainability report was independently assured by SGS.





## COVID-19 Impacts & Supply Chain Disruptions

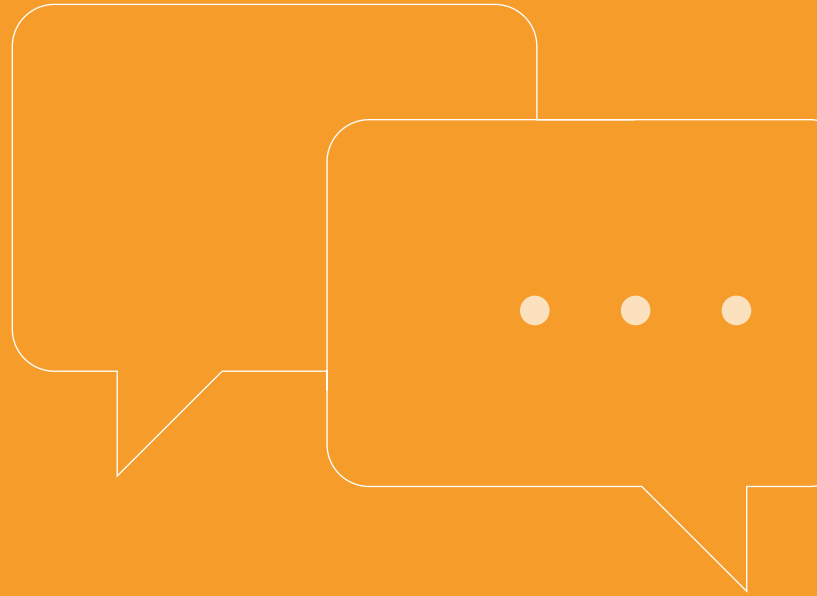
Like most other businesses, The Arnott's Group continued to weather the impacts of COVID-19 as well as supply chain disruptions during the reporting period.

Again, notwithstanding these external factors which put pressure on our business, we remained true to our commitment to responsible sourcing.

Recognising the major direct and consequential impacts of COVID-19 on our suppliers, as well as the additional pressures on our own resources and limitations on site access, we continued to hold off our plans to require our key suppliers to undertake SMETA audits during this reporting period.



# 03



## Consultation & Approval

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### Our Customers and Non-Government Organisations

In addition to working with our suppliers, we consult with our customers and other organisations about the risk of modern slavery in our supply chains.

Our major customers are committed to ensuring their supply chains are free from modern slavery. We work with these customers to answer their questions about our business and we submit to independent ethical audits of our facilities by our customers.

We also work with non-government organisations such as the Rainforest Alliance and the Roundtable on Sustainable Palm Oil (RSPO). These organisations have people working in countries with high risks of modern slavery and provide us with valuable insights about how to responsibly source ingredients in these countries.



### Our Modern Slavery Working Group

The Arnott's Group Modern Slavery Working Group has continued to lead our modern slavery elimination efforts. The Working Group is comprised of representatives from our headquarters in Australia, our operations in Asia, and also from the Good Food Partners business. Having a working group with representatives from all parts of our business ensures we have a comprehensive, whole of business view of the modern slavery risks for The Arnott's Group. It has also ensured a consistent approach to our risk mitigation efforts within the business, including the implementation of our policy documents, minimum supplier expectations, supplier contract terms and training program.

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### Non-Operating Reporting Entities

Our consultation process did not involve the non-operating entities owned or controlled by the reporting entities. Many of the non-operating reporting entities exist only as holding companies and none of them source products.

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### Reporting to the Board

All reporting entities in The Arnott's Group ultimately report to Board of Snacking Investments Holdco. The Board's Audit, Risk and Compliance Committee continues to meet at least four times a year, providing a forum for the reporting of key risks affecting the business. The transparent reporting of these risks empowers the Committee to provide direction on our modern slavery risk management strategy as needed.

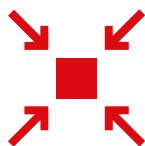
# 04



## Measuring Our Effectiveness

The Arnott's Group remains committed to identifying, mitigating and eliminating all forms of modern slavery in our supply chains. As part of this, we continued to assess the effectiveness of our actions on reducing modern slavery practices over this reporting period.





## Progress over the Reporting Period

### The Arnott's Group, excluding Good Food Partners

During the reporting period, we adopted the same key measures of effectiveness as we did for previous reporting periods, being:

- **The number of our suppliers who confirmed their agreement to comply with our RSSC or their equivalent code:** Ninety-nine per cent of active suppliers of direct product inputs for our Australian business had either confirmed agreement to our RSSC or undertaken to comply with their own comparable responsible sourcing code. We are continuing to target 100 per cent for the next reporting period and beyond. For our businesses in Asia, our RSSC was agreed by:
  - 83 per cent of packaging suppliers and 89 per cent of raw material suppliers (representing 110 of 123 direct material suppliers) to our Indonesia business.
  - 96 per cent of packaging suppliers, 52 per cent of ingredient suppliers and 100 per cent of co-manufacturers (representing 70 of 103 direct material suppliers) to our Malaysian business.

**Good Food Partners** completed SAQs for all of its sites. We are pleased to report that no modern slavery concerns were identified through the SAQs.

- **The number of our suppliers who are on the Sedex platform and with whom we have a Sedex relationship:** As at the end of the reporting period, 116 of the 141 suppliers of direct inputs to our Australian business were Sedex members. Of those, 94 suppliers had accepted our relationship request on the Sedex platform. We have accepted relationships on Sedex with suppliers who account for 98 per cent of our total spend on direct inputs. This is a significant increase from 57 per cent in the previous reporting period and well ahead of our target of 96 per cent for the next reporting period.

We also had reference to additional measures of effectiveness, being:

- **The number of our suppliers who have completed SAQs:** The number of direct input suppliers to our Australian business who completed a SAQ also significantly increased during the reporting period to include suppliers who account for 93 per cent of our total spend on direct inputs. This is up from 50 per cent in the previous reporting period and well ahead of target of 87 per cent for the next reporting period.
- **The findings of SAQs on our sites:** As noted earlier, the completed SAQs for our sites are published on Sedex and are available for viewing by Sedex members with whom we have a relationship. We are pleased to report that these did not indicate any concerns in relation to modern slavery.



# 05



## Our Ongoing Commitment

The Arnott's Group is again proud to have achieved many of the goals we set to address modern slavery risks in our operations and supply chain, during this reporting period. As ever, we are committed to continually improving our operations and supply chain processes and practices to eliminate modern slavery risks.



## We anticipate our future actions will include:



Implementing a new supplier management system which will:

- Automate some of the key requirements of our Modern Slavery Guidelines, and strengthen our internal modern slavery risk management controls;
- Allow us to more readily identify high risk suppliers so that we can take prompt action where needed; and
- Enable ready access for our suppliers to key relevant resources, such as our anonymous reporting platform.



Continuing to educate our people on modern slavery risk management as we implement new systems and processes.



In the spirit of holding ourselves to the high standards we expect of our suppliers, and demonstrating this to our customers we undertook SMETA audits of more of our manufacturing sites across Australia.



Leveraging our annual supplier survey process to informally audit our key suppliers' compliance with our minimum supplier expectations, including compliance with our RSSC.



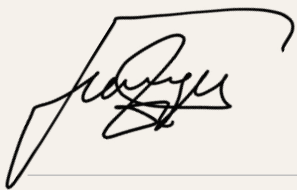
Requiring our key suppliers identified as high risk to conduct audits of their business where we deem necessary to validate their compliance with our responsible sourcing requirements and standards, where feasible.



Continuing to promote our anonymous reporting platform to our suppliers at appropriate opportunities, such as at The Arnott's Group annual Supplier Forum.

**APPROVAL**

This Statement was approved by the Board of Snacking Investments Holdco Pty Ltd (ACN 634 908 482).



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**George Zoghbi**  
Director, Snacking Investments Holdco Pty Ltd



