



MODERN SLAVERY STATEMENT 2021-2022

Introduction

This is Allied Pinnacle Pty Limited's (ABN 85 161 203 005) third Modern Slavery Statement provided under the Commonwealth *Modern Slavery Act 2018* ('Act').

The purpose of this statement is to outline Allied Pinnacle's approach to establishing and ensuring robust frameworks and processes are in place to minimise the risk of modern slavery in our business operations and supply chain.

As an annual statement, we also aim to report on progress with identified actions and any material changes to our operations that may impact the level of modern slavery risk.

Allied Pinnacle recognises that modern slavery can occur in many forms, including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

We are fully committed to the highest ethical standards across our business and will not tolerate or support any form of modern slavery within our operations or supply chain.

About Allied Pinnacle

We bake the future from flour every day and have been doing so for over 100 years.

With over a 1,000 employees, we are focused on our vision to be the flour, bakery ingredients and baked goods business partner of choice across Australia and New Zealand.

This will be achieved by providing market leading solutions from grain to table, with the best quality, lowest cost, and seamless service delivered by the most capable and engaged team in a sustainable way.

Organisational Structure, Operations and Supply Chain

During the period of this report, there have been no changes to our organisational structure, operations or supply chain that would materially impact the level of modern slavery risk.

Allied Pinnacle is wholly owned by Japan's Nisshin Seifun Group.

Within Australia, Allied Pinnacle consists of a single operational entity.

Allied Pinnacle operates across three main product categories: Flour, Bakery Ingredients (Pre-mixes, Wet and Traded ingredients) and Prepared Bakery (including breads, cakes, cookies, pastries, croissants, muffins, donuts, bagels); with a customer base that includes industrial manufacturers, independent bakeries, food service, retail and export.

Allied Pinnacle manufactures and distributes its products from mills, bakeries and distribution centres located in Australia, utilising wheat from our key growing regions and other raw materials sourced from both national and overseas suppliers.

In addition to its directly employed workforce, Allied Pinnacle's operations are supported by labour hire, short-term contractors, and 3PL/4PL providers as required.

Potential Risks of Modern Slavery

As reported previously, we recognise that key risk indicators are commonly associated with the food and beverage industry, including:

- prevalence of base-skilled workers, with high population of migrant backgrounds;
- common utilisation of third-party labour arrangements;
- high-risk product and service categories (eg raw material supply); and
- operations within high-risk geographies (eg areas where human rights and other regulatory frameworks are weak).

Allied Pinnacle owns and operates its own manufacturing and distribution facilities within Australia. As a locally based, highly regulated and auditable compliance environment (for example, in respect of prescribed pay rates, working conditions and safe systems of work), Allied Pinnacle's 'finished' product supply chain represents a very low level of modern slavery risk. In addition, during the period of this report, Allied Pinnacle has commissioned a new payroll and timekeeping system to enhance its systemic compliance controls.

As previously reported, Allied Pinnacle's operations are supplemented by contract labour and services. During the period of this report, Allied Pinnacle has had to enlarge its range of labour-hire suppliers to address labour shortages, however such arrangements remain with established and reputable local suppliers. Further, during this time, Allied Pinnacle has employed a dedicated Workforce Planner to manage these external partnerships and ensure compliance with Allied Pinnacle's requirements.

Within its external supply chain, Allied Pinnacle's highest area of modern slavery risk lies in the area of raw materials. While Allied Pinnacle deals with reputable suppliers, the extended and often offshore nature of raw material supply may mean the originating source/supplier is not readily and directly known or visible to Allied Pinnacle.

Actions to address Modern Slavery Risks

Allied Pinnacle has in place formal policies that promote ethically and legally compliant business conduct. These policies, which mitigate the risk of human rights violations that support modern forms of slavery, include:

- Employee Code of Conduct;
- Equal Employment Opportunity & Workplace Behaviour Policy;
- Ethical Business Conduct Policy;
- Social Responsibility Policy; and
- Whistleblower Policy.

The Whistleblower Policy is further enabled by an independent 'hotline' that provides anonymous reporting of unethical or improper business conduct or practice.

Allied Pinnacle's approach is supported by an ethos of strong community citizenship, which includes partnerships with:

- **Foodbank**, Australia's largest hunger relief organisation, helping to fight hunger and raise awareness of the issue of food insecurity in Australia;
- **CareerSeekers**, a national non-profit organisation that creates internship opportunities for Indigenous university students;
- **CareerTrackers**, supporting asylum seekers and refugees to establish or re-start their professional careers in Australia; and
- **Animals Australia**, in support of our policy to use 100% cage-free eggs by 2025.

Allied Pinnacle's commitment to corporate citizenship will be further embedded into its five-year 2022 Sustainability Strategy and ESG Action Plan, currently under development.

Allied Pinnacle has an approved supplier list and only these suppliers may be used for any stage of production. Approved suppliers (and any new supplier) are required to act and conduct their business consistent with our ethical and social responsibility policies, including:

- No child or forced labour;
- Compliance with labour laws applicable to the jurisdiction;
- Employee rights of freedom of association and to bargain in accordance with applicable law; and
- Respect for human rights through appropriate non-discriminatory policies and practices.

Allied Pinnacle has zero tolerance for suppliers who breach these standards and will terminate arrangements with any supplier who fails to immediately and satisfactorily remedy issues of modern slavery.

Assessing the effectiveness of our Actions

We monitor the effectiveness of our actions to remove the risk of modern slavery from our operations and supply chain by:

- Investigating any reports received from employees, the public, or law enforcement agencies that indicate the existence of modern slavery practices;
- Having our policies, procedures and practices subject to external ethical auditing. Allied Pinnacle is subject to SMETA (Sedex Members Ethical Trade Audit) auditing, which assesses our operations against Labour, Health & Safety, Environment and Business Ethics standards;
- Remediation and management reporting of breaches identified by internal/external audit programs or Whistleblower sources;
- Engagement with stakeholders on modern slavery issues or concerns, including procurement team members, suppliers, third-party auditors and customers; and
- Periodic corporate social responsibility risk assessment of our supplier base.

Progress on continuous improvement

During the latest reporting period:

- Allied Pinnacle has successfully completed SMETA assessments across multiple sites. While no material concerns were identified, minor process improvements were implemented;
- In the ordinary course of reviewing contract labour and service providers, our procurement team has continued to assess their regulatory compliance and potential Modern Slavery risks. Given the engagement of additional labour-hire service providers, we have mitigated any additional risk through the employment of a dedicated Workforce Planner to oversee external relationships and labour supply;
- We have progressed with re-assessment of our supplier base (conducted triennially), to update and review their current policies and practices inclusive of ethical trading requirements; and
- Commissioned a new payroll and timekeeping system, which will reinforce existing controls regarding compliance with labour regulatory requirements.

Our Future Commitments

Over the next reporting period, our key focus areas for continuous improvement will be:

- Extending our timekeeping system to core labour-hire suppliers to provide improved monitoring and reporting of hours and compliance;
- Completing the triennial supplier assurance process;
- Finalising our five-year 2022 Sustainability Strategy and ESG Action Plan;
- As a key enabler of our Strategic Plan, reviewing our Corporate Values and Behaviours to ensure all stakeholders continue to reflect and model conduct consistent with the highest ethical and social responsibility standards.

This Modern Slavery Statement was approved by the Board of PFG Topco1 Pty Limited (ABN 35 604 317 875) at its meeting of 31 August 2022, as the principal governing body of Allied Pinnacle Pty Limited.



David Pitt
Chief Executive Officer