

Introduction	Operations and supply chain	Policy and management	Identifying and managing risks	Grievance mechanisms
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Modern Slavery Statement 2023

Reporting Year

Associated
British Foods
plc

Introduction

Associated British Foods plc (“**ABF**”) is a diversified international food, ingredients, and retail group with a revenue of approximately £19.8 billion, 133,000 employees and operations in 55 countries across Europe, Africa, the Americas, Asia, and Australia. ABF has a devolved operating model across our five business segments of Grocery, Sugar, Agriculture, Ingredients and Retail.

This modern slavery statement is a joint report covering ABF’s Australian and New Zealand group of companies¹ with the relevant reporting entities being AB Mauri ROW Holdings Pty Ltd (ABN 12 115 524 886), AB Food & Beverages Australia Pty Ltd (ABN 93 100 637 849), Food Investments Pty Limited (ABN 85 008 426 177) and their subsidiaries. For a full list of ABF subsidiary undertakings, please see note 29 of the notes to our financial statements in the ABF 2023 Annual Report and Accounts¹.

These entities shall be referred to as “**ABF’s Australia Group**” for the purposes of this statement.

ABF’s Australia Group businesses **have taken clear steps** in this reporting year to address modern slavery risk and we are committed to further improving our practices for future reporting years.

In addition, this statement covers the operations of New Food Coatings Pty Ltd, trading as Newly Weds Foods (Australia) (“**NWF**”), a company 50% owned by Food Investments Pty Ltd and 50% owned by Newly Weds Foods Inc (a company registered in the United States of America).

This statement was prepared in consultation with each of the relevant reporting entities with a steering committee formed from employees of each of the reporting entities and/or its key subsidiaries. Working groups comprising relevant subject matter experts were also formed within the relevant reporting entities and key subsidiaries with their due diligence findings and any modern slavery issues being discussed during steering committee meetings.

1. <https://www.abf.co.uk/content/dam/abf/corporate/oar-and-rr-2023/oar/abf-annual-report-2023.pdf.downloadasset.pdf>

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In summary, the key developments for ABF's Australia Group and NWF this reporting period have been:

- Jordans Dorset Ryvita ("**JDR**"), as part of the UK's grocery division of ABF, has continued to work on the development of a central data management team to embed procedures to monitor supplier engagement via the use of SEDEX software and to provide accurate data, which is now distributed monthly to relevant management teams. A key use of this data is to provide status updates on non-conformances which are derived from ethical audits. These audits allow the businesses to engage with their suppliers to resolve identified non-conformances effectively and in a timely manner.
- George Weston Foods' ("**GWF**") businesses have made a collective decision to partner with SEDEX, and to require their supply chains to provide relevant information via SEDEX surveys, as a first step to developing and implementing an audit and grievance process for GWF business supply chains. GWF is also exploring with JDR and other ABF businesses the development of a central data management team.
- In addition, over the past year, JDR has, along with other ABF Group entities not in scope, contracted an independent third-party ethical consultant to undertake a review of all businesses. Policies and management procedures are assessed against best practice specified by the Organisation for Economic Cooperation and Development ("**OECD**") and Food and Agriculture Organization ("**FAO**") in their 'Five Steps Guidelines for Due Diligence in the context of Agricultural Supply Chains.' As a result of this assessment, ABF businesses are amending their policies to appropriately address responsible sourcing, environmental impacts, and remediation.

- The Twinings Group of which AB Food & Beverages Australia Pty Ltd ("**Twinings Australia**") forms part, have pioneered a '*Community Needs Assessment*,' a detailed holistic and participatory framework which is used in communities connected to the tea gardens from which the Twinings Group sources. This assessment is carried out by the Twinings Group to provide the business with greater awareness of the conditions and risks facing workers, farmers and communities associated with the tea gardens.
- NWF is a member of SEDEX, has sent out supplier questionnaires and NWF's suppliers are asked to sign and agree to a code of conduct prior to engagement.

ABF's diversity means that its operations are widespread, and supply chains are far-reaching and complex. ABF's Australia Group remains committed to respecting human rights across operations, supply chains and products.

As part of ABF which has international businesses with far-reaching and complex supply chains, ABF's Australia Group recognise the important role we can play in addressing the risks of forced labour.

ABF expects its businesses to carry out due diligence on the risks of forced labour in their own operations and supply chains and to provide remediation to those who have been impacted where this is appropriate. ABF expect our businesses to apply the principles set out in the ABF Group Supplier Code of Conduct, including our zero tolerance for forced labour and modern slavery, and some of them do this through their own equivalent supplier codes of conduct.

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ABF's Australia Group – Operations and Supply Chain

In Australia the entities in ABF's Australia Group comprises:

- George Weston Foods ("**GWF**") which includes the Tip Top, DON, Mauri, Jasol and Yumi's businesses.
- Twinings Australia imports, manufactures, and distributes a range of teas, infusions, coffees, malt drinks and hot chocolates under the Twinings, Ovaltine and Jarrah brands.
- AB World Foods Pty Ltd ("**ABWF Australia**"), which imports, markets, and distributes a range of international sauces, pastes, pappadums, meal kits and chutneys under the Patak's brand.
- The Jordans and Ryvita Company Australia Pty Ltd ("**JDR Australia**") imports, manufactures (via a third-party manufacturer), markets and distributes a range of cereals, crisp breads, and crackers under the Jordans, Dorset Cereals and Ryvita brands.

In respect of NWF:

- New Food Coatings Pty Ltd, trading as Newly Weds Foods, is a manufacturer of food ingredients, employing close to 700 people across Australia, New Zealand, Thailand, and the Philippines.
- Newly Weds Foods supplies breadcrumb coatings, batters, seasonings, sauces, marinades and functional ingredients to poultry, seafood, meat, smallgoods and pasta processors.

NWF's head office and main manufacturing plant is in Sydney, with a second Australian plant in Perth and subsidiary plants in New Zealand, Thailand and Philippines which supply local and export markets.

Description of ABF's Australia Group supply chains. **GWF**

GWF has over 4,000 supplier vendors and service providers with the majority of these being Australian or New Zealand based.

GWF's Mauri ANZ division purchases grain, grain by-products and bakery ingredients. Mauri procures most of its grain from Australian farms.

Ingredients for Mauri ANZ are primarily sourced from Australia, China, Netherlands, USA, New Zealand, India, and Malaysia (from a combination of Australian and New Zealand businesses).

Packaging for Mauri ANZ is primarily sourced from Australia, India, China, Indonesia, and New Zealand (from a combination of Australian and New Zealand businesses).

The major ingredient for the DON business division is meat which is sourced from Australia, USA, Canada, Belgium, Denmark, The Netherlands, UK, and Ireland.

Other ingredients for DON are purchased directly or via Australian distributors who source from overseas countries including China, USA, Canada, Philippines, Malaysia, Thailand, Germany, Denmark, Turkey, Morocco, Israel, Brazil, Poland and India.

For GWF's Tip Top division, the major ingredient is flour, sourced from Mauri ANZ in Australia and New Zealand. The Tip Top business sources other ingredients from countries such as Australia, China, Malaysia, India, Turkey, USA, Italy, Belgium, and the Netherlands.

Improvers, yeast (except in Western Australia) and premixes are sourced from Mauri ANZ in Australia and New Zealand.

Tip Top's packaging is sourced from Australia, New Zealand, Canada, China, and Malaysia. Tip Top's equipment is purchased from our long-established local partners, who are currently providing equipment manufactured predominantly in Europe, South Africa and North America.

GWF's Yumi's business sources most ingredients from Australia. Other products/ingredients are sourced from South Africa, Vietnam, Greece, Israel, China, Italy, and Turkey. The vast majority of inputs are sourced in Australia however, tahini is currently sourced from Turkey with a second supplier from Israel being onboarded. Avocado is sourced from South Africa; main lids are sourced from Israel and cashews are sourced from Vietnam.

GWF's Jasol division buys almost all chemicals through Australian based distributors. Raw materials are purchased locally from importers who source from established manufacturers in Korea, Malaysia, China, and USA. Packaging is sourced locally within Australia. Equipment is primarily sourced from UK, USA, and Taiwan.

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Twinnings Group

The Twinings Group comprises an international tea company with headquarters in the UK and a presence in many countries. The Twinings Group has never and does not currently own any tea plantations.

Instead, the Twinings Group buys tea from producers around the world and currently sources tea from 140 tea gardens, which are carefully selected based on quality and ethical standards. The Twinings Group's herbal and fruit infusions are sourced from over 100 different plants which are grown in more than 30 countries around the world. For the Australian and New Zealand markets, Twinings tea is packaged at our own site in Poland.

Twinnings' Australian manufacturing business also sources other ingredients and finished products from countries such as Brazil, Columbia, China, Malaysia, India, Poland, Thailand, France, Germany, and Australia. It sources most of its packaging from Australia and one form of packaging from Vietnam.

Further information can be found at:

<https://sourcedwithcare.com/pages/sourcing-map>.

AB World Foods

As a world food business, ABWF sources ingredients, packaging, and finished goods from numerous regions around the world, including Europe, Asia, and the Indian sub-continent, working with a diverse portfolio of suppliers, a large proportion of which are in the agricultural sector. The business' extended global supply chains include purchasing directly from processing sites or via approved agents.

JDR Australia

JDR Australia imports finished, packaged product from our UK based factories and engages third party manufacturers in Australia to supply finished product under JDR brands.

NWF

New Food Coatings Pty Ltd, trading as Newly Weds Foods, is a manufacturer of food ingredients, employing close to 700 people across Australia, New Zealand, Thailand, and the Philippines. Supplying breadcrumb coatings, batters, seasonings, sauces, marinades and functional ingredients to poultry, seafood, meat, smallgoods, and pasta processors.

Ingredients are traded from local and international traders and manufacturers and are sourced primarily from Australia, China, Europe, Turkey, USA, New Zealand, India, and Spain.

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Policy and Management

Modern slavery is a global issue and can occur in many different forms, including but not limited to, forced labour, child labour and human trafficking. Recent figures, published by the United Nations in September 2022, estimate that 27.6 million people are in forced labour. This is a significant increase in the number of people globally in modern slavery compared to previous figures from 2021.

(Source: ilo.org)

ABF recognises the importance of the UN Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidelines on Responsible Business Conduct, which require businesses to have a rigorous approach to due diligence.

Embedding Responsible Business Conduct in Policy and Management

At a minimum, our businesses comply with applicable regulations related to modern slavery. Furthermore, ABF's Australia Group expect that their suppliers and representatives will comply with ABF's Australia Group's required standards.

ABF has a group 'Supplier Code of Conduct' which sets out certain values and standards. It is based on the Ethical Trading Initiative ("ETI") Base Code, and the International Labour Organization ("ILO") Declaration on Fundamental Principles and Rights at Work (introduced in 1998 and amended in 2022) which covers: freedom of association and collective bargaining; forced labour; child labour; discrimination; and a safe and healthy working environment.

ABF's Supplier Code of Conduct clearly outlines a zero tolerance of forced or bonded labour. Each of ABF's businesses is responsible for implementing the Supplier Code of Conduct and monitoring compliance with it. ABF expects all of its businesses' suppliers to comply with the Supplier Code of Conduct and to seek to develop relationships with their own supply chains consistent with principles set out in the Supplier Code of Conduct.

The Supplier Code of Conduct includes the following material:

1. Employment is freely chosen.
2. Freedom of association and the right to collective bargaining are respected.
3. Working conditions are safe and hygienic.
4. Child labour shall not be used.
5. Land acquisition.
6. Living wages are paid.
7. Working hours are not excessive.
8. No discrimination is practised.
9. Regular employment is provided.
10. No harsh or inhumane treatment is allowed.
11. Confidentiality.
12. No bribery or corruption will be tolerated.
13. Environmental management.
14. Quality.
15. Audit and termination of agreements.

Specifically on the risks of modern slavery (forced labour), the Supplier Code of Conduct includes the following requirements:

- There must be no forced or compulsory labour in any form, including bonded, trafficked, or prison labour; and,
- Workers must not be required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after providing reasonable notice.

ABF's Australia Group are also aware that often the signs of forced labour can manifest through a range of factors so that a confluence of indicators may result in forced labour, rather than one single indicator.

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Many of ABF's Australia Group businesses have developed and/or implemented additional policies that support and strengthen the implementation of the 'Supplier Code of Conduct,' often through consultation and engagement with stakeholders and third-party technical experts.

- GWF's 'Responsible Sourcing Code of Conduct' <https://www.gwf.com.au/wp-content/uploads/2021/03/GWF-Supplier-Code-of-Conduct.pdf> which includes a requirement that suppliers and their suppliers develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable him or her to attend and remain in quality education until no longer a child.
- The Twinings Group's 'Sourced with Care'² programme was launched in 2016 to improve the lives of people growing our herbs and tea. Since 2018, the Twinings Group also publishes its tea sourcing list. By being transparent about who and where we source from, we endeavour to drive collaboration and tackle industry challenges. In 2023, the Twinings Group also published their human rights report, which describes the steps taken to embed human rights in their business and respect human rights in their supply chain.

- Jordans Dorset Ryvita has developed a Preventing Hidden Labour Exploitation policy to support the recruitment and employment of permanent and temporary agency employees across their own operations and supply chains. It is important that workers, and those most at risk of modern slavery, can access and understand our policies and their workplace rights.
- NWF has developed an ethical sourcing framework that includes the following elements:

- NWF is now a member of SEDEX, has sent out supplier questionnaires and has asked their suppliers to sign and agree to NWF's Code of Conduct.

NWF identifies modern slavery risks via the following:

- country risk review using the modern slavery index to identify countries at risk;
- ABF/GWF feedback on areas that have been identified as higher risk at an ABF level, for example tomato paste; and
- Monitoring media and news information.

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Identifying and Managing Risks

ABF's Australia Group businesses within this statement are responsible for mapping their operations and supply chains to identify where their key risks are present. Some of ABF's Australian Group businesses have published interactive 'maps' which are updated regularly and show where products are harvested, processed, and manufactured, dependent on the specific business.

Businesses assess the potential and actual risks of modern slavery within their operations and supply chains and prioritise those which are most salient for example, those with the most severe or negative impact. This may include the country of origin, the product or industry characteristics such as seasonal cycles, and workforce characteristics such as migrant workers.

Our diversified business model enables each of our businesses to choose a suitable approach to take, based on its specific supply chains and the nature of its supplier relationships. In many cases we find that suppliers have their own programmes that meet our expectations in this area, but where this is not the case our businesses seek to leverage or collaborate to drive change.

To do this, our businesses refer to a range of credible external and internal resources such as Verisk Maplecroft's risk assessment tool which provides country risk data on over 200 commodities.

Further, GWF businesses are in the process of implementing the Supplier Ethical Data Exchange (SEDEX), which utilises data reported by industry bodies, in-depth site and supply chain investigations and assessment, stakeholder reports including those from intergovernmental organisations, civil society and human rights watchdogs, as well as intelligence gathered from our teams in our operations and sourcing locations.

As ABF's Australia Group, we engage regularly across our businesses to share information and learning on cross-cutting and critical issues, particularly where risks are systemic, severe, and may require enhanced due diligence. This has included, for example, human rights issues in Xinjiang Uyghur Autonomous Region (XUAR) and Myanmar, and the exploitation of agency labour and migrant workers.

ABF's Australia Group businesses work with a diverse range of suppliers from large businesses to smallholder farmers. Most of them use the United Nations Guiding Principles on Business and Human Rights (UNGPs) as a reference point to guide their activities in implementing human rights due diligence processes. The OECD's Guidelines for Multinational Enterprises, Due Diligence Guidance for Responsible Business Conduct and various sectoral guidance documents all provide valuable models and reference material.

Our Group Supplier Code of Conduct <https://www.abf.co.uk/about-us/corporate-governance/policies> is an essential requirement of the responsible business conduct of our businesses. This document is based on the core conventions of the International Labour Organization (ILO) and on the Base Code of the Ethical Trading Initiative. All businesses within the ABF Group are responsible for managing their relationships with suppliers and satisfying themselves that they operate in line with the principles contained in the Group Supplier Code of Conduct.

We support the objective of 'Decent Work' as defined by the ILO and, through the application of our Code of Conduct in our many global supply chains, we recognise our potential contribution to SDG 8 – Decent Work and Economic Growth.

In line with our ABF Supplier Code of Conduct, our businesses prohibit all forms of modern slavery, including forced labour and human trafficking. Alongside this statement ABF publishes a Modern Slavery Statement in accordance with the UK Modern Slavery Act 2015.

GWF's Responsible Sourcing Code of Conduct includes the same requirements as the ABF Supplier Code of Conduct.

Human rights due diligence across ABF's Australia Group and NWF

In their application of the ABF Supplier Code of Conduct, our businesses continue to develop and improve human rights due diligence processes in their supply chains.

Our key risks

Within GWF, each business has identified key risks based on our processes described above.

Tip Top has identified raisins and sultanas sourced from Turkey, sesame seeds from India, starches from Thailand, various materials purchased from China, ingredients containing palm oil and packaging sourced from Malaysia. In addition, Tip Top has identified contingent labour used in bakeries in Australia as a risk, which is mitigated by working only with trusted, locally licenced providers.

Mauri has identified cocoa and emulsifiers sourced from Malaysia and starch products from Thailand as high-risk focus areas. Mauri is registered with the Rain Forest Alliance for all cocoa supply and work with Tier 1 manufacturers in Malaysia and Thailand and have requested updated SMETA audits to be completed.

The key risk identified by Yumi's is products from Turkey, principally tahini.

In all these cases, in addition to specific measures mentioned above, businesses communicate the Supplier Code of Conduct with suppliers, and are now working to register suppliers onto the SEDEX system.

Our DON Smallgoods business has identified product from the USA, Canada, and Denmark. Dons hold regular meetings with suppliers in these countries to communicate their requirements pursuant to the Responsible Sourcing Code of Conduct.

For Newly Weds Foods, the key risks are ingredient Products from India, Thailand, and China.

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Grievance mechanisms and remedy

ABF encourages ABF's Australia Group to have an open culture in all dealings between employees and people with whom we and our businesses come into contact.

Honest communication is essential if malpractice and wrongdoing are to be dealt with effectively. ABF Groups 'Speak Up Policy' sets out guidelines for the employees of ABF and its businesses who wish to raise issues in confidence; these could include forced labour concerns. We provide an external advisory service for all staff, including casual or agency staff, and make every effort to protect the confidentiality of those who raise concerns.

Consultation and Transparency Stakeholder Consultation

Different stakeholders including NGOs, trade unions, governments, other businesses (subject to all relevant competition and anti-trust laws) and industry bodies inform the ABF approach to human rights due diligence. We work with these organisations due to their expert knowledge and we acknowledge their contribution.

Transparency is important. Some of our businesses – including the Twinings Group – publish global sourcing maps and provide information about their processes, progress and challenges through corporate reports, websites, stakeholder engagement activities and submissions to benchmarks.

Consultation and Collaboration across ABF businesses

ABF's Australia Group, while in keeping with our organisational philosophy of making decisions in the best needs of the business, nonetheless recognise the need for collaboration on a variety of ethical sourcing issues.

GWF

GWF has developed several avenues for its businesses to collaborate both within GWF and across ABF:

- i. GWF Ethical Sourcing Working Group - formal group which will be defining GWF's ethical sourcing way forward as part of the broader GWF Environmental, Social, and Governance (ESG) approach.
- ii. GWF Ethical Sourcing Collaboration Group - forum for sharing updates and collaborating across businesses on progress, information, and developments in relation to ethical sourcing.
- iii. ABF Grocery Group collaboration - ongoing meetings with ABF Grocery Corporate Responsibility Working Group on ethical sourcing progress and discussion.
- iv. ABF/JDR collaboration on vine fruit in Turkey - participating with JDR in a project related to raisin and sultana supply chains.
- v. ABF Procurement Leadership pillar workstream on ESG focused on collaboration in relation to ethical sourcing tools, processes, best practice etc.

Twinings, AB World Foods and JDR

Australian operations of Twinings, AB World Foods and JDR are all incorporated into an ABF Grocery Group Corporate Responsible Working Group (GG CRWG), where the GG Businesses Sustainability Leads meet several times a year, to discuss the supply chain ethical agenda & governance programme. This is co-ordinated by a central ABF UK Grocery Group Sustainability Lead.

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Actions undertaken by ABF Entities in the Reporting Period

GWF

GWF has identified its raw material, packaging, finished goods suppliers and services suppliers (including security, cleaning workwear, temporary labour and logistics providers) as its focus. It has begun using Supplier Ethical Data Exchange (“SEDEX”) to understand the risks associated with tier one and relevant tier two priority suppliers’ sites in these focus areas.

Other key developments at GWF include the first full year of work for its Ethical Sourcing Working Group across all businesses in Australia. GWF’s achievements in the year include progressing our strategy for implementing supply chain due diligence, and with that the development of an audit programme and grievance mechanism.

Over the past year, GWF has worked with our sister companies in ABF’s UK Grocery segment of businesses to work on the development of a central data management team to embed procedures to monitor supplier engagement with SEDEX and provide accurate data, which is now distributed monthly to management teams. A key use of this data is to provide status updates on non-conformances derived from ethical audits to allow the businesses to engage with their suppliers to resolve them effectively and in a timely manner.

A key aim for GWF and its businesses is that all suppliers of raw materials and other key commodities to GWF will be required to complete a self-assessment questionnaire, and post details of ethical audits onto the SEDEX platform to help the division identify potential salient human rights risks, prioritise suppliers, and supply chains where additional due diligence is required. Any issues identified are then escalated to the GWF Businesses Procurement leads as well as Business unit leads within the individual business. All identified risks are continuously monitored and evaluated for improvement.

The entire system will be designed to be reviewed by the GWF Ethical Sourcing working group and in turn it reports to the GWF Sustainability Taskforce.

Across GWF businesses, there has been an initial focus in 2022 and 2023 on registering with SEDEX across all businesses, and beginning the process by which suppliers to GWF entities are registered. This is regarded within GWF as the foundation stone by which the next steps of auditing and developing grievance procedures can be undertaken.

Mauri has launched SEDEX and started an initial pilot. The pilot is being used to help identify areas for improvements and opportunities to streamline Mauri’s procurement and ethical sourcing processes and plans. As part of the pilot, supplier questionnaires are issued with the GWF Responsible Sourcing Code of Conduct to ensure consistency and transparency to all suppliers.

Twinings, ABWF and JDR

The Twinings Group’s approach is articulated in its Human Rights Policy. It undertakes risk assessments following the framework set out in the UN Guiding Principles for Business and Human Rights (“**UNGPs**”) to identify and prioritise salient human rights risks.

The business monitors working conditions and supports continuous improvement in some of its tier one supply base through an audit and capacity building programme, for example by implementing tailored e-learning modules for suppliers.

In its tea supply chain, the Twinings Group has pioneered a Community Needs Assessment, a detailed holistic and participatory framework which is conducted at least every three years in communities connected to 69% of its tea gardens. This assessment is carried out by the Twinings Group out to give them an awareness of the conditions and risks facing workers, farmers and communities associated with the tea gardens in the scope of the programme. Examples of activities arising from this assessment include awareness training, capacity building programmes or specific projects related to topics including financial literacy or access to water.

Since 2017, in partnership with CARE International, the Twinings Group has established Community Development Forums (“**CDFs**”) on tea gardens in Sri Lanka. CDFs provide a space for sharing, debating and dialogue between workers, management, and the wider community. Find more information about this approach in the Twinings Group’s Human Rights Update 2023.

Key Performance Indicators (“**KPIs**”) are utilised to track progress, including monitoring suppliers that have fully completed the self-assessment questionnaire, which has increased from 60% to 90% since the development of the central data management team.

Over the past year, JDR, as part of the UK Grocery division of ABF, has contracted an independent third-party ethical consultant to undertake a review of all businesses. GWF is looking at this to see if this is applicable to its businesses.

Policies and management procedures are assessed against best practice specified by the OECD and Food and Agriculture Organization (“**FAO**”) in their ‘Five Steps Guidelines for Due Diligence in the context of Agricultural Supply Chains.’ As a result of this assessment, its businesses are amending policies to cover responsible sourcing, environmental impacts, and remediation.

In 2023, – ABWF, which has significant supply chain links to Asia, along with a sister ABF company Westmill Foods – aligned to appoint a specialist ethical sourcing manager in the region and agree a specific work programme to help facilitate supply chain risk assessment and management programmes in India, Pakistan, and Thailand.

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JDR undertakes due diligence when considering taking on new suppliers and regularly reviews existing suppliers. As part of our standard contractual terms, we require all our suppliers to operate to our 'Terms and Conditions of Purchase,' which includes a specific requirement to operate according to recognised ethical business standards. We have also revised our supplier approval process to increase the levels of rigour applied to MSA risk assessment. This has the additional benefit of driving greater awareness of the importance of this issue amongst our supplier community.

In the case of NWF, there has been focus in 2022 and 2023 to registering with SEDEX as a customer and supplier and beginning the process of requiring its suppliers be registered, in the interim all suppliers are required to complete a self-assessment questionnaire and agree to the NWF Code of Conduct.

In addition, NWF is ready to roll out online modern slavery training and looking to put on an additional resource to work in this area.

All new suppliers must commit to our Code of Conduct and complete the questionnaire at onboarding. Suppliers must confirm their compliance with the NWF Supplier Code of Conduct. This includes providing documents and records to support this. NWF reviews these responses.

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Examples of Effectiveness in ABF's Australia Group – actions on Ethical Sourcing

Helping migrant workers and their families in Turkey

Jordans Dorset Ryvita and AB World Foods, along with other ABF entities Allied Bakeries and Speedibake are supporting an active and longstanding supply chain engagement programme with the Fair Labor Association (“FLA”) to review recruitment and employment practices among seasonal migrant agriculture workers in Turkey. The project supports vine fruit and hazelnut suppliers to assess the needs of workers, farmers, and labour intermediaries.

As a result of this programme, since October 2022, the businesses have engaged with their suppliers to understand the potential to develop a set of common management controls aligned to Turkish labour requirements and ensure workers in the supply chain are treated fairly. Businesses have reshaped their procurement contracts to reward the suppliers that are most engaged via the FLA project.

Rolling out ongoing support for Vulnerable Migrant Workers in Thailand

In Thailand, the Twinings Group is working with the Issara Institute to create an Inclusive Labour Monitoring (“ILM”) programme in supplier factories with high levels of vulnerable migrant workers. Issara works to provide workers with a way to raise their voice through a multilingual hotline, smartphone app and worker interviews. This work includes remediation of grievances which cover recruitment and the workplace.

GWF – Tip Top and Overseas Supply Chain Auditing

All Tip Top suppliers are required to comply with the GWF Responsible Sourcing Code of Conduct as part of contracts and terms and conditions.

To help suppliers comply with the Code, Tip Top has undertaken the following actions – often in partnership with other ABF group entities:

- i. Raisins and sultanas are sourced from Turkey – Tip Top has collaborated with JDR to address any potential issues in respect to appropriate human rights treatment.
- ii. Sesame Seeds are sourced from India – Tip Top has commenced a review using SEDEX to deepen its understanding of the existing supply chain. Tip Top has now moved to trader purchased product.
- iii. Starches are sourced from Thailand – Tip Top has initiated discussions with its suppliers during site visits and is prioritising working with long standing partners with international footprints.
- iv. For contingent labour in Australia, Tip Top is ensuring appropriate contracts and licensing is in place as required by Australian law.
- v. Where Tip Top requires ingredients containing palm oil, Tip Top requires its suppliers to have RSPO membership.

NWF identifies and deals with Modern Slavery issue in its Supply Chain

NWF also collaborate both within GWF and across ABF through the Group Ethical Sourcing Working group.

As part of their developing plan to deal with Modern Slavery, and the heightened emphasis within our business regarding ethical sourcing and Modern Slavery training, a new customer was identified that was associated with allegations of Modern Slavery. As a result, NWF ceased dealing with this customer immediately.

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The Twinings Group addressing gender-based violence and harassment (GBVH) in the tea supply chain

The Twinings Group has been providing support via mechanisms that address sexual harassment and discrimination and promote gender-equitable behaviour in its tea supply chain. In India, it has joined the 'Women's Safety Accelerator Fund,' a new programme established by IDH, the Sustainable Trade Initiative, which works to set up mechanisms which aim to prevent gender-based violence and to support women's empowerment.

Overall, relevant managers and supervisors in 40% of the tea gardens in the Twinings Group's supply chain have now been trained in strategies to assist with preventing and responding to sexual harassment and gender-based violence with the aim to train staff working at all gardens in the supply chain by the end of the 2024 calendar year.

This Modern Slavery Statement is made on behalf of ABF's Australia Group for the financial year ending 31 August 2023.

This Modern Slavery Statement was approved by the Board of Directors of the following companies:

- AB Food & Beverages Australia Pty Ltd on 29 February 2024;
- AB Mauri ROW Holdings Pty Ltd on 28 February 2024; and
- Food Investments Pty Limited on 20 February 2024.



Craig Scott

Director and Managing Director of AB Food & Beverages Australia Pty Ltd



Lorna Raine

Director, AB Mauri ROW Holdings Pty Ltd



Paul Foster

Director, Food Investments Limited