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Modern Slavery Statement 2025

Reporting Year

Associated
British Foods
plc

Introduction

Associated British Foods plc (ABF) is an international group operating in food, ingredients, and retail. With £19.5 billion in revenue, 138,000 employees, and businesses across Europe, Africa, the Americas, Asia, and Australia, ABF's five segments are Grocery, Sugar, Agriculture, Ingredients, and Retail.

ABF's Australian businesses follow the standards set out in the ABF Supplier Code of Conduct, or approved variations, and expect their suppliers to respect human and labour rights and address issues within their supply chains in line with those standards.

This modern slavery statement is a joint report for Associated British Foods plc's Australian companies, specifically AB Mauri ROW Holdings Pty Ltd (**ROW**), AB Food & Beverages Australia Pty Ltd, Food Investments Pty Limited (**FIL**), and their subsidiaries. For a complete list of ABF subsidiaries, refer to note 31 in the ABF 2025 Annual Report and Accounts.

This statement also includes New Food Coatings Pty Ltd, trading as Newly Weds Foods (**NWF**), which is jointly owned by Food Investments Pty Ltd and Newly Wed Foods LLC at 50% each.

This statement was developed with input from reporting entities and key subsidiaries through a steering committee. Working groups of subject matter experts identified due diligence findings and modern slavery risks and issues, which were discussed in steering committee meetings.

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In summary, the key developments for the ABF businesses that operate in Australia over this reporting period have been:

- Jordans Dorset Ryvita (**JDR**), as part of the UK's grocery division of ABF, have lifted the completion rate by Tier 1 and Tier 2 suppliers of raw materials and other key commodities required to complete a SEDEX self-assessment questionnaire to a completion rate of 90% in 2024/25, following an increase from 60% in 2023/24, despite changes to the questionnaire, reflecting strong ongoing engagement from suppliers.
- George Weston Foods (**GWF**) has acquired a business called The Artisanal Group (**TAG**). It is GWF's expectation that TAG will begin the process of integrating with GWF and ABF policies in respect to modern slavery and ethical sourcing from 2026 onwards, including the adoption of the GWF Responsible Sourcing Code of Conduct. Separately, GWF has updated its Supplier Code of Conduct, and its Tip Top business has over 60 suppliers now linked to us in SEDEX with 100% SAQ completion.
- Following issues identified in its Kenyan tea supply chain in 2023, Twinings developed a Gender Based Violence and Harassment (**GBVH**) Policy to help tea gardens effectively prevent and address GBVH, reduce its risks, and protect women workers. It started by rolling out the policy in Kenya and is now continuing in India, Sri Lanka and China .
- NWF with GWF are working on a new training system to be introduced late 2025 that will provide up to date training, ensure regular updates and capture training records. NWF are in the process of reviewing and updating all policies around grievance management as they move from "Whistle-blowers" to "Speak Up" .

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Operations and Supply Chain of ABF Australian businesses

In Australia, the following ABF businesses have operations:

- Under the FIL entity, is the GWF entity which includes the Tip Top, Mauri DON and Jasol businesses.
- Under the ROW entity are the Yumi's and the Artisanal Group (**TAG**) businesses (as well as other businesses with overseas operations).
- These businesses are classed as part of the grocery segment within ABF, notwithstanding that the Jasol division is largely focused on the manufacture and distribution of cleaning chemicals.
- AB World Foods Pty Ltd (**ABWF AU**), 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 AU**) imports, markets and distributes a range of cereals, crisp breads, and crackers under the Jordans, Dorset Cereals and Ryvita brands.
- Twinings Australia imports, manufacture, and distributes a range of teas, infusions, coffees, malt drinks and hot chocolates under the Twinings, Ovaltine and Jarrah brands.

In respect of NWF:

- NWF, is a manufacturer of food ingredients, employing close to 950 people across Australia, New Zealand, Thailand, and the Philippines.
- NWF supplies breadcrumb coatings, batters, seasonings, sauces, marinades and functional ingredients to poultry, seafood, meat, smallgoods and pasta processors.

NWF's main office and manufacturing plant are in Sydney, with another plant in Perth and subsidiaries in New Zealand, Thailand, and the Philippines serving local and export markets.

Description of ABF's Supply Chains

The supply chains that are operated by each of the ABF Australia Group businesses have not materially changed from the last reporting period.

GWF

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

Mauri purchases grain, grain by-products and bakery ingredients. Mauri procures most of its grain from Australian farms. The grain is sourced under Grain Trade Australia guidelines and Australian Grain Industry Code of Practice which covers industry best practice in terms of grain handling based on quality.

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

Packaging 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 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.

The major Tip Top ingredient is flour, sourced from Mauri in Australia and New Zealand. Our Tip Top business sources from countries such as Australia, China, Malaysia, India, Türkiye, USA, Italy, Belgium, and the Netherlands.

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

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

Yumi's source several key ingredients from Australia. Other products/ingredients are sourced from New Zealand, South Africa, India, Israel, China, and Türkiye. Tahini is currently sourced from Israel and Türkiye. Avocado is sourced from South Africa and main lids are sourced from New Zealand.

Jasol 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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In respect to the Artisanal Group (TAG) approximately 70% of raw materials and ingredients are sourced from within Australia, including:

- Flour (Wheat), almonds, eggs, salt, sugar, meat, select cheeses, fresh fruits and vegetables

The remaining of TAG ingredients are sourced internationally. Key sourcing regions include:

- France – Specialty ingredients (e.g., butter, flavourings, and select yeast)
- New Zealand – Dairy products (e.g., butter)
- Belgium – Chocolate and cocoa-based products

Additional ingredients such as dried fruits, condiments, seeds, colourings, and herbs are procured through distributors who source from various countries, including South-East Asia, South America, and the Middle East.

Twinings Ovaltine (Twinings)

Twinings is an international tea brand, which has been blending tea since it was founded in 1706 and its premium teas and infusions are now sold in more than 120 countries. Across decades, it has worked to build a more resilient and transparent supply chain. It sources tea from 142 gardens in seven key sourcing countries and its herbs are sourced from more than 60.

Twinings has direct relationships with the gardens and farms from which it sources its tea and buys 88% directly from producers and the rest from auctions, particularly in countries like Sri Lanka, where the system encourages brands to buy through the auction. On herbs it works with 16 carefully selected suppliers to source raw ingredients. For Australia, Twinings tea is packaged at its manufacturing facility in Poland.

Twinings' 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://twinings.co.uk/pages/sourced-with-care>

AB World Foods

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

JDR AU

JDR Australia imports finished, packaged product from its UK based factories.

NWF

NWF supplies 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, Türkiye, USA, New Zealand, India, & Spain.

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Policy and Management

ABF's Australian businesses recognise modern slavery as a global issue that includes forms such as forced labour, child labour, and human trafficking.

With international businesses and complex supply chains, ABF expects its operations to conduct due diligence, identify risks of forced labour, and provide appropriate remediation when needed.

ABF supports the UN Guiding Principles on Business and Human Rights (**UNGPs**) and OECD Due Diligence Guidelines, emphasising rigorous due diligence standards.

Embedding Responsible Business Conduct in Policy and Management

As a global group, ABF requires its businesses to comply with regulations, respect human rights and work to prevent modern slavery, and it also expects them to require their suppliers to uphold its standards.

Our 'Supplier Code of Conduct' outlines ABF's values and is based on the ETI Base Code and ILO Declaration, covering freedom of association, collective bargaining, forced labour, child labour, non-discrimination, and workplace safety.

ABF Australian businesses either use this Code of Conduct or approved variations of it, such as the GWF 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 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.

As stated above, some of ABF Australia businesses have developed 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 has published a 'Supplier Code of Conduct' <https://www.gwf.com.au/wp-content/uploads/2021/03/GWF-Supplier-Code-of-Conduct.pdf> which includes similar requirements to that of the ABF Supplier Code of Conduct.
- Twinings 'Sourced with Care' programme was launched in 2016 to help improve the lives of people growing their herbs and tea. It is aligned with its human rights policy, which underpins a commitment to conduct business with integrity and to respect human rights. Since 2018, Twinings has published its tea sourcing list, as being transparent about who and where it sources from, it aims to drive collaboration and help tackle industry challenges. (<https://www.sourcedwithcare.com/en/>)
- 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. The policy was drafted in accordance with guidance from Stronger Together, an expert organisation that provides businesses with training, resources, and collaborative programmes on responsible recruitment to prevent labour exploitation within supply chains. It is also important that workers, and those most at risk of modern slavery, can access and understand our policies and understand their rights within the workplace.
- NWF has developed an ethical sourcing framework that includes the following elements:
 - NWF is now a member of SEDEX, have sent out supplier questionnaires and have asked their suppliers to sign and agree to a code of conduct.
- NWF identifies modern slavery risks via the following:
 - country risk review using the "Walkfree" modern slavery index to identify countries at risk
 - GWF feedback on areas that have been identified as higher risk, for example tomato paste;
 - media and news information.

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Identifying and Managing Risks

Businesses within this statement are responsible for mapping their operations and supply chains to identify where their key risks are present. Some businesses regularly update interactive maps showing where their products are harvested, processed, and manufactured.

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.

By mapping their supply chain and identifying potential human rights risks, businesses can monitor, address, and prevent key issues before they occur, giving priority to the most significant ones.

The ABF Australia business model allows each business to select the best approach for its supply chain and supplier relationships. When suppliers' programmes meet our standards, we rely on them; where they do not, we collaborate or take action to drive improvements. Examples of such actions are discussed elsewhere in this report.

ABF Australia 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. Many are in the process of launching or using SEDEX, using 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.

ABF Australia businesses routinely share insights with each other on major issues, especially where significant risks call for further due diligence. Key topics include human rights concerns in specific regions and the exploitation of agency labour and migrant workers.

Our 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 as they start to begin 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 key risks

Within GWF, each business has either identified key risks based on our processes described above or begun the process.

Tip Top conducts an annual risk assessment to identify its salient risks. The key elements of this are (i) country risk identified using Maplecroft country risk ratings, and (ii) category risk based on Tip Top's understanding of nature of the materials or services supplied. Through this, Tip Top has identified salient risks associated with commodities sourced from Türkiye, Thailand, India, South America, Indonesia and Malaysia. Ingredients listed as salient risks from these countries include raisins, sultanas, modified starch prep, novelose, guar gum, sesame seeds, white chia seeds and margarine. Additional risks include contingent labour in Australia.

To address the risks identified with high-risk ingredients, Tip Top has focused on ensuring high risk suppliers are active in their SEDEX membership and all suppliers have completed a self-assessment questionnaire as a minimum

Mauri has identified internationally sourced grain and ingredients, specifically cocoa and emulsifiers sourced from Malaysia and starch products from Thailand as high-risk focus areas. Mauri is registered with the Rainforest Alliance Cocoa Certification Program 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 commodity risk identified by Yumi's are ingredients from Türkiye, principally Tahini.

GWF's DON Smallgoods business has identified pork product from the USA, Canada, and Denmark as a key risk.

TAG has chosen to identify as a medium risk cocoa from Belgium. While generally rated low risk, the cocoa industry has known global risks related to forced and child labour in upstream supply chains.

To date through the self-assessment process, Tip Top has not identified any non-conformances which require further attention. Should any arise which require further attention, Tip Top will work with the supplier to address these in the first instance. Any incidents which require further attention beyond this point are raised with the Tip Top Executive team and at the necessary ESG forums.

For NWF, the key risks are ingredient products from India (herbs spices and extracts), Thailand (starches predominantly tapioca, both modified and native), and China (food chemicals and additives).

Twinings has a focus across its tea supply chain, including Kenya, India and Sri Lanka. Twinings Ovaltine continues to develop its due diligence approach to assess human and labour rights risks across its global supply chain through audit procedures, monitoring and training to support the implementation of its Code of Conduct and Human Rights Policy. These include its Factory Monitoring and Improvement Programme (FMIP), the Twinings Community Needs Assessment (TCNA) programme and Modern Slavery Awareness training.

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Grievance mechanisms and remedy

ABF Australian businesses promote openness in all interactions with employees and others, including in our Australian businesses.

Honest communication is vital for addressing malpractice and wrongdoing. Our 'Speak Up Policy' sets out guidelines for the employees of ABF businesses who wish to raise issues (including forced labour concerns) in confidence. We offer a confidential external advisory service for all staff, including casual and agency workers.

Our businesses strive to use their influence with suppliers to help them to provide workers with access to remedies for human rights issues in supply chains.

NWF are in the process of reviewing and updating all policies around grievance management as we move from "Whistle-blowers" to "Speak Up". This is also currently covered in our employee and supplier code of conducts and have an inbox where anyone can report any issues.

Consultation and Transparency Stakeholder Consultation

Stakeholders including NGOs, trade unions, governments, other businesses (subject to all relevant competition and anti-trust laws) and industry bodies all inform ABF Australian businesses in their approach to modern slavery. We work with these organisations due to their expert knowledge, and we acknowledge their contribution.

Transparency about who and where our businesses source from is essential to our understanding of human rights risks and, where necessary, encourages collaboration to resolve them both locally and across our industry. Some of our businesses – including Twinings – 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 Australian businesses make decisions based on business needs but also acknowledge the importance of collaborating on 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 now provides advice to GWF on its ethical sourcing policy and procedures as part of the broader GWF Environmental, Social, and Governance (ESG) approach. It is also a forum for sharing updates and collaborating across businesses on progress, information, and developments in relation to ethical sourcing.
- ii. ABF Grocery Group collaboration - ongoing meetings with ABF Grocery Corporate Responsibility Working Group on ethical sourcing progress and discussion.
- iii. ABF/JDR/GWF collaboration on vine fruit in Türkiye - participating with JDR and GWF in Türkiye ethical sourcing in relation to ensuring our raisins and sultanas are being ethically sourced.
- iv. ABF Procurement Leadership pillar workstream on ESG focused on collaboration in relation to ethical sourcing tools, processes, best practice etc.

AB World Foods and JDR

Australian operations of AB World Foods and JDR are 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 GG Sustainability Lead.

NWF

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

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Actions undertaken by ABF Australia Entities in the Reporting Period

ABF Australia businesses are prioritising human and labour rights by focusing on specific value chains with the highest perceived risks for workers. These include raw materials, packaging, finished goods and services (including security, cleaning workwear, temporary labour and logistics providers).

Risks are or will be evaluated using the SEDEX online database for relevant Tier 1 and key Tier 2 suppliers.

Some ABF Australia businesses are now asking Tier 1, and sometimes Tier 2, suppliers of key raw materials to complete a SEDEX self-assessment questionnaire.

Other ABF Australia businesses are considering replicating this work.

GWF

GWF is focusing on its raw material, packaging, finished goods, and service suppliers. It uses SEDEX to assess risks at key tier one and relevant tier two supplier sites.

The GWF business Tip Top continue to lead the development and implementation of Ethical sourcing and modern slavery risk management at GWF.

Through the GWF Ethical Sourcing Working Group, GWF businesses are now learning the process for the development and implementation of a first stage of an Ethical Sourcing program, to adapt to learn in their own businesses. This is expected to develop further for businesses in 2026 and 2027.

Over the past year, GWF has continued to work with our sister companies in UK Grocery to use 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 aim for GWF and its businesses is that 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.

The above process will be designed to be reviewed by the GWF Ethical Sourcing working group and in turn it will report to the GWF Sustainability Taskforce.

Tip Top key undertakings for the year included:

- Completed our second year of supplier risk evaluation using a standard set of criteria across all categories.
- Identified the most salient risks and put mitigation actions in place for each.
- Required 61 suppliers to be registered in SEDEX with 100% SAQ completion.
- Extended SEDEX registration and 100% SAQ completion requirement to all strategic suppliers in our SRM program.
- Linked strategic suppliers to us in SEDEX, giving full visibility of their risk profiles.
- Embedded ethical sourcing as a standing agenda item in all SRM meetings.
- Established open, ongoing conversations with suppliers on ethical sourcing, strengthening transparency and partnership.

Tip Top have been focused on increasing usage of SEDEX to increase understanding of risks in its supply chains. Tip Top have strengthened their procurement processes to ensure ethical sourcing is a key requirement for new suppliers and ethical risks are included in their evaluation processes. Tip Top have introduced a new supplier relationship management programme and ethical sourcing is a key component of this.

Mauri ANZ have launched SEDEX and kicked off 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 Supplier Code of Conduct to ensure consistency and transparency to all suppliers. Mauri Australia are aiming to have 80% based on spend of Business Partners connected on the SEDEX Platform with further KPI's for SAQ's and SMETA audits in 2026.

Twinings, ABWF and JDR

Twinings

Twinings'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.

Twinings has controls and processes in place to assess human and labour rights risks across its global supply chain. It recognises that respecting human rights practices are a critical foundation for a more sustainable and resilient business.

The company is committed to embedding the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises into its sourcing, conducting business with integrity, and respecting human and labour rights through its Code of Conduct and Human Rights Policy.

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Its due diligence approach, including audit procedures and training, continues to support the implementation of its Code of Conduct and Human Rights Policy. These include its Factory Monitoring and Improvement Programme (FMIP), the Twinings Community Needs Assessment (TCNA) programme and Modern Slavery Awareness training programme.

FMIP covers Twinings's operations and Tier 1 suppliers, including third-party manufacturers (e.g. co-manufacturers, licensing) and warehouses, packaging, raw materials processors, branded items for promotion, as well as internal and construction services at their own sites. Each site is risk assessed, considering country, products, labour rights risk and the importance of the supplier to the business. All high-risk suppliers, defined as those with significant potential for human rights and labour issues, are audited by an independent third party.

Modern slavery training continues to be required for Tier 1 supplier factories operating in high-risk countries, with a focus on suppliers employing migrant workers. The e-learning course is developed by Twinings, and suppliers can complete the course once they have registered.

A TCNA covers issues related to human rights and the welfare of workers in its supply chain such as gender, health and nutrition, children's rights, livelihoods, water and sanitation, natural resources, farming practices, housing and working conditions. This approach allows Twinings to develop targeted programmes that help to address the needs of each community.

Following issues identified in its Kenyan tea supply chain in 2023, Twinings developed a Gender Based Violence and Harassment (GBVH) Policy to help tea gardens effectively prevent and address GBVH, reduce its risks, and protect women workers. Tea gardens supplying Twinings are required to sign up to this policy, in addition to the Code of Conduct.

After signing, the supplier must submit a self-assessment report on policy compliance, which is verified by a third party or Twinings' Social Impact & Sustainability team. If non-compliance is found, producers receive guidance, best practice toolkits, and tailored training. Tea gardens must also formalise GBVH prevention measures and show ongoing improvement.

Most tea gardens in Kenya have now signed the policy, which is also being rolled out in other key sourcing countries, including Sri Lanka and India.

Twinings is committed to playing a leading role in developing a progressive and thriving tea and herbs industry. It recognises that this requires collaboration with a range of stakeholders across the sector to help bring about industry-wide change. To meet its goals, it collaborates with producers, NGOs, government agencies, industry groups, and tea and herb communities in key sourcing regions to tackle broad social and environmental challenges.

JDR

Over the past year, JDR, as part of the UK Grocery division of ABF, continues to contract with an independent third-party ethical consultant to provide advice on relevant ethical policies and procedures. 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 have amended their policies to cover responsible sourcing, environmental impacts, and remediation and are working on procedures to underpin these policies.

JDR, as part of ABF's UK Grocery Group, require Tier 1 and Tier 2 suppliers of raw materials and other key commodities to complete a SEDEX self-assessment questionnaire with a completion rate of 90% in 2024/25, following an increase from 60% in 2023/24, despite changes to the questionnaire, reflecting strong ongoing engagement from suppliers.

Subsequently, in-scope suppliers are required to upload the results of all respective ethical audits conducted onto the SEDEX platform. Any non-conformances identified are escalated to the JDR Sustainability Manager as well as technical and procurement contacts within the relevant businesses. They then follow internal escalation and corrective action processes, with suppliers engaged to cease, prevent or mitigate the issues raised. All identified issues are continuously monitored and reviewed to support ongoing improvement.

JDR conducts due diligence for new and existing suppliers, requiring them to follow our 'Terms and Conditions of Purchase' which specifically contain the ABF Code of Conduct and adhere to ethical business standards. As part of its supplier approval process, JDR takes steps to ensure any new supplier meets its Responsible Sourcing Policy requirements and is provided with a copy of the ABF Code of Conduct.

NWF

In the case of NWF, there has been focus in continuing in 2025 to ensure Tier 1 suppliers are registering with SEDEX. In the interim all suppliers are required to complete a self-assessment questionnaire and agree to the NWF Code of Conduct. In 2025, NWF commenced linking on SEDEX with Tier 2 suppliers which is something that NWF will continue to work on into 2026.

NWF also put in a new resource to support in this area and that resource is currently working through a training program that includes SEDEX and other online material. As part of NWF's transition to a new Human Resources platform, NWF is conducting a full review of existing modern slavery compliance process and policies to ensure it is relevant and compliant.

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Examples of Effectiveness in ABF actions on Ethical Sourcing

Helping migrant workers and their families in Türkiye

ABF businesses Jordans Dorset Ryvita, AB World Foods, of which ABF Australia businesses JDR and AB World Foods are a part, together with other ABF businesses Allied Bakeries and Speedibake, are actively engaged in trying to improve the working conditions of migrant workers in Turkey's agricultural sector. In partnership with the Fair Labor Association (FLA), they are assessing the needs of workers, farmers, and labour intermediaries in the vine fruit and hazelnut sectors.

To drive change, these businesses have implemented a framework to evaluate supplier performance against key indicators such as child labour and wages. This approach, combined with increased on-site engagement, has led to tangible improvements.

In July 2024, a delegation from ABF businesses visited Türkiye to gain a better understanding of vine fruit production and strengthen industry collaboration. During this visit, they met with key stakeholders, including government officials and industry representatives. As a result of the visit there are ongoing discussions on standardising farmer documentation, developing a roadmap for improvement, sharing best practices and engaging with labour contractors and government entities.

This approach, combined with increased on-site engagement, has led to the development and implementation of child labour remediation procedures by some suppliers and improvements in worker-related record keeping by some farmers.

GWF – Tip Top and overseas Supply Chains

All Tip Top suppliers are required to comply with both the ABF and GWF supplier codes of conduct as part of contracts and terms and conditions.

To do this, Tip Top has undertaken the following actions – often in partnership with other ABF entities:

- i. Raisins and sultanas are sourced from Türkiye – Tip Top has collaborated with JDR to assess human rights risk.
- 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. Various materials are currently purchased from China; however, Tip Top is ensuring that it does not purchase any products manufactured or grown in Xinjiang, China.
- vi. Where Tip Top requires ingredients containing palm oil, Tip Top requires its suppliers to have RSPO membership.

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

- AB Food & Beverages Australia Pty Ltd on 25th November 2025;
- AB Mauri ROW Holdings Pty Ltd on 11th December 2025; and
- Food Investments Pty Ltd on 7th December 2025.



Craig Scott

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



Anthony Brooks

Director, AB Mauri ROW Holdings Pty Ltd



Paul Foster

Director, Food Investments Limited