



New Food Coatings Pty Limited (ACN 002 604 042) trading as:

## **Newly Weds Foods (Australia)**

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## MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

### Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At New Food Coatings Pty Ltd, trading as Newly Weds Foods (Australia), Newly Weds Foods (New Zealand), Newly Weds Foods (Thailand) and Newly Weds Foods (Philippines) we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2020.

### Our business and supply chains

New Food Coatings Pty Ltd is a manufacturer of food ingredients, employing over 635 people, 218 in Australia, 23 in New Zealand, 297 in Thailand and 97 in the Philippines, supplying Breadcrumb Coatings, Batters, Seasonings, Sauces, Marinades and functional ingredients to Poultry, Seafood, Meat, Smallgoods and Pasta processors.

Our head office and main manufacturing plant is in Sydney, with a second Australian plant in Perth and plants in New Zealand, Thailand and Philippines supplying local and export markets.

Wherever possible we source our raw materials and packaging items from locally grown or locally manufactured sources, however we do also source ingredients from China, India, Thailand, Vietnam, USA, Canada and Europe, both directly and through local distributors

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report the allegation to the authorities for investigation.

#### Risk assessment

In the past year, we conducted a risk assessment of our supply chain taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

## Policies

New Food Coatings Pty Ltd operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Whistleblowing Policy** - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- **Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Workplace Accountability Policy**
- **Purchasing Code** - we have updated our Purchasing Code and Supplier Questionnaire to make explicit reference to slavery and human trafficking.

Similar Policies exist in New Zealand, Thailand and Philippines

## Supplier due diligence

New Food Coatings Pty Ltd, conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals.

This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We are requesting all suppliers attest that:

They provide a safe and healthy work environment and are not engaging in forced or bonded labour, human trafficking, slavery or child labour in contravention to International Labour laws

They are conducting business ethically, lawfully and with integrity, offering reasonable hours, wages and conditions to all employees

They are aware of and uphold all relevant laws and regulations in the countries in which they operate

## Awareness

New Food Coatings Pty Ltd, has raised awareness of modern slavery issues by putting up posters across our facilities, on our internal Notification Screens and sending an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

## Training

In addition to the awareness programme, New Food Coatings Pty Ltd, is rolling out a training session to all employees which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- An attestation from employees that they will abide by New Food Coatings Pty Ltd, anti-slavery policy –


## Measuring how we're performing

New Food Coatings Pty Ltd, has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain.

These include:

- Number of employees that have completed mandatory training?
- Number of suppliers that have filled out our ethics questionnaire?
- Number of suppliers that have rolled out an awareness and training programme that is equivalent to ours?
- Number of reports that have been made by our employees that indicate their awareness of and sensitivity to ethical issues?
- Third Party Social Accountability Audit
- Internal Social Accountability Audit

This statement covers 1 August 2019 to 31 July 2020 and has been approved by the board of New Food Coatings Pty Ltd.

Signature:  .....

Director

Name: Stuart Grainger .....

Date: 4.12.2020 .....

Signature:  .....

Director

Name: John J. Seely .....

Date: 10/4/2020 .....